

Date submitted (Alaskan Standard Time): 10/15/2018 10:46:43 PM

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The argument that there should be a state-specific approach to management of the Tongass National Forest can be justified by the uniqueness of its conditions. The Tongass National Forest is the nation's largest and one that an uncommon number of local communities depend upon, including Tribal citizens who have depended on and been stewards of these lands since time immemorial. However, while this rulemaking process presents a significant opportunity, it simultaneously presents a threat. I attended the public meeting hosted by the Forest Service in Sitka on Sept. 24, 2018; from listening to the testimony of the many invested community members who took their time to attend the meeting to obtain information about this process and raise their voices through hard-hitting questions and thoughtful concerns, it was clear to me that the people who live here and call the Tongass National Forest their home are extremely and rightfully concerned about the possibility that this rulemaking process initiated by the State of Alaska will ultimately lead to fewer restrictions on timber companies and a consequent increase in logging in the Tongass. This is an outcome that I consider unacceptable. This is not to say that economic development is not an important goal nor that there should be no logging in the Tongass; however, what is reasonable is that the most intact and pristine parts of the Tongass should remain that way, and that the goals of the timber industry should not be pursued at the expense and detriment of other industries, such as fisheries and tourism, which contribute much more significantly to the livelihoods of many people living in Southeast Alaska. The mission of the Forest Service is to "sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations." These goals must continue to be upheld in Alaska, the last great frontier of wilderness in our nation, and the needs of present and future generations of those living in Alaska depend are best served by management rules that protect the integrity of the Tongass National Forest.

As this Environmental Impact Statement moves forward, I urge the Forest Service and the USDA to consider the option of maintaining the roadless rule in the Tongass (the no-action alternative), and also to consider options in which the rules protecting old growth timber and the incredibly valuable resource of intact forest are actually strengthened. My greatest concern about this rulemaking process that I would consider incredibly unjust is the fear that this process will be biased towards lessening the restrictions and opening up the Tongass to more logging from the beginning. It is the assumption of many that the State of Alaska's interest in a state-specific roadless rule exemption is to ease the restrictions set out in the Roadless Rule, most likely for the political and economic gains that would come to certain people and corporations connected to power. In terms of the costs and benefits, I do not see the advantage of allowing greater freedom of road construction in roadless areas in the Tongass to any stakeholders besides those who stand to profit by harvesting more timber. I do not see any advantages to the local communities who depend on the Tongass for their livelihoods from everything to supporting pristine habitat in rivers that support healthy fish populations and forests where people can hunt and gather wildlife and plants for subsistence. The principles of environmental justice demand that people have a right to participate in the decision-making processes that affect the natural resources and environment that they depend upon. The people who live in the Tongass National Forest and Southeast Alaska, as far as I can tell, are completely content with the roadless rule. I argue that the Forest Service has an obligation to take into special consideration the impacts that altering the roadless rule in the Tongass National Forest will have on the people who most closely depend on it in the development of this EIS.

Due to humanity's voracious historical and current consumption of natural resources, old-growth timber is a limited resource that has become extremely rare in our country and our world. In the U.S., our National Forests, and especially the areas that remain relatively untouched by development (roadless areas), are some

of the last places where old-growth trees can be found and where ecosystems still thrive as they do without excessive human interference. These are the places where ecosystem services, from the provision of fish and wildlife to water purification and carbon storage and nutrient cycling, are the most valuable. All across our planet, vital natural resources are being depleted and critical systems are being interrupted by the global threats of climate change and habitat loss. We cannot afford to compromise the integrity of the Tongass National Forest. From a global perspective and the perspective of those who live, breathe, hunt, fish, gather, and recreate in the Tongass National Forest, the cost of diminishing the health and vitality of the Tongass ecosystem is too high. I sincerely hope that the EIS to be prepared by the Forest Service reflects these realities and respects the opinions of the people who have the greatest stake in the future of the Tongass.