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Organization:

Title:

Comments: Full Exemption from the Roadless Rule for the Tongass

Attached

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December 17, 2019

USDA Forest Service, Attn: Alaska Roadless Rule, P.O. Box 21628,
Juneau, Alaska, 99802

The Roadless Rule is focused on severely restricting future timber harvest from the Nation's national forests and limits construction of new roads within the national forests. Using a national rule to prohibit cutting trees and construction of new roads to access all resources within our national forests impacts development of future access and utilization of all other uses of the national forest and its diverse natural resources. The Roadless Rule impacts responsible multi-use forest land use planning. The Roadless Rule does not allow consideration of local and regional socio-economic land use needs. It does not allow management flexibility to respond to changing conditions and new information. It arbitrarily limits future access development, resource assessment, and land use management.

The roadless rule does not impact the Nation's forests and states uniformly. The US Forest Service has acknowledged in the past that applying the roadless rule to the Tongass National Forest would adversely impact the economy of Southeast Alaska (an area the size of Florida) and has exempted the Tongass NF from the rule in the past. Granting the Tongass a full exemption from the roadless rule would reinstate consideration of local conditions; the ability to respond to the needs of area residents and new information in management of the small remaining area not already locked up in wilderness and conservation reservations. Tongass land management under a full exemption would still be subject to NEPA and the myriad of environmental laws and regulations but provide some flexibility to clear timber and construct road access in support of various local uses when adequately justified and impacts mitigated in a planning process that is enabled to consult and respond to local needs. National rules trump good area land use planning.

The Tongass Land Management must be revised to recognize Alaska's Section 4407 transportation-utility corridors granted by Congress through the Tongass. This law takes precedent over the Roadless Rule. Tongass land management prescriptions and guidelines in areas impacted by potential future highway and utility development in these broad corridors granted and set aside by Congress to connect communities to each other, to the forest, and to improve regional transportation need to be incorporated into the Tongass Land Management Plan (TLMP). The Transportation and Utility System (TUS) overlay corridors should be reinstated in the TLMP as a potential land use on par with wilderness areas as established in law.

Global Warming issues are a growing concern and the management of our national forests has been raised as a tool to mitigate the carbon footprint of man. Roadless will limit our ability to utilize timber harvest and road construction in the Tongass as tools to maximize the sequestration of carbon in the future. If our goal is to lock up carbon, science should support harvesting old growth trees to lockup carbon in construction of housing and wood products to allow new growth to sequester Carbon at a faster rate while reducing the amount of wood ultimately ending up in the forest compost. Harvesting old trees before they fall into the forest floor compost should become a priority. At maturity the decay of organic debris in the organic ground matt (forest compost) releases as much carbon (in the form of methane and carbon dioxide) as the upper story of the forest takes in. Every mature forest and grass land are believed to reach carbon sequester equilibrium at maturity. Too much attention has been focused on the upper story of the forest and none on the forest compost. If old growth forest carbon sequestration rate is neutral; responsible harvest of old growth timber with due consideration to mitigate disruption of habit may ultimately be an economic win for both forest products and global warming mitigation. A rule prohibiting roads and timber harvest across all National Forests subverts good land use planning, specifically when applied to Alaska and the Tongass. Alaska apart from a few urban areas is a Roadless State with only the remnants of a small wood products industry. Alaska is a young developing state rich in natural resources, but economic development of our resources requires roads.

Alaska needs a Tongass Land Management Plan tailored to the needs of not only the nation but the needs of Southeast Alaska. The needs of the region should not be trumped by a Roadless & Timber Harvest Prohibition Rule limiting good management and planning. Alaska needs roads to support resource development.

I support a full exemption from the Roadless Rule exemption for the Tongass National Forest.

Andy Hughes

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