

Date submitted (Alaskan Standard Time): 12/3/2019 12:00:00 AM

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Organization:

Title:

Comments:

I support the Forest Service's Alternative #1: do nothing. I oppose all other alternatives.

For the record, I live in Colorado, and opposed Colorado getting a roadless rule exemption several years ago. Our national forests are public lands, owned by all Americans. They are not state-owned lands, and giving states too much control tends to lead to too much development.

Your Key Issues 1, 2, and 3 in the EIS cover the issues pretty well. The Tongass is a national treasure, one of the largest and most pristine temperate forests in the world. It doesn't really need "management". It should be left alone except for very low-impact recreational, hunting, and fishing activities. Aside from the pressure exerted by a president who understands nothing about the environment nor about atmospheric science, why is there a chapter titled "PURPOSE OF AND NEED FOR ACTION". There no need for action, this "need" has been manufactured by the current administration.

We must stop cutting old growth forests at some point...in the worst case, because there will be no more. Similarly, we have to stop putting new roads through wild areas at some point...again, in the worst case, because we've left no such areas. I prefer that we stop well before then, and consider the Tongass a bulwark against such development. If we can save the Tongass, perhaps we can still save (or restore) other areas as well. Yes, I understand that large portions of the Tongass are no longer old growth, and that some small portions have roads in them. But with time, those younger trees will grow into older trees, and the roads will slowly disappear.

The increasing urgency of doing something about climate change also argues for leaving the Tongass as is. I've been tracking this issue with mounting concern since the 1980's. Climate scientists' predictions have been much more accurate than politicians...and even so some changes are happening faster than anyone predicted. I am particularly concerned about the effects of arctic peat bogs melting, releasing an ungodly amount of methane. Every study I've seen comparing carbon sequestration of old growth vs. younger growth forests shows the old growth forests winning handily. We lose credibility when we try to pressure other countries to stop cutting their forests, when we ourselves keep cutting ours. And we will need large corridors of wildness to allow animals to migrate northward as temperatures increase. Preserving the Tongass as is supports all these goals.

I find it completely unconvincing that something needs to be done simply because Alaska has been pressing for it. They lost their case in the Ninth Circuit on July 29, 2015. On March 28, 2016, the Supreme Court declined to take on Alaska's appeal of that decision, which seems to be an important piece of information missing from your summary. These two decisions reinforced the settled rule that federal agencies cannot arbitrarily change policies and ignore previous factual findings simply because a new president has taken office. Alaska lost again when on September 21, 2017, the D.C. circuit threw out their continued attempts to overturn the 2001 rule.

I further have no desire to return to the days of the government subsidizing private extractive industries in the Tongass. Well before the 2001 rule, the Forest Service was spending far more to support such industries than it received from said industries...including a mill owned by a Japanese consortium. I found one estimate that said that in some years, the Forest Service lost 98 cents of every dollar spent supporting logging infrastructure. None of Alaska's federal senators nor representative denied that the Forest Service was operating at a loss in the Tongassthey all said this was justified in order to create jobs. At least if the 2001 rule remains, we don't have to worry about another black hole for our taxes to fall into.

And I'll further note that southeast Alaskan timber has always been marginally economically successful, suffering boom and bust cycles, bankruptcies, and fines for egregious violations of pollution regulations. Since the 2001 rule, local economies have diversified away from logging into more stable bases of income. There's no good reason to reverse that progress.

And although comments on EIS's are not popularity contests, note that the original 2001 rule received 1.6 million comments, 85% in support of leaving the Tongass roadless more support than any other regulation in history.

I find that there are no compelling scientific or environmental reasons to exempt the Tongass from the existing roadless rules in effect, and very little economic justification. I especially find no good reasons to toss the whole ball of wax over to the state of Alaska, as in your preferred alternative. Please implement Alternative #1, leave the Tongass alone.

Thanks, Joel McCormack

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