

Data Submitted (UTC 11): 12/17/2019 9:00:00 AM

First name: Anon

Last name: jagrant

Organization:

Title:

Comments: RE: Discontinuation of the Roadless rule -- Tongass National Forest

To the USDA/US Forest Service:

I am writing you to voice my opposition to the proposed consideration of discontinuation of the existing regulations prohibition of the roadless rule.

I have lived in Southeast Alaska for forty years, having lived in Wrangell (78-81), Ketchikan (81-83), Petersburg (83-86), and Juneau (86-presently).

I have a B.S. degree in natural resources studies, with a minor in Forestry. As a consequence I have worked in Forestry for approximately 20 years, seasonally for the US Forest Service on Afognak Island for the Chugach NF, and the Bridger-Teton NF, and full time on the USFS Wrangell ranger district, much of this work with the USFS has been in timber sale administration.

For nearly ten years I worked for the Alaska Department of Natural Resources (ADNR) in forest practices, overseeing timber practices on private Native corporation lands, primarily in southern and central Southeast Alaska. I was a primary staff member assisting in the revision to the state's Forest Practices Act (FPA) and as part of that effort I was primary as part of a very small team to draft revision to the current Alaska's Forest Practices regulations.

Since 1990 I had worked (retired June 30, 2019) with the Alaska Department of Environmental Conservation (ADEC) Division of Water. For 24 years with the ADEC I was lead on development of the Alaska's responsibility under the federal Clean Water Act (Sections 305(b) and 303(d)) in reporting the overall health of Alaska's water health in relation to federal and Alaskan water quality standards. In this capacity I have seen many waters (fresh water streams, and marine impairment (such as log transfer facilities) Section 303(d) listed impaired as a result of forest practices activities.

In this regard, I have seen many acres of Southeast timberlands harvested, both on private lands and many Tongass NF lands, particularly under the long-terms sales (i.e., Ketchikan Pulp Company (KPC) and Alaska Lumber and Pulp (ALP)). This has resulted in loss of valuable habitat and recreational activities. I have witnessed and been part of violations of federal and state rules, for instance in terms of protection of resident and anadromous fish streams. As part of this effort I was disappointed to see KPC and ALP to gain "credits" for building mainly ("spec") roads and as a consequence they were essentially getting the timber for (nearly) free.

Lastly in my long career and experience in the timber industry, particularly in Alaska, Alaska's timber market has always Asian markets and it was always known that, in terms of the timber market, Alaska was always "last in, first out." The market just isn't there. It is evident that Southeast Alaska's timber industry is a skeleton of what we have seen the past but discontinuation of the roadless rule won't change that.

Again, I write to object to the proposed consideration of discontinuation of the existing regulations prohibition of the roadless rule.

Sincerely and respectfully,

/s/

J. Andrew Grant

Juneau, Alaska

[Position]