Data Submitted (UTC 11): 12/9/2019 9:00:00 AM
First name: Rocky
Last name: Smith
Organization:
Title:
Comments: Attached are my comments on the proposed exemption of the Tongass NF from the Roadless Rule.

Rocky Smith

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

Alaska Roadless Rule

USDA Forest Service

P.O. Box 21628

Juneau, Alaska 99802-1628

Vi e-mail : www.fs.usda.gov/project/?project=54511

December 9, 2019

Dear Forest Service,

The following are my comments on the proposed rulemaking that would exempt the Tongass National Forest from the Roadless Area Conservation Rule (RACR).

Currently, most of the Tongass NF is ecologically intact. The DEIS well describes the values of the roadless lands on this national forest:

the Tongass is currently more than 90 percent undeveloped and unavailable for timber harvest and road building.

Developed areas cover about 1.3 million acres, or about 8 percent, of the Tongass.

Several portions of the Tongass constitute contiguous IRAs exceeding 1 million acres, and thus represent large, unfragmented wildlife habitats and opportunities for solitude. Many of the Tongass IRAs represent wildlife habitats, ecosystems, and visual characteristics, such as coastal islands facing the open Pacific, extensive beaches on inland saltwater, old-growth temperate rain forests, ice fields, and glaciers that exist nowhere else in the National Forest System (NFS). Many of these areas are remote and difficult to access for primitive recreation and contain other important resources, such as timber, minerals, renewable energy opportunities, and salmon-producing streams. [hellip]

This large scale of roadless area, including wildernesses and national monuments, does not exist anywhere else in the NFS outside of Alaska. The Tongass is the largest national forest in the United States, and the majority of the Tongass is in a natural condition, unlike most other national forests. It represents one of the largest, relatively intact temperate rainforests in the world.

DEIS at ES-1, 2; emphasis added. The DEIS thereby makes a very strong case for conserving the roadless lands of the Tongass.

I believe the Tongass should be maintained in this condition. As one of the last semi-intact rainforests in North America, the Tongass provides inestimably high value for biodiversity, opportunities for scientific research, human-powered recreation, and scenery. These values cannot be created except over a very long period of time, but they can quickly and easily be damaged or destroyed by road construction and subsequent logging and/or other extractive activities.

The current roadless rule, RACR provides a moderate level of protection for the roadless lands of the Tongass. RACR prohibits logging and road construction with some narrowly-tailored, common sense, and emergency-type exceptions.

However, the proposed rule could lead to degradation and elimination of roadless area characteristics in some currently roadless areas. Though the proposed rule would not authorize any specific projects, it would pave the way for future timber sales inside of current roadless areas by making current roadless areas suitable for timber production. Any projects in roadless areas approved under the proposed rule would likely involve road construction and commercial logging, activities that are largely prohibited by RACR. Thus roadless area characteristics would be degraded.

Though not a part of the official purpose and need, the following is, ironically, cited as a reason for promulgating he proposed rule:

Forest Service and the State of Alaska believe that the proposed action represents a unique opportunity to collaboratively resolve and provide certainty to the roadless issue in the State of Alaska."[hellip]

In response to the State of Alaska's petition for rulemaking, the Forest Service and State of Alaska agree the controversy surrounding the management of Tongass roadless areas may be resolved through state-specific rulemaking.

ES-2.

In truth, the issue was resolved in 2001 with publication of the final RACR. Removing roadless protections completely, as is proposed, will not resolve controversy; rather, it will (in fact, it already has) generate a great deal more controversy. RACR has wide public support. Rescinding it for the Tongass will be extremely controversial. This is yet another reason not to exempt the Tongass from RACR. RACR has very strong public support, in Alaska as well as elsewhere. Areas already roaded can be managed to produce timber, if that is desirable, while the remainder of the Tongass needs to be managed for its inestimably valuable ecological attributes..

CONCLUSION

Roadless protection for all roadless lands in the Tongass NF must be maintained. Alternatives 1 and 2 from the DEIS are the only ones that are acceptable.

At a bare minimum, no cutting of old growth timber in roadless areas can be allowed. Old growth is a very ecologically valuable stage that cannot be created by humans. Even alternative 2 would convert 18,000 acres of old growth into suitable timber lands. ES-7.

Sincerely,

Rocky Smith, Forest Management Analyst

Denver, CO 80203

[Position]