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Comments: Alaska Roadless Rule public comment

Please include the attached letter as part of the public comment concerning the Alaska Roadless Rule.

The letter details the reasons why I favor the No Action alternative.

Thank you and happy holidays.

Lee Hart

Brand Amp

Anchorage, AK

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Lee Hart

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Re: Draft EIS Alaska Roadless Rule

Dec. 17, 2019

Southeast Alaska's beautiful scenery, abundant fish and wildlife, and expansive tracts of undeveloped lands attract visitors and recreationists in increasingly large numbers, with current estimates projecting 2 million out-of-state visitors in the coming years.

The Roadless Area Conservation Rule has provided effective protection both for wildlands and recreational opportunities for nearly two decades. Exempting the Tongass National Forest from this important national policy in favor of road building and timber harvest which would irreparably damage roadless areas and the recreation, wildlife, and tourism values they embody. This letter supports the No-Action Alternative to uphold the national Roadless Rule in Alaska for economic reasons listed below.

The DEIS identifies three [ldquo]key issues[rdquo]: 1) roadless area conservation; 2) support to local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors; and, 3) conserve terrestrial habitat, aquatic habitat, and biological diversity. Alternative 1, the No Action alternative which retains the existing Roadless Rule, best responds to these key issues. Today, tourism and fishing in the Tongass represent 26 percent of jobs in the region while the timber industry accounts for less than one percent of regional employment. US Forest Service analysis finds, "There is no data supporting the conclusion that circumstances have changed or are likely to change with regard to the market demand for Tongass timber in the near- or long-term future due to overall limited competitiveness of Tongass timber in domestic and export markets."

While the bulk of this protracted public debate is focused on timber, it's important to remember that lifting the Roadless Rule could also open the door to mining which presents another threat to sustainable recreation-oriented development.

Meanwhile, in a business climate survey conducted by Southeast Conference, recreational opportunities were cited as the #2 benefit to businesses who own and operate their businesses in the region. [ldquo]It is the reason people choose to live in Southeast, and the reason that tourists come to the area.[rdquo] The Southeast Conference report continues: [ldquo]Forest Service is actively cutting funds to Tongass recreation programs resulting in campground, trail, and public cabin closures. Work collaboratively to reverse this trend.[rdquo]

Even in communities with historical timber harvests, the value of outdoor recreation is recognized. Various economic reports from around the region by Rain Coast Data, a market research firm specializing in Southeast Alaska, include such notable findings as these:

- Access to recreation opportunities was rated as a significant benefit to operating a business by 70 percent of business owners on Prince of Wales Island.
- In Wrangell, local youth reported their top priority is to develop more ecotourism excursions.
- In 2018, visitors spent \$1.3 million on bear and glacier viewing around Wrangell.

The US Bureau of Economic Analysis finds Alaska[rsquo]s outdoor industry recreation sector is a powerhouse, accounting for 4.2 percent of state GDP. The BEA data finds Alaska has the seventh largest outdoor recreation economy in the United States. The industry is integrally tied to the success of the state[rsquo]s second largest economic driver: the tourism industry would not be nearly as robust if not for the bounty of wild landscapes and wildlife in the state. According to the Alaska Resource Development Council, tourism in Alaska is the second-largest private sector employer, accounting for one in eight Alaskan jobs, nearly 2 million visitors, and \$2.42 billion in direct visitor spending including labor income.

In addition, Alaska[rsquo]s pristine landscapes are an undervalued export commodity in their own right. The International Trade Center-United Nations World Tourism Organization and the US federal government considers tourism an export sector. All export sectors require infrastructure and in the case of outdoor recreation, infrastructure is defined by such things as trails, boat launches, public use cabins as well as sustainability-focused stewardship of the natural environment. In 2017 the ITC-UNWTO published a paper on National Tourism Export Strategies. It wrote: [ldquo]Most countries want to increase exports as a means of generating employment, increasing government revenue, and raising standards of living.[rdquo] If Alaska were to invest more in outdoor recreation, it too could realize such returns on investment.

Visitors are attracted to Alaska by various experiences often tied to the natural and vast characteristics of the landscape, wildlife, and culture of the state. For the majority of those visitors, Southeast Alaska and the Tongass National Forest is the top destination. There are many guided activities that provide a way for visitors to access these experiences and for local and multinational companies alike to conduct business here. Guided activities include sightseeing tours, whale watching, glacier viewing, flightseeing, wildlife viewing, hiking, ziplining, kayaking/rafting, and fishing. (Source: Travel Alaska, 2016, Things to Do). According to Alaska Department of Fish and Game, fishing alone accounts for \$652,498,723 in annual spending by non-residents including purchases of licenses, guides, equipment, and repair.

Thus, it can be argued that Alaskans and the American public would be better served in the Tongass by focusing Forest Service efforts where they are needed most:

- Creating new opportunities for recreation, hunting and fishing,
- Restoring damaged habitat for important and rare fish and wildlife species,
- Promoting wildfire resiliency.

Such action by USFS would support these Southeast Alaska 2020 Economic Plan visitor industry sector goals:

- Developing more infrastructure, providing access and ecotourism opportunities, trails, and wildlife viewing.
- Targeting Alaska residents for [ldquo]stay-cations.[rdquo]

- Developing more ecotourism products. Examples include scuba diving, surfing, glacier surfing, etc.
- Exploring opportunities to make our world-class whales and bear viewing more accessible to independent travelers.

The stated mission of the Forest Service is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. To advance its mission and serve its purpose, the USFS is charged with balancing the short and long-term needs of people and nature by

- ? Working in collaboration with communities and our partners;
- ? Providing access to resources and experiences that promote economic, ecological, and social vitality; and
- ? Connecting people to the land and one another.
- ? Delivering world-class science, technology and land management.

The high cost of road construction and maintenance in the Tongass is largely absorbed by the USFS, which already struggles under a \$3.2 billion maintenance backlog. Continuing to burden this system by adding more roads that will have the effect of either deferring more critical infrastructure maintenance needs, curtailing construction of new trails and cabins to keep pace with public demand, or will require additional appropriations from Congress.

Therefore, I conclude the preferred Alternative 6, full exemption from the Roadless Rule, will not create a long-lasting, durable solution for roadless areas in Alaska. Instead, I fear it will trigger legal challenges, business uncertainty, and ongoing conflict over balanced use of public forests. Special corporate interests and politics should not be allowed to subvert best practices in forest science and a robust public process citizens can trust to guide the Forest Service in developing land management policy and priorities. Alaskans were willing to consider compromises described in other draft EIS alternatives. However, faced with the preferred alternative, which completely lifts Roadless Rule protections across the entirety of the Tongass, I support the No Action Alternative.

Lee Hart

[Position]