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Comments:

This letter is request that the Roadless Rule regarding the Tongass Forest and Land Management area remain intact, and to request that the conversion of old-growth forest to new-growth forest is prohibited. The request to remove the Roadless Rule based on the redundancy of the overall Roadless Rule is a moot point. If both rules provide equal protection to the Tongass Forest, then there is no need to remove either protection.

It is opined that timber harvesting from the Tongass should not be permitted. It is argued by proponents of timber harvesting that the local communities would benefit economically from the harvesting of timber. It is in fact apparent that local indigenous peoples throughout the past several thousand years did not participate in extensive timber harvesting for commercial purposes. It is certainly acceptable to offer indigenous peoples exceptions to a ban on timber harvesting. If indigenous peoples are requesting harvesting of limited amounts of timber to sustain ways of living that have occurred over the millennia, that should be permitted.

Transitioning old-growth forest to new-growth forest is absolutely unacceptable. Please provide a 75 year moratorium on the transition to new-growth forest. This will provide an opportunity for subsequent generations to make forest sustainment decisions. Instead, a forest management and timber harvesting program based on the Menominee Forest Practices implemented by the Menominee People in Wisconsin would be very acceptable. Another example of forest management that would be acceptable is the model used in the Wildwood Ecoforest of Vancouver Island. This forest has been sustainably managed by one individual and subsequently by the Wildwood Management organization for 80 years. In that time, the forest has produced as much timber as if it would have been cut down (converted to new-growth forest) 80 years ago, and the forest abounds with trees that are hundreds of years old.

In conclusion, I petition to retain the Roadless Rule as it applies to the Tongass, and to prohibit conversion of old-growth forest to new-growth forest.

Thank you for considering this comment in your decision making.