

Date submitted (Alaskan Standard Time): 10/15/2018 7:40:48 PM

First name: L.

Last name: Wilson

Organization:

Title:

Official Representative/Member Indicator:

Address1: 543 Parker Ave.

Address2:

City: Decatur

State: GA

Province/Region:

Zip/Postal Code: 30032

Country: United States

Email: Ocngrl@gmail.com

Phone:

Comments:

Honorable Sonny Perdue, Secretary of Agriculture,

Regarding the nature and scope of the environmental, social, and economic issues related to Alaska-specific rulemaking that should be analyzed in depth in the Draft EIS required under NEPA, I do not support the proposed rule or an additional environmental impact statement that wastes taxpayer dollars to repeat the 2016 Tongass Land Management Plan.

Far from harming the fishing and tourism sectors of the economy, these sectors have thrived under Roadless Rule protections. Together, tourism and fisheries account for over 40 times the number of jobs and more than 27 times the total earnings that timber contributes to the Alaska economy.

The Roadless Rule is not the reason why today's timber industry represents far less than 1 percent of Southeast Alaska's jobs. For the past 65 years, the timber and logging industry systematically clearcut nearly 1 million acres of the biggest and easiest to reach old-growth forest. This must stop. Only sustainable new growth forests should be a part of the timber industry future.

Today, over 5,000 miles of logging roads crisscross the Tongass National Forest, fragmenting valuable wildlife habitat, threatening salmon by blocking fish passage, and serving as the primary source of sediment into fish streams. Spending millions to build roads in Tongass roadless areas makes no economic sense. Projects have already been approved in Roadless areas for hydropower, mineral exploration and other energy development.

As the State of Alaska's own economic experts explained 15 year ago, Tongass timber is uncompetitive because of permanent and fundamental changes in global timber markets, high labor costs, distance from markets, and less expensive substitutes. No amount of environmental studies or new roads or taxpayer subsidies can alter the economic reality facing today's Tongass timber industry - Tongass logs cannot sell at a price high enough to cover operating costs.

I support the continuation of current management of the Tongass National Forest in Alaska in accordance with the 2001 Roadless Rule. The Tongass National Forest is unique from other National Forests in respect to the size of the Tongass National Forest; the large percentage of roadless areas that comprise the Tongass National Forest; the degree of dependency of local communities on federal lands (the Tongass National Forest comprises almost 80% of southeast Alaska); as well as Alaska and Tongass National Forest-specific statutory considerations (e.g., Alaska National Interest Lands Conservation Act (ANILCA), Tongass Timber Reform Act (TTRA)).

In closing, the scope of any EIS should be limited and take into account the work previously done to arrive at the current regulation. Focus on tourism and commercial fishing, which together generate more than \$2 billion in revenue annually and employ more than 10,000 people in the region.