

Procedural and NEPA Concerns

Notification: Not Enough Time to Review

Commenters only received the most recent DEIS a couple of weeks before the hearing which was not enough time to sufficiently review such a substantial document. Decisions of this magnitude should not be made quickly but discussed and decided over a longer period of time.

Petition and Scoping

Commenters find that there is a perceived impropriety associated with how this change came about between the governor and president. The State's petition to initiate this rulemaking process was filed under false pretenses and did not involve any public scoping. The change feels highly political in nature, an overreach motivated by outdated, timber-specific economics. Locals want decisions made by professional land managers informed by science and the best available information, not politics.

Involvement: Native Tribes Must be Heard

Native Tribes, organizations, and people should be consulted in this process, and deserve to have their opinions heard and included in forest use and management plans. Although the comment period and hearings allow for comments to be brought forward, there is a distinct sense based on past actions that the opinions brought up in these do not matter and that native peoples are marginalized. Locals do not feel properly supported, represented, heard, or understood when it comes to these kinds of regulatory changes.

Involvement: Control Should be Local

Control of current and future land management should be held locally, and decisions like this should be made with extreme caution. Local community-based decision-making is the best way to ensure locals are both heard and rights are protected. When the region was managed locally there was a balance that has been disrupted in more recent years and generations.

Involvement: Improved Communication is Needed

The Federal Government needs to do better in engaging local communities in land management plans much sooner in the process. Government-to-government communications are not strong. Delaying engagement until this late in the process is both offensive and does not show a sense of cooperation or acting in good faith.

Involvement: Tribal Government Sovereignty

The process has not respected the sovereignty of tribal governments and its citizens. Tribal governments were not meaningfully engaged as full partners in the decision-making process and were instead treated as a cooperating agency and brought in after decisions were already made. Tribes have continually requested and been denied government-to-government consultation, particularly on issues impacting the land tribes depend on for physical, cultural and spiritual sustenance.

Hearings: Overwhelmingly Negative Response

The response from subsistence communities at these hearings on the Roadless Rule have been overwhelmingly negative with regards to the proposed rule. This is consistent with community response from several previous hearings on the proposed changes to the Roadless Rule. Considering the fact that locals continue to be highly against the rule change, does that matter in the eyes of the law, or is that meaningless?

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Hearings: Difficult to Attend

It should be noted that commenters found that attending hearings in person was very difficult. For some people there were issues of distance, access, and scheduling. As such, the large turn-out of community involvement should be noted as an indication of how passionate the communities are about this topic.

Proposed Rule Impacts on the 2016 Forest Plan

It is not clear based on the rule change whether areas designated by the 2016 Forest Plan as “old-growth habitat area” would remain protected under the roll-back of Alternative 6 (e.g. Chicken Creek area).

Proposed Rule Impacts TLMP Processes

The TLMP is renewed every 10-15 years. Without Roadless Rule protections, what will prevent future changes in the TLMP that allows logging and development in other parts of the Tongass not affected by the current proposed rule change.

DEIS

DEIS is Categorically Flawed

The impacts analysis for all alternatives is entirely flawed and needs to be reevaluated. The basis for estimating volume of forest harvested and the assumed definition of so-called “detrimental impacts” illustrate a fundamental misunderstanding of the local resources and ecosystems. For example, a GIS analysis conducted by a member of the Kake community found that over 6 million acres of key ecologically important areas would be impacted from the proposed change, which is quite different from what the Forest Service produced in the DEIS.

DEIS is in Conflict with Existing Research and Science

The Forest Service is well aware of the impacts of clear-cutting old-growth forests on deer and deer habitat (recall and the 1989 Tongass Land Management Plan and associated lawsuits). The same is true for the impacts on fisheries, for which attention is called to the Alaska Department of Fish and Game 1985 technical report “Impacts of Clearcut Logging on the Fish and Wildlife Resources of Southeast Alaska”, and the USDA Forest Service 1982 technical report “Influence of Forest and Rangeland Management on Anadromous Fish Habitat in Western North America: Timber Harvest.” The negative impacts from these reports clearly state that logging causes landslides, mudslides, sediment loading into streams which covers salmon eggs, impacting fisheries and those systems dependent on them. The DEIS seems to disregard this information in its impact analysis.

