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Comments: I am writing as an American citizen and a resident of the Pacific Coast, having visited Alaska recently for a dear friend's wedding. I take issue with several assessments made in the proposed rule.

1) While the report concludes that "the circumstances of the Tongass National Forest appear to be best managed through the local planning processes," there are constituencies larger than those bodies with influence at a local level. To wit:

1A) Tongass rivers, lakes, and streams produce 80% of the commercial salmon annually harvested from Southeast Alaska, and a full quarter of the entire west coast catch. This is about 50 million salmon valued at \$60 million annually, and 1 in 10 jobs for Southeast Alaskans. Vast majorities of Alaskans affirm the traditional role of salmon, and the need to preserve habitat, even in challenging economic circumstances. (Source: Tongass Salmon Factsheet R10-PR-40, US Department of Agriculture.

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd554592.pdf)

1B) Tourism in Southeast Alaska is a far greater source of jobs than logging, which is one-seventeenth the employment engine of the former. (Source: Alaska Southeast Conference.) Logging and habitat removal threatens far more livelihoods than would be created.

1C) The Tongass stores more carbon removed from the atmosphere than any other national forest in the country in its old-growth Sitka spruce, hemlock and cedar trees. It helps protect Alaska, which is warming more than twice as fast from climate change as our planet overall. While the draft EIS claims to be in acting accordance with the latest IPCC recommendations for habitat management, authors of recent IPCC guidelines have explicitly disagreed (Source: Scientific American, <https://www.scientificamerican.com/article/experts-dispute-trump-administrations-rationale-for-alaska-logging/>) In effect, the constituencies to be consulted at this point include all Americans, and the world in general. Damaging pristine, high-sequestration habitat at this critical juncture constitutes an act of global mismanagement.

2) Current assumptions for the sustainable harvesting of wood from the Tongass are based on linear projections of current conditions holding fundamentally the same. In addition to its direct effects of warming temperatures, rising weather volatility, and ocean acidification, the ongoing climate emergency has a second-order effect of *dramatically* increasing the levels of volatility, uncertainty, complexity, and ambiguity in the planning process. Significant unknowns exist, and the evidence of potentially unforeseen ecosystem collapse grows with every IPCC report. The fundamental planning assumptions in the proposed rule do not take these realities into account.

3) The current state of outreach and consultation with local bodies has not acknowledged the input of local native communities, all of whom oppose Alternative 6, and expressed that opposition in a letter to Secretary Perdue in October. (Press Release: <https://www.hia-env.org/wp-content/uploads/2019/10/Tribal-CA-Press-Release-2019.pdf>) Any elected official in Alaska who supports a full exemption, is disregarding their constituents, undermining the public process, and ignoring the sovereign Tribal governments whose people have lived and depended on these lands and waters since time immemorial, said CCHITA President Richard Peterson.

While Alternative 2 is by far the preferable one, as it deals with the core problem of "roadless" area without significantly disrupting ecosystems, the choice of a full exemption is rushed, undemocratic, and criminal in nature. It does not appropriately reflect the desires and priorities of the Alaskan people, who would be altogether justified in waging massive opposition to a federal agency using a sham process to sell out their natural patrimony to timber barons.

Government rests on the consent of the governed. When it begins acting as the vehicle for corrupt interests, it is only right for the people to withdraw their consent.

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