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Comments:  
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Alaska Roadless Rule.

These comments are on the Roadless Draft EIS.

The Tongass war will continue as long as there is no identification of acres for economic development to sustain the economic viability and infrastructure of the communities of SE Alaska. Tourism and Fisheries the 2 largest components of the SE economy do not provide steady family wage year round jobs and are below the potential of the timber related resource development.

The Roadless Issue is just one more battle in the war over management of the Tongass. There has been 6.5 million acres of the Tongass identified for single use Wilderness Management. There must be enough acres identified for Forest Management to support a significant timber industry that provides year round jobs and supports manufacture of the timber harvested from these acres.

Selection of Alternative 6 is a good start in restoring the timber industry as the 3rd leg of the economy of SE Alaska. The restoration can be designed to compliment the existing Fishing and Tourism components of the economy. The current industries are now utilizing the benefits of past timber industry infrastructure development and will benefit further in the future if the environment for timber harvest is restored.

In order to create the conditions to support a sustainable significant timber business environment there must be a reliable economic timber supply. This starts with an adequate number of acres dedicated to Regeneration Forest Management with the priority purpose of producing economic timber in perpetuity.

Best estimates of the number of acres needed to make this happen range from 1.3 to 2.0 million acres. There acres should include at least 2/3 of the existing second growth acres that have been developed to date. To be successful these acres must have the following characteristics:

- 1) Lands capable of producing at least 30MBF/acre
- 2) Managed for timber production using Regenerative Forest Management
- 3) Be subject to the State of Alaska Forest Management Act requirements.
- 4) Not subject to NEPA requirements that conflict with Regeneration Management
- 5) Be under management that must generate positive returns in order to succeed,
- 6) No Government grants or funding, must be self sufficient.
- 7) Must support manufacture of the timber harvested from select acres.
- 8) Provide year round job opportunities.

Lessons of the past must be remembered in pursuing a solution to the Tongass War. There are elements of the public that have a goal of removing timber harvest from the Tongass. This must be remembered in selecting members of the public to participate in collaborative efforts in deciding the direction of the future on Tongass management. It takes only one dissident group to file appeals and bring law suits to destroy honest collaborative efforts. There are several efforts that have been made to come up with a solution that has a place in the management of the Forest for timber harvest. History shows that all that results from these efforts is a

shrinkage of the timber supply and an increase in acres removed from the timber base. The risk of continuing down this path is loss of the remaining timber infrastructure which includes loss of the tools necessary for forest management.

The preferred alternative 6 is a step in a direction that will restore hope that perhaps there is a turn around in management of the Tongass that will restore a balance that will allow for timber and other resource development. This is needed to strengthen the economy and restore jobs. The path that has been followed in the past 10 years will result in elimination of the timber industry in SE Alaska.

[Signature]

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