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Comments: The Tongass National Forest should not be exempted from the 2001 Roadless Rule. The Tongass provides habitat for salmon and other wildlife, provides livelihoods, tourism and recreation opportunities, opportunities for subsistence harvest, cultural values, and carbon sequestration. The Roadless Rule provides protections to the Tongass that ensure the forest can continue to provide these ecosystem and socioeconomic services.

The Tongass should not be exempted from the Roadless Rule unless the Forest Service has done a thorough socioeconomic impact analysis, that includes subsistence uses, of the impacts of a Roadless Rule exemption on the local community. The analysis should be conducted in consultation with tribes and local communities in Southeast Alaska who know best what socioeconomic and subsistence impacts the exemption might have.

The Forest Service should also conduct an analysis of the loss of carbon sequestration potential that would result from a Roadless Rule exemption. As one of the largest remaining old-growth temperate rainforests in the world, the Tongass represents a significant global carbon sink. As the impacts of climate change continue to be felt globally, identifying high potential areas for carbon sequestration is going to become increasingly important and central to stabilizing our climate. Creating roads will release carbon stored in the soil and logging that will be permitted following an exemption would also release carbon stored in woody materials. The Forest Service should not move forward with the exemption if the analysis shows the exemption would reduce the amount of carbon sequestered in the US.

Lastly, the Tongass provides habitat for salmon, which is culturally and economically critical to Southeast Alaska. Logging and roadbuilding in the Tongass could increase sediment loads in streams and could reduce habitat for spawning. The Forest Service should work with NMFS to conduct an analysis of the potential impacts to salmon populations. If the exemption is found to threaten salmon populations or the commercial or subsistence harvest of salmon in Southeast, the exemption should not go forward.

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