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Comments:

The new Alaska Roadless Rule should protect all inventoried roadless areas on the Tongass currently protected under the 2001 Roadless Rule, including roaded roadless areas. In addition, under the new rule all T77 watersheds and TNC/Audubon ecological priority areas that are currently not in inventoried roadless areas should be protected from old growth harvesting and road building.

There are a number of reasons why the Tongass should not be logged or developed. It supports healthy salmon populations that are vital for the continuing health of the entire ecosystem. It is essential for the fishing and tourism economies in Southeast Alaska. It is one of the last temperate coastal rain forests in the world, and as such is a unique place that should remain pristine. It is a national and cultural treasure for all Americans. Further, the inventoried roadless areas are the traditional and unceded territory of the Tlingit, Haida, and Tsimshian people and should be preserved for customary and traditional use by tribal citizens and rural subsistence harvesters. Finally, the Tongass is the most important national forest for carbon sequestration and climate change mitigation.

With the above considerations in mind, the Forest Service should protect the Tongass from logging and road building, focusing instead on watershed restoration. It should also conduct a comparative analysis of regional revenue and employment from commercial fishing and visitor industries, versus the timber industry. I would suggest further studies as well: a study of the socio-economic impact of subsistence hunting and fishing for Southeast Alaska residents; a quantitative assessment of the socio-economic benefits of carbon sequestration; a report on opportunities/possibilities for the Tongass to participate in state, national, and/or international carbon credit programs; and related to that, a quantitative assessment of the socio-economic benefits of carbon sequestration.