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Organization:

Title:

Comments:

My name is Anthony Shepard and I live in Shrewsbury, Massachusetts.

I am writing this letter to express my deep concern of the proposed rule for exempting the Tongass National Forest from the infamous 2001 Roadless Area Conservation Rule, which prohibits tree harvest and road construction/reconstruction within inventoried roadless areas. This proposed rule also provides a procedure for correcting and modifying roadless area boundaries on the Chugach National Forest. Both of these national forests are treasured lands, in terms of the landscape, wildlife, resources and economic activity, they provide a variety of crucial benefits to the state of Alaska and the federal government.

The Tongass is the largest national forest in the United States, spanning over 17 million acres of Alaska's land, but only 58% of its cover is actual forested areas. It is home to many different ecological settings and provides habitats for a variety of fragile and important keystone species, terrestrial and aquatic alike. The introduction of this proposal presents a grave danger to these lands that are supposed to be protected and preserved. The timber industry has shown us all in the past how destructive it is to the environment and the severe impacts it can have on the landscape and natural ecological processes across many different regions.

Although the Tongass has special circumstances in its national forest status and management, it appears to be best managed through the local planning processes. This is generally true for forest management based off of legislation like the Organic Act, MUSYA and NFMA. The Forest Service has forty years of experience with forest planning systems under NFMA and demonstrates its capacity to provide balance between multiple use and sustained yield. Unfortunately, in an area with such important ecological activity, a proposal of this magnitude threatens the very public lands this agency is supposed to protect and conserve.

Through the Draft Environmental Impact Statement (DEIS) the analysis indicates that the removal of roadless designations in the Tongass National Forest would not cause a substantial loss of roadless protection. The proposed rule would effectively bring only 185,000 acres out of the 9.2 million designated as roadless areas into the set of lands that may be considered for timber harvest. However, any further timber harvesting and introduction of human activity can have severe and lasting impacts on more than just the 185,000 acres proposed for timber harvesting. Human activity has clearly shown in the past how devastating it can be to natural ecosystems and the ecological activity within them.

I strongly support the no action alternative 1 to this proposal because ensuring that the Tongass and other Alaskan national forests are conserved and protected is crucial to ensuring the stability of the habitats and wildlife that resides there. Although the proposed rule would not directly authorize any ground-disturbing activities in these lands, they can open the door to very dangerous extractive activities that will put these national forests in grave danger. This proposal has the potential to cause habitat destruction/fragmentation, deforestation and have a significant impact on wildlife and resources in this area by the timber industry and human activity. Any other alternative than no action would ignore the overwhelming public opinion on this matter and would in turn, harm Alaskans, including Alaska Natives and taxpayers across the nation.

The 2001 Roadless Rule was designed to limit human intrusion on public lands and thus limiting the effects of human activity, resource extraction and the timber industry. Although the forest service's adoption of multiple-use and sustainable yield allow for timber extraction, it must be limited and balanced in areas with such fragile ecosystems that remain untouched by humans. The proposal would remain in compliance with the Tongass Timber Reform Act of 1990, which provides an annual supply of timber to meet market demand while following the principles of multiple use and sustained yield of renewable forest resources. The alternatives considered in the DEIS for the roadless rule in the Tongass can influence the potential location of future timber harvesting, which could be detrimental to certain ecosystems in the Tongass. Other alternatives being considered examine different land areas and current timber restrictions in order to increase management flexibility for how timber harvest goals can be achieved. However, this proposal and potential for extractive measures can have a severe impact on the Tongass and Chugach National Forests. This is why I oppose the alternatives and support the notion to keep the rule in place unchanged.

Thank you for taking my comments into consideration.

Best regards,Anthony Shepard

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