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Comments:

This is a Comment on the U.S. Forest Service's Notice of Intent to Prepare an Environmental Impact Statement on the Roadless Area Conservation Rule in Alaska's national Forests. Specifically, I am concerned as to how this intent could harmfully impact the Tongass national Forest, America's largest and the healthiest, ecologically most significant temperate rain forest on earth. Removing the protections of the Roadless Area Conservation Rule (Roadless Rule) within the Tongass bodes badly for the future of this vital biological resource for our country

Here are some reasons why the Forest Service should abandon this process, and keep the Roadless Rule in Alaska's national forest at the status quo:

1 The federal government spent considerable funds prior to adoption of the roadless rule to research the need and prepare this rule, and the Rule has worked well. No change is called for. Setting up a complex new EIS-preparation process is a total waste of taxpayer moneys.

2 The Courts have reinstated the Roadless Rule on the Tongass, setting aside previous unwarranted attempts to exempt the Tongass from the Roadless Rule. Clearly, it is not in the national interest to try, yet again, to exempt the Tongass from the Roadless Rule.

3. The Tongass is a NATIONAL Forest, belonging to all Americans and not subject to the whims of the State of Alaska, which claims to want to "manage" Tongass timber via a current management plan, ignoring the realities and the benefits of the Roadless Rule. The current Tongass Management Plan is not in contradiction with the Roadless Rule. The Roadless Rule is enormously popular nationwide, winning support from millions of Americans when originally adopted nearly 17 years ago and again later when threatened with rollbacks.

4.The reason the Tongass Forest is so biologically healthy and so ecologically significant is because it still has large, unfragmented areas of roadless forests. Exempting the Tongass from the road-building prohibitions of the Roadless Rule would take away this assurance of continuing ecological significance. Road construction is the single most detrimental activity to the biological sustainability of wild forests.

5. The Forest Service in Alaska has begun and is a long way along the crucial process of moving to smaller-scale, 2nd growth logging, and to change that now and reverse these carefully-planned and implemented transition adjustments would be a slap in the face of the agency's staffers in Alaska who have worked hard toward this transition, -- and a hardship to the communities that are transitioning to smaller-scale logs and 2nd growth jobs.

6.The principal likely disposition of additional old-growth logs that might be cut without the prohibitions of the Roadless Rule would be to sell them abroad, particularly in the Pacific Far East. The U.S. Forest Service is under no obligation to cater to the wishes of foreign governments for cheap timber; on the other hand the agency IS under a real, fundamental obligation to Americans to guard their largest roadless temperate rain forest as a sustainable resource - and not to waste its valuable forests.

7. Tourism in Southeast Alaska is largely dependent on the beauties of a forested land and seascape; tour ships and visitors do not come to see the shaved, scarred hillside of a landscape criss-crossed with logging roads and clear cuts emanating from them.

8. Our nation's remaining roadless areas are all-too-rapidly disappearing, and this protection initiative can provide the essential steps to halt the loss of natural ecosystems, the loss of pristine wildness. The Forest Service can do a great service to the public by maintaining its commitment to roadless area protection. Tongass contains some of the last remaining old-growth temperate rainforest in the world, and its value in providing clean water and vital fish and wildlife habitat is essential to the economic and ecological health of Southeast Alaska.

9. The environmental values of intact roadless forests are distinctly far greater than the monetary value of any timber obtainable from these roadless areas -- especially considering the roadbuilding subsidy for timber roads which the federal government incurs -- and which is paid indirectly, unjustly by taxpayers around the country.

10. Because logging and developing roadless areas is so uneconomic in Southeast Alaska, and the Rule already allows public roads, utility connectors, and access to inholdings (including mines), its application in Alaska does not interfere significantly with community growth or projects in the legitimate public interest. There is no justification for exempting the Tongass.

11. The Roadless Rule has helped control the Forest Service's multi-billion dollar road maintenance backlog, and protects water supply for communities. The value of the Roadless Rule in preventing environmentally damaging and economically wasteful road-building and logging is particularly relevant in the Tongass, where logging costs vastly exceed timber revenues and require unconscionable taxpayer subsidies.

12. More than ever, in this time of Climate Change, the carbon-absorbing qualities of old-growth, unfragmented forest are essential to maintain.

I have visited Southeast Alaska and admired the Tongass Forests for its thrilling wildlife and biological integrity many times. It is time for our country to learn from the irrevocability of ecological losses elsewhere and do better in Alaska. Yes, they used to think passenger pigeons would go on forever. Thus it is with Tongass roadless areas. Protect them while they remain. Now.

I urge you to keep the current protections for our 'inventoried roadless areas on national forests in Alaska.

Thank you for considering these comments

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