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Comments:

Alaska Roadless Rule Comments:

As a born and raised SE Alaskan currently employed in the Visitor Industry I have major concerns about this project including harm to the #1 and #2 economic drivers in SE Alaska, illegal sublimation of subsistence priority mandated by Alaska state constitution + ANILCA and possible improper execution of MOU process by the state of Alaska.

Tourism and Salmon depend upon Roadless Areas

#1 KEY ECONOMIC DRIVER - In SE Alaska and the Tongass National Forest the Visitor Industry in 2017 accounted for 17% of regional employment and 24% of all private sector jobs. Those working in the visitor industry earned \$231 million in 2017 or 11 percent of all regional employment income. SE Alaska and the Tongass are the most visited part of Alaska, with two-thirds of all tourists coming to the region. One-third of all Alaska visitor spending occurs in SE, where visitors spent an estimated \$657 million in 2016. The visitor industry has the strongest outlook of all SE Alaska industries - along with increased visitors, the number of jobs and associated income in the sector will continue to rise. (Southeast Alaska by the Numbers 2018, Southeast Conference Publication by Rain Coast Data: <http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202018%20FINAL-compressed.pdf>)

Word of mouth recommendations trump all other methods of motivating travelers. In a recent national survey forty-two percent of travelers recommend Alaska due to extraordinary/exceptional beauty quickly followed by 23% who list wild/untraveled/unspoiled/untouched as their top reason. ("When in Nome: An Outside Perspective on the Last Frontier" Presentation for Alaska Travel Industry Association Oct. 2018, David Bratton-Destination Analysts). This is fully 65 percent of the most effective marketing tool available to Alaska. The state must continue to grow and develop its visitor brand while recognizing the main attribute drawing travelers is the unspoiled and untouched nature of Alaska.

While the Visitor Industry encompasses both recreation and fishing activities on the Tongass National Forest, SE Alaska timber industry contributes less than 1 percent of total employment-related earnings to the region with the mining industry slightly higher at 4%. Second-strongest economic driver in SE Alaska/Tongass Forest is the Seafood Industry making up to 8% of jobs in regions and 10% of earnings. (Southeast Alaska by the Numbers 2018, Southeast Conference Publication by Rain Coast Data: <http://www.seconference.org/sites/default/files/Southeast%20Alaska%20by%20the%20numbers%202018%20FINAL-compressed.pdf>). Conclusion: Roadless areas are the foundation for SE Alaska's thriving economic drivers. An Alaska specific roadless rule threatens the continuing growth of SE Alaska's new economy. Stringent economic analysis must be included to account for these new financial realities.

Further robust cost analysis to taxpayers must reflect that the Roadless Rule had no impact for the eight years the Tongass was exempt on the timber industry. The judge who presided over the Alaska Lumber & Pulp Company's lawsuit against the Forest Service found evidence proving the declining pulp market drove ALP out of business in the company's own records of internal meetings. From 2008 through 2013, the Forest Service spent \$139.1 million for timber sales in the Tongass that brought returns of only \$8.6 million ergo taxpayers lost 93 cents for every dollar spent. The economics of building roads to access timber is still not profitable. In fact, current roads are not being maintained adequately.

#### Subsistence, customary / traditional cultural activities and the sacred

The Alaska state constitution mandates a subsistence priority as does ANILCA, although there is some friction on the rural designation. By keeping wildlife habitat unfragmented roadless areas protect healthy subsistence opportunities. Robust evaluations must be completed for deer, bear, goat, moose and wolf habitat interruptions as well as whole eco-system studies. Studies need to include effects of sediment runoff and culvert construction, non-maintenance of current roads and timber slag on salmon spawning streams and beds. Further, economic weight must be given to these evaluations as they weigh on local economics, as well as looking at public health issues for communities of interruptions to customary and traditional cultural activities and sacred spiritual sites. Some of this may be mitigated by cooperating agencies but those with corporate business interest must be weighted appropriately to reflect financial incentives to minimize affects on above listed factors.

#### Concerns with State of Alaska MOU process

Under the Statehood Act, Alaska agreed to "forever disclaim all right and title to" Tongass National Forest and all other federally owned lands. There must be a legal review and statement of finding on whether this proposed rule, or the MOU violate that agreement. The process of creating the state advisory board did not go far enough to adequately represent visitor industry/tourism, the #1 economic driver in SE Alaska. Tourism lacks equal representation on advisory board when weighed against other industries. This is non-representative of the economic facts laid out earlier in comments. Further it has been publicly stated that this advisory board has been instructed to address only one pre-determined alternative.

Mitigating Factors that support either a "no action alternative" or a "stricter action alternative":

1. Inventoried roadless areas covered by the 2001 Roadless Rule comprise 55 percent of the Tongass which means that there is an ample 45% outside the rule to meet the USFS mission.  
(<https://www.fs.usda.gov/roadmain/roadless/alaskaroadlessrule>)

1. There are already exemptions for roads for communities, hydropower and utility corridors and mining, etc. According to the USFS as of March 2017, 53 projects within the roadless area in Alaska had been submitted, and all were approved, typically within a month of submission. This includes 34 mining projects, 10 hydropower or utility connection projects, roads and a geothermal lease.

1. The Tongass National Forest plays a vital role in excess carbon capture helping to mitigate some of the impact of climate change.

1. Proposal undercuts free market determination of winners and losers by heavily subsidizing the timber industry at the cost of other sectors of the economy.

1. Cost of building and maintaining roads greatly exceeds the value of the timber and requires federal taxpayer subsidies.

The current 2016 Tongass Land Management Plan was developed by local managers with the input of Southeast Alaskans through a rigorous public process and appropriately addresses the Roadless Rule and concerns of a "one-size fits all" over-reach argument by Alaska and its congressional delegation. The needs and purpose of this project have been met through TLMP. I fully support no action or stricter action alternatives.

Warm regards,

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Alaska resident

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