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Comments: 12-12-2019 Tongass Roadless Comments: of MarkRobinson Professional Geologist,

My attached are comments of Mark Robinson Professional Geologist

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12-12-2019 Tongass Roadless Comments: of Mark S. Robinson Professional Geologist, CPG

My comments below, are extracted from a variety of sources, including the Alaska Miners Association, The Council of Alaska Producers, and The U.S. Forest Service.

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The U.S. Department of Agriculture (USDA) is proposing to exempt the Tongass National Forest in Alaska from the 2001 Roadless Area Conservation Rule, which prohibits tree harvest and road construction within inventoried roadless areas.

In 2018, the State of Alaska petitioned the USDA to exempt the Tongass from the national roadless rule. The USDA responded, directing the Forest Service to initiate steps to examine a state-specific roadless area management direction for the Tongass. The agency developed a draft environmental impact statement (DEIS) and proposed rule after extensive work that included recommendations and comments from State officials, Alaska Native groups and corporations, organizations, and individuals. The DEIS prepared under the National Environmental Policy Act, provides an analysis of six alternatives to roadless management in Alaska. The alternatives range from no action to the removal of the Tongass from the 2001 Roadless Rule. The USDA has identified Alternative 6, which is a full exemption, as the Preferred Alternative at this time. A final decision, after further public involvement, is expected in 2020.

Historical Perspective:

Congress enacted the National Forest Management Act in 1976. That act directs the Forest Service to prepare land management plans to guide all activities on each forest. The plans are designed to be updated every 10 to 15 years. In 2001, the agency adopted the Roadless Rule, an administrative rule that effectively exempted about one-third of all national forest lands out of the normal planning process and banned most development activities in the roadless areas.

On the Tongass National Forest, the Roadless Rule and Congressional set-asides exempt 93 percent of the forest from the normal planning process and timber harvesting. This is particularly harmful in Southeast Alaska because the combined State and private lands comprise only about five percent of the region.

Unlike all other national Forests subject to the roadless rule, the Tongass has undergone two Congressional reviews and a Secretarial review in 1999 that collectively set aside over 6.6 million acres of roadless, rule areas

as Wilderness and other restrictive land use categories prior to promulgation of the roadless Rule. While the Roadless Rule recognized that the Tongass was different from other national forests, it did not explain why a fourth review with its additional withdrawals were needed to achieve the objectives of the Roadless Rule.

The combined effect of the Alaska National Interest Lands Conservation Act, other reforms, and roadless area designations has been to deny access to roadless areas for timber harvest, make access for renewable energy projects and mining exploration and development difficult, and to inhibit transportation in Southeast Alaska.

Today the manufacturing capacity in the forest has fallen 80 percent from what it was in 2001 and most of the remaining capacity is severely starved for timber on which to operate. As a result, the region has lost nearly 3,000 year-round, family wage jobs.

Please support Preferred Alternative - Alternative 6, which is the full exemption.

ENGOS are generating a large volume of comments nationwide demanding that the 2001 rule remain in place. 2019.

The Tongass National Forest should be fully exempt from the Roadless Rule. The majority of the forest is already permanently set aside from timber harvesting and other development activities are difficult to achieve at best. Mining, energy development, and community access are severely inhibited by the Roadless Rule.

The National Forest Management Act planning regulations are the proper way to manage the remaining areas on the Tongass as a multiple-use forest.

Exempting the Tongass from the Roadless Rule will not harm the region's fisheries. Fish habitat is fully protected in the national forest.

The Alaska Department of Fish and Game (ADF&G) records show that salmon populations have doubled in the region since timber harvesting began in the mid-1950s. This could not have happened if logging had harmed the fish habitat.

Wildlife habitat is also fully protected on the national forest and wildlife is thriving in the young growth stands where timber harvesting has taken place over the last 65 years.

Most outdoor recreation on the forest takes place in or near the previously harvested areas because of the access provided by logging roads.

Timber harvesting has not impacted the tourism industry. Visitation to the region has sharply increased over the past 20 years.

The forest products industry needs a larger timber supply in order to restore more year-around jobs and to help build stronger local communities and diversify the Southeast Alaska economy.

Even though 9.2 million acres of inventoried roadless areas in the Tongass would be freed from the roadless rule under a full exemption, only 168,000 acres would be added to the areas that may be considered for timber harvest. A much smaller portion of this acreage would actually be harvested due to ongoing restrictions, including buffer zones, wildlife preservation corridors, and other set-asides.

The full exemption does not change the projected timber sale quantity or timber demand projections set out in the

2016 Tongass Forest Plan. The Preferred Alternative increases management flexibility for how the forest plan's timber harvest goals can be achieved, but does not fundamentally alter the plan's underlying goals or projected outcomes, including an annual harvest level of 45 million board feet, which is considered very conservative.

The Preferred Alternative would allow forest managers to tap parts of the forest where logging could be more cost-effective. That, in turn, would help local sawmills and boost the economy in Southeast Alaska.

Some proponents of the Roadless Rule claim that the timber program on the Tongass costs taxpayers too much. In truth, the agency gets more in revenue than it spends in the areas that are harvested.

Environmental appeals and litigation have resulted in the loss of more than a third of all timber sales that were prepared since the Roadless Rule was administratively imposed. Roughly two-thirds of all remaining timber sale projects are never sold. These abandoned sales represent a loss to the taxpayers, but the timber sales that are allowed to go forward provide a significant positive revenue for the federal government and provide a lot of local economic activity.

Road building and access to lands in the Tongass Forest are essential elements to a healthy mineral exploration and mining industry in the Tongass. These industries can provide and are currently providing many jobs and tax revenues to local communities in the Tongass. Please choose Option -- 6 total exemption for the Tongass final option --- Option 6

Thanks very much,

Mark S. Robinson, Professional Geologist

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