Ecological Succession Not Accurately Characterized

The DEIS does not properly capture the timeline and processes of ecological succession associated with old-growth forests in the Tongass. For example, clear-cuts from previous logging activities are now in the “stem exclusive” phase which means there is limited understory and still no good habitat for deer to return to. Stem exclusion lasts some 50-150 years, with old-growth forests not returning to climax communities again for 200-300 years. The impact of this timeline on deer habitats and populations is multi-generational on both deer and the subsistence communities who rely on them.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Inadequate Analysis of Impacts to Geology

The historical and cultural context of local communities being tied to specific geographies is not appreciated or understood by outside parties like the Federal Government. Damage to communities as a result of exempting the Tongass from the Roadless Rule has not been adequately or critically explored in this context. There are key archeological and ancient tribal lands, unsettled traditional lands, sacred sites, and the cultural significance of specific practices such as being the caretakers of the land which cannot simply be relocated geographically.

Inadequate Analysis – Climate Related Effects

Inadequate analyses were conducted to determine how the proposed rule change will directly and indirectly impact carbon stores and sequestration, as well as the resulting environmental and economic damage from the acceleration of climate change resulting from exemption of the Tongass National Forest. The impacts of climate change are already being felt locally, so the future impacts are likely to be amplified.

Inadequate Analysis – Loss of Aquatic Habitat

The impact of the rule change on aquatic ecosystems (both freshwater and saltwater) is not adequately analyzed in the DEIS.

Inadequate Analysis – Traditional Diet

The DEIS does not provide specific impacts of the rule change to the comprehensive elements of the traditional subsistence diet which can include: deer, seal, salmon, King salmon, Dog salmon, halibut, crab, oysters, herring, pinto abalone, berries, beach asparagus, beach greens, sea vegetables, shrimp, rockfish, fiddlehead ferns, mushrooms, seaweed, medicinals (sundews, usnea, devil's club, yew berries, golden thread), and fresh water.

Inadequate Analysis – Loss of Forest Habitat

The impact of the rule change on the rainforest ecosystem is not adequately analyzed in the DEIS. This includes specifics such as: impact of habitat fragmentation, capturing the true life-cycle of ecosystem succession and the length of time required to re-establish climax communities.

Inadequate Analysis - Impact on Subsistence Communities

There has not been an adequate assessment of the cumulative economic loss of deer to subsistence hunters over time. The Forest Service should analyze these cumulative effects to calculate and disclose the impacts of changing the Roadless Rule.

Inadequate Analysis - Deer Populations have and will Continue to Decline

Deer populations have been declining and will continue to decline due to loss of habitat from cumulative impacts of deforestation and climate change. The DEIS analysis does not adequately capture the effect of changing the Roadless Rule on the existing and future declines and fails to capture the required minimum deer population capabilities of existing ecosystems.

Inadequate Analysis – Road Construction Impacts

The DEIS does not adequately address the impacts of road construction on issues associated with erosion and sedimentation. Sediment loading to streams, and subsequent clogging of poorly built and maintained culverts, has negative impacts on salmon populations at all lifecycle stages. Similarly, the impact of roads

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

on increased imperviousness impacts local hydrology which is damaging to ecologically important muskeg (bog/swamp areas).

Inadequate Analysis – Logging Industry Impacts

Logging industry impacts not properly covered in the DEIS can include impacts associated with poor culvert construction and maintenance, poor trash management left behind by workers, loggers, and builders, excess forest debris, and clear-cuts being left impassable for 30-50 years. Similarly, the impact of logging practices on local hydrology is damaging ecologically and changes local flow patterns related to streamflow, snowmelt, and wetlands.

