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Comments: See attached file(s)

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My name is Angela Hessenius. I am a graduate student currently studying environmental management in Durham, North Carolina. Last year, I lived in Sitka, Alaska serving as an AmeriCorps VISTA volunteer and had the opportunity to experience the wonder of the temperate coastal rainforest of the Tongass National Forest. Even though I now live thousands of miles away, I still feel deeply connected to the communities and the landscapes of Southeast Alaska, and I am extremely concerned about the proposed exemption to the Roadless Rule for the Tongass. I feel that it makes little environmental or economic sense, that the benefits that such an exemption would bring have been overstated and the costs understated, and that the entire process has largely been driven by politics and not by the will of the people who live in Southeast Alaska and will be most acutely affected by this change.

It has been argued that this exemption is necessary because it will give greater local control to make decisions and that this exemption is necessary because it will provide the needed flexibility to improve rural economic development. However, most people living in these rural communities are opposed to changing the roadless rule. How does it make sense to try to give local people more control by changing an existing rule against their will? Exceptions already exist within the Roadless Rule for projects such as renewable energy development that can be beneficial to rural residents;[1] if increasing the cost-effectiveness of such proposals is truly the main issue, then the Forest Service should focus on streamlining the process for such exceptions, not upending the entire Roadless Rule to accomplish these goals.

In particular, the voices of the indigenous residents of Southeast Alaska, who have been stewards of this land for over 10,000 years, should be given greater weight. Six Tribal governments that had participated as cooperating agencies during the rulemaking process issued a joint letter to Secretary Perdue expressing their unity in opposing the full exemption to the Roadless Rule.[2] I feel that the lack of government-to-government consultations with Tribal agencies makes the DEIS inadequate, and that the Tribes who participated in the rulemaking process as cooperating agencies should be compensated for their contribution to this process, and the valuable traditional and local knowledge they hold should be honored and respected.[3]

Timber harvesting on the Tongass has never been a good economic investment. Over the past 20 years, U.S. taxpayers have lost \$600 million, because the costs of conducting these timber sales are higher than the revenues they bring in.[4] Meanwhile, in the process, such clear-cutting is destroying an extremely valuable ecosystem that will take lifetimes to recover and has the danger of adversely impact intact watersheds and fish and wildlife habitat, threatening the subsistence resources that local people rely and the industries that actually support much more of the regional economy, such as fishing and tourism (the timber industry makes up less than

1% of the regional economy, while the seafood and visitor industries combined make up about 25%).^[5] Places such as Prince of Wales Island have already been so intensely logged that these ecosystems are under significant threat, and it is unacceptable to push these ecosystems to the point of collapse for the sake of continued resource extraction that does not help to create a sustainable economic future for Southeast Alaska.

I believe that the politicians who are pushing for this exemption are not actually representing the interests of the majority of their constituency; instead, they are making promises to revive a past that cannot be retrieved. The timber industry cannot ever be as it was; wise and responsible policymaking would look forward and develop clearer plans for a transition to second-growth timber harvesting on the Tongass.

The Forest Service itself writes in the DEIS that “[t]he 2003 Tongass Exemption rulemaking reflected not so much a change of underlying facts or circumstance but instead reflected a different policy perspective on the roadless policy question.” However, in *Organized Village of Kake v. U.S. Department of Agriculture* (2015), the Ninth Circuit found that the USDA’s promulgation of the Tongass National Forest Exemption in 2003 violated the Administrative Procedures Act (APA) because the USDA failed to provide a reasoned explanation for why the 2003 ROD, which promulgated the Roadless Rule Exemption, came to the opposite conclusion as the 2001 ROD, which promulgated the 2001 Roadless Rule, based on an identical factual record. Are there any new facts related to the Roadless Rule and the Tongass that hasn’t been brought up in earlier rounds of roadless rulemaking on the Tongass? Is the USDA able to provide a good reason that would satisfy the courts for why now, after the Roadless Rule has been in place on the Tongass since this ruling, that an exemption is valid and lawful? The USDA should consider that it is highly unlikely to avoid further litigation if any alternative besides Alternative 1 is chosen, and whether it is prepared to provide a reasoned explanation for why now they have changed their normative and policy judgements, knowing from the outcome of *Organized Village of Kake v. U.S. Department of Agriculture* (2015) that a change in executive administration and presidential priorities is not sufficient.

Additionally, in the midst of our climate crisis, it is utterly short-sighted and morally reprehensible to open more old-growth forests to logging when protecting these forests is one of our nation’s best defenses against climate change. The limited attention to how the impacts of this proposed rulemaking by contributing to climate change is another way in which the DEIS is inadequate.

The most important reason I support the No Action Alternative is because by listening to the people who live on the ground in Southeast Alaskan communities, this is what they are asking for and this is what they want.^[6] It is also what the American public has demonstrated they want, given that 90% of public comments received during the scoping period were in support of the No Action Alternative. I hope that the Forest Service and Secretary Perdue will realize this as well. If any of the alternative besides Alternative 1 is chosen, it signals that our representative democracy is not working, if a few individuals in positions of power can push through a rule that people in Southeast Alaska who will be affected and people who live across the United States who value their public lands do not want. How many times will the federal government ask citizens to reiterate what they want for roadless area management on the Tongass and disrupt the lives of Southeast Alaskans by forcing them to fight for the status quo of protection in the forests they call home? For a “[l]ong-term and durable solution” to this issue, there is a simple solution: do not change anything--keep the Roadless Rule in place on the Tongass.

[1]https://www.washingtonpost.com/climate-environment/trump-pushes-to-allow-new-logging-in-alaskas-tongass-national-forest/2019/08/27/b4ca78d6-c832-11e9-be05-f76ac4ec618c_story.html

[2]<https://www.hia-env.org/2019/10/30/hia-and-five-southeast-alaska-tribes-condemn-the-roadless-rulemaking-process/>

[3]<https://www.ktoo.org/2019/09/24/faced-with-an-important-decision-on-the-tongass-why-is-the-federal-government-supporting-alaskas-timber-industry/>

[4]<https://www.taxpayer.net/wp-content/uploads/2019/09/TCS-Cutting-Our-Losses-2019-.pdf>

[5]<http://www.seconference.org/sites/default/files/FINAL%20Southeast%20by%20the%20Numbers%202019.pdf>

[6]https://www.seattletimes.com/opinion/save-the-rare-wild-beauty-of-the-tongass-national-forest-from-renewed-logging/?fbclid=IwAR0PTd-0nf54aRcQJRM64eIFHoYJel1uZ3vnnH7TlcJHAERJ_OaeJI2kouE

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