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Organization:
Title:
Comments: Comments/DEIS Tongass Roadless Rule

Please confirm receipt of my comments. Thanks.

Becky Long

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11/04/2019

Long

, Talkeetna AK 99676

US Secretary of Agriculture Sonny Perdue

1400 Independence Ave SW, Washington DC 20250

Christensen, Chief of the US Forest Service

PO Box 21628, Juneau AK 99802

COMMENTS ON THE DEIS TONGASS EXEMPTION FROM NATIONAL ROADLESS RULE

PROJECT 54511 ALASKA ROADLESS RULEMAKING

I support the NO ACTION ALTERNATIVE.

I have commented on Tongass National Forest management for years. This rulemaking effort is in response to a

petition from the state of Alaska administration. This petition does not represent me as an Alaskan resident. The state petition process was not democratic.

This proposed land classification change has sparked wide national interest which is shown by the 143,900 scoping comments last year.

The Process

1. Why did the US Forest Service, a federal agency, subsidize the state of Alaska with \$2million and the Alaska Forest Association with \$200,000 to participate in the process? That is a management conflict of interest and a waste of taxpayer monies. Why did you NOT subsidize the 6 federally recognized tribes and Southeast communities to participate in the process? Commercial logging of old growth forest interests are being favored in a prejudicial way especially with this subsidization.
2. Why were the 6 federally recognized tribal governments not treated as sovereign tribal governments? Why are they treated as cooperating agencies only? This administration has ignored the government to government relationships necessary in the NEPA processes in Alaska for every major development project on federal public lands. It is a disenfranchisement. These are tribal homelands. Tribal concerns should not be dismissed by the arbitrary and capricious deadlines set that does not allow for meaningful engagement.
3. Blatant misinformation has been spun in the media. The Tongass Roadless Rule did NOT stop all road building since 2001 in the 9.2 million acres of roadless protected land, as has been reported. In fact, since 2009, the USFS has approved 57 projects in the roadless area for mining exploration, hydroelectric development, electric intertie access and community purposes. So that argument that development has been stopped by roadless protection is bogus.

Current Southeast Economy Threatened by Tongass Roadless Exemption

The current economy of Southeast is based on the sustainable resources of the Tongass National Forest (TNF). Lifting the roadless rules threatens the sustainability of these resources specifically as to the visitor and seafood economic sectors.

- * The TNF produces 79% of the Southeast commercial salmon specifically 49 million salmon per year. The industry is 20% of the SE economy employing 4,000 people with shared fish taxes of \$3.8 million to the community. This industry cannot be risked by lifting the roadless rule (RR).
- * The visitor industry employs annually 11,925 annual jobs (017 numbers) for \$445 million in labor income. The sales tax revenue is \$24.3 million. This is $\frac{1}{14}$ of the total SE jobs.
- * The SE timber industry is less than 1% of SE earnings with approximately 354 jobs. Even Congressman Don Young of Alaska admits publicly that exempting TNF from the RR will not bring back a long term timber industry. This is due to the global timber market. And he is for exemption. So what is the point?

The National Taxpayers are Subsidizing the TNF Timber Industry

In the past 20 years, the US Forest Service has lost nearly \$600 million through road building and timber sales. This is an average net loss of \$30 million yearly. The rollback of the RR will accelerate this subsidization. The system is broken. It is not appropriate for the taxpayer to pay for timber infrastructure. Why doesn't the timber industry pay for putting in the roads? After all, this is supposed to be a capitalist system not a socialist system for industry.

The Government Accounting Office of Washington DC has projected a loss of \$100 million in the timber program even if there is an additional 300 million board feet harvested in the next 4 years.

Subsidized timber sales that cut down old growth forests and degrade habitat are a threat to the SE way of life and bad public policy.

The Importance of TNF's Carbon Storage

The TNF stores more carbon than any other national forest. It plays an important role in moderating the climate change impacts. Large old growth stands are rare after 70 years of high grading the old big stands. Old growth stands are some of the most valuable fish and wildlife habitat. There is strong scientific consensus on the ecological importance of old growth stands.

About half the mass of a tree is carbon. Older trees because of their size store more carbon.

Exempting TNF from the RR means there will be timber sales in the remaining old growth. Those trees are more valuable NOT BEING CUT DOWN. IT IS FOR THE GOOD OF THE PLANET TO KEEP THEM WHOLE AND IN PLACE.

Please consider these comments and accept the No Action Alternative which retains the status quo roadless rule for the Tongass.

Sincerely,

Becky Long

[Position]