Inadequate Analysis – Irreversible Damage

Clear-cutting causes a decrease in soil health which leads to more sensitive landscapes down the line and less productive soils when ecosystems are trying to recover. The island of Chicagof and the eastern side of the state should be used as an example of seeing how old-growth forests do not ever grow back in the same way, particularly due to the impacts of a changing climate on how these ecosystems and vegetation are able to respond. The DEIS does not adequately consider these long-term effects of changing the Roadless Rule.

Inadequate Analysis – Human Health Tied to Ecological Health

Those reliant on the subsistence lifestyle are particularly sensitive to change in ecological health as it impacts their own human health in a myriad of ways. These impacts of the rule change are not adequately addressed in the DEIS.

Inadequate Analysis - Decreased Biodiversity

The DEIS does not adequately address the causes and impact of decreased biodiversity associated with the clear-cutting and timber industry activities that changing the Roadless Rule would allow. The commenters urge that the DEIS analysis should not “look at the forest for the trees” but take a wholistic view of the ecosystem and understanding the full cycle of ecosystem wellbeing and biodiversity as an invaluable resource.

Inadequate Analysis: Not Enough Forward-Looking Analysis Related to Growth

The DEIS does not adequately address how future needs will change regionally due to changes in population growth and distribution.

Cumulative Effects: Ideal Habitat Lands and Ideal Forestry Lands Conflict

The specific wooded areas which represent prime timber-harvesting land are also the same areas which represent prime habitats for deer, bear, wolves, and salmon. This conflict means that changing the Roadless Rule will directly impact the most crucial habitats for many species and the cumulative effects will be dramatic on both ecosystems and communities which rely on those ecosystems and species.

Cumulative Effects: Insufficient Cumulative Impacts Analysis

While the individual impacts of increased road construction, logging, and mining are generally covered in the DEIS, there is a lack of analysis associated with the comprehensive cumulative impacts that will occur in both the near and far term in the face of a changing climate. For example, deforestation leads to increased heat energy to the land surface due to lack of canopy which impacts both water temperatures and snowmelt, both of which will be amplified due to climate change.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Environmental Justice

Environmental Protections

In other parts of the world, people die for environmental preservation, so this topic is clearly extremely important globally and should not be ignored.

Management

Fiduciary Responsibility

The United States has specific and enforceable fiduciary responsibilities to protect and refrain from impairing tribal dependent resources. The Forest Service should keep the Roadless Rule intact to ensure the protection and preservation of these and other reserved rights, resources and habitats, and to safeguard the health, livelihood and well-being of tribal citizens of Alaska. Note that because the State of Alaska does not recognize subsistence rights, the federal priority to protect resources for subsistence users is even more crucial as a last line of defense.

Change to Negate Roadless Rule Altogether

The 2001 Roadless Rule states that USDA is responsible for sustaining health, diversity, and productivity of forests to meet the needs of present and future generations. How would this change meet that mission?

Prioritization of the Timber Industry

Commenters are concerned that the timber industry's perspective is being prioritized over any local concerns. Timber representatives were paid \$2000 to give presentations at local hearings but no tribal or local community representatives were paid or given the same level of acknowledgement or respect for their expertise.

National Forests are Intended for Multi-Use

The Tongass is a National Forest which means it is intended for multi-use. Some land should be allowed for natural resource extraction, so there should be a balance.

1997 Conservation Strategy for Wildlife Committee

This strategy found that even the designated conservation areas in 1997 were insufficient to maintain viable and well-distributed wildlife populations across the region. The Roadless Rule was enacted in part to improve wildlife conditions, therefore a change to the Roadless Rule would negatively impact the strides made in conservation regionally.

Crisis of Confidence due to Past Failures

There has been a "crisis of confidence" in the ability of outside organizations and regulatory commissions to adequately manage the historically native lands of southeastern Alaska. Using the specific example of Prince of Wales Island: local populations were against changes to logging plans in that area with over 90% supporting "no action," however that did not make a difference and action was taken. The impacts of increased logging on Prince of Wales have been described as habitat destruction, and a patchwork of roads and clear-cuts with wide-reaching negative impacts.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Conflict with Constitutional Mandate

Commenter believes Alaska's constitution mandates that preserving resources for subsistence use be prioritized over any commercial uses. Changing the Roadless Rule is therefore unconstitutional because it only benefits large-scale commercial logging while negatively impacting subsistence resources.

Resolutions

The City of Pelican Resolution 2019-07

This comprehensive resolution written by the community of Pelican was presented in full at the Pelican community hearing on subsistence. This resolution identifies the community's unique resources and responsibilities for conservation and sustainability, as well as its commitment to support the livelihoods of its residents through subsistence, fishing, and tourism. The change to the Roadless Rule would be in direct conflict with the community of Pelican to uphold its resolution to provide appropriately for its citizens.

Resolution 19-157: 2019 First Alaskans Institute Elders and Youth Conference

This resolution was passed at the Assembly of First Nations in 2019 to protect water and water-dependent species. This change to the Roadless Rule would be counter-productive to this local resolution.

Subsistence Concerns

Conflict with ANILCA Section 810

Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) requires Federal agencies having jurisdiction over lands in Alaska to evaluate the potential impacts of proposed actions on subsistence uses and needs. This change does not adequately account for the impacts on native peoples.

Competition for Resources will get Worse

Existing roads already bring in competition for declining subsistence resources. Roadless areas have become more essential and crucial over time for subsistence people to live as it is. Increased roads and loss of habitat due to changes in the rule will mean that more subsistence users will be forced to use smaller and smaller areas of land which will make living the way of life even harder.

Competition with Loggers

Although they are not technically allowed, loggers bring their rifles with them and remove a lot of deer from areas that are supposed to be protected for subsistence use. Changing the rule to increase areas open for logging will increase competition with loggers for subsistence resources that are already dwindling.

Abundance: Declining Deer Populations, Logging

The abundance of deer is already an issue regionally due to loss of habitat from historical poor land management and logging activities of the past. Removing Roadless Rule protections will only exacerbate these issues.

Abundance: Declining Deer Populations, Over-Hunting

The current problems locals see with low deer populations are due to over-hunting, not due to climate change or impacts from timber industries. Similarly, hunting in clear-cuts is easier than hunting in old-growth forests. Changing the Roadless Rule will have a limited effect on deer hunting.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Abundance: Declining Fish Populations, Logging

Fish populations and stocks are already declining due to existing regional logging and mining activities, which would be exacerbated by a change in the Roadless Rule. For example, deforestation results in decreased stream shading and increased water temperatures. A specific example of already declining fish populations are the Dog salmon.

Abundance: Declining Fish Populations, Climate Change

Declining fish stocks are related to the impacts of climate change in multiple ways. For example, ocean acidification from climate change impacts water pH, and climate change warms both fresh and marine waters. Removing Roadless Rule protections will only compound impacts of climate change on fish populations.

Responsibility for Restoring Fish Populations

If fish populations completely disappear due to change in Roadless Rule, will timber companies be responsible for replenishing fish stocks? Or will that be responsibility of local community?

Inadequate Stream Buffers

Because this region is prone to windthrow, buffer zones need to be half a mile wide to adequately protect streams from the heat exposure and sedimentation that is detrimental to fish populations. Current policies only require a 100-foot stream buffer, which logging companies often ignore and harvest timber to the water's edge. Changing the roadless rule will expose more miles of important fish habitat to these destructive practices.

Lack of Accounting

There is not an appropriate sense that any entity is tabulating the existing abundance conditions of local flora and fauna that would represent the current status of populations. For example, the amount of old-growth red cedars existing in the Tongass currently, counts of pinto abalone, herring, deer populations, etc. How can the impacts of historical logging or future impacts of the changed rule be tabulated properly without baseline estimates?

Dangerous Nature of Modified Access

Commenters state that the proposed change to the Roadless Rule will directly impact both where and when subsistence communities may be able to hunt and search for food. As changes impact locations of subsistence access, these areas may be further and further from home which is a huge burden on these communities. Having to fish or hunt off-island or further from home presents a physical danger to subsistence communities. As changes impact timing of subsistence access, locals must go out during more dangerous times of year related to weather, ice, snow, and predators.

Deer Avoid Clear-Cuts

Deer cannot be found in clear-cuts therefore hunters lose access to deer populations when they move out of the area to avoid clear-cuts from logging activities.

Local Logging Access Already Limited

Existing logging areas available to local communities have already been whittled down due to prior logging activities by multiple entities. Corporate logging is profit-driven, however local logging is for subsistence needs such as firewood, canoe, home, and longhouse construction, etc. Changing the Roadless Rule will further decrease access to logging areas for locals.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Moose Populations have and will Continue to Improve

A non-subsistence community member stated that moose have come into the region in response to clearcutting after logging was introduced regionally. Clear-cuts are prime habitat for moose and could provide ample food for those losing deer. However, note that no subsistence community members made mention of moose being part of their traditional diet.

Access

Change Would Improve Ferry Access

There is currently highly limited access for transportation in these communities because a ferry was taken offline in the past. If removing Roadless Rule protections brought the timber industry back to the area, the ferry service would likely come back online and improve general access for the communities.

The Roadless Rule has not Negatively Impacted Regional Access

Commenters state that the Roadless Rule has not had a negative impact on regional connectivity and access. The Roadless Rule has allowed for land protections while also allowing the authority of the Forest Service to approve vital road projects. The Forest Services has approved all 58 project requests it received for roads in Alaska since the Roadless Rule was passed, therefor any argument that existing issues with access or connectivity are a problem because of the act are untrue and there is no inhibition associated with normal infrastructure needs and projects.

Would Locals have Access to New Roads?

In the past, most roads built for logging gave only temporary and limited public access or provided no public access at all. Some commenters wonder if new roads after the rule changes will be private and exclusively owned and operated by timber industries or if locals will have access for their own use. This question applies to both during timber extraction processes and what will occur after those processes have come to an end.

Need More Roads

Removing Roadless Rule protections would allow more roads to be built which would decrease traffic congestion and allow locals better access to hunting grounds.

Focus on Maintaining Existing Roads

Instead of changing rules to allow new roads to be built, USFS should focus resources on maintaining existing roads that are inaccessible to locals due to vegetation and standing water.

Timber Industry

Subsidization

Regionally, timber industries have been heavily subsidized in the past which reveals the lack of economic sustainability associated with this practice. Changing the Roadless Rule to support timber would result in a net loss for local taxpayers.

Local Jobs Impact Negligible

The fiscal reality of the timber industry to Southeast Alaska is in the supply of less than 400 jobs locally (far lower than the available jobs through ecotourism and commercial fishing industries which employ some 10,000 people regionally). Overall, changing the rule creates negative impact on local economy.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Historical Losses

Both the Kupreanof and North Kuiu are examples of recent timber sales which failed to sell. The timber industry in this region is in the red, and with taxpayers funding road construction, there are no net gains to be made by removing Roadless Rule protections. Other commenters make mention of there being 3 timber sales recently which received zero bids when placed on the market.

Not Sustainable Economically

Commenters believe that any large-scale timber industry locally would be unsustainable, even if properly managed. The industry fails to modernize and innovate, and most areas in the Tongass are not profitable for logging. Timber represents less than 1% of the regional economy of Southeast Alaska, and an October 2019 report called “Cutting Our Losses” showed that the Federal Government loses money for every dollar spent supporting timber. Changing the Roadless Rule to allow access to the Tongass would not improve outcomes, as timber is a dying industry.

Best Practices are Not Followed

Historically, land management best practices for logging have not been followed regionally. Examples include: forested corridors for wildlife between clear-cuts have not been left, huge amounts of debris are left behind clear-cuts, blown out buffer strips, unregulated