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Comments:

December 19, 2017

Delilah Brigham

POW LLA Project Leader

Thorne Bay Ranger District

Tongass National Forest

dbrigham@fs.fed.us

Re: Prince of Wales Landscape Level Project Draft Statement of Issues and Alternatives

Dear Ms. Brigham:

On behalf of The Wilderness Society, we are writing to express our serious concerns about the Forest Service's Draft Statement of Issues and Alternatives for the Prince of Wales Landscape Level Analysis Project in the Tongass National Forest. Our comments focus specifically on the agency's shocking alternative to violate the Roadless Area Conservation Rule.

We strongly object to the Forest Service considering an alternative that blatantly "would allow young-growth and old-growth timber harvest in 2001 Roadless Rule Inventoried Roadless Areas?" (p. 5). This roadless area logging alternative -- Alternative 4 -- could include an incredible 570 miles of new permanent road construction and 450 miles of temporary road construction (p. 22), which is three times the amount of road construction that could occur in the two other action alternatives. Under Alternative 4, the Forest Service would log up to 475 million board feet over the next 15 years, compared to 115-200 mmbf under Alternatives 2 and 3 (p. 11).

Similarly, we are outraged that the Draft Statement impliedly invites the Trump Administration or Congress to overturn the Roadless Rule in order to allow the Tongass National Forest to implement the massive road building and roadless area destruction envisioned by Alternative 4. Implicitly acknowledging that Alternative 4 would violate the Roadless Rule, the Draft Statement states that timber production "would be deferred until agency rulemaking or an act of Congress modifies [the Roadless Rule] and the 2016 Forest Plan was amended to allow harvest within these areas" (p. 5). As the Forest Service is certainly aware, the draft Senate Interior Appropriations bill for FY 2018 includes two riders - Section 508 and 509 - that would do exactly what the Draft Statement suggests. The Wilderness Society and many other organizations from across the United States have banded together to oppose this unprecedented political attack on the Roadless Rule.

By declaring its willingness to consider the roadless area destruction described in Alternative 4, the Forest Service is inviting immense conflict and controversy for itself and the Tongass National Forest. Moreover, analyzing an alternative that is not legally viable carelessly wastes taxpayer money and is an absurd allocation of resources for a cash-strapped agency. We strongly urge the Forest Service to reconsider its current path and eliminate from consideration Alternative 4 and any other alternative that in any way would violate the Roadless Rule.

Sincerely,

Michael Anderson
Senior Policy Analyst
The Wilderness Society

Nicole Whittington-Evans
Alaska Regional Director
The Wilderness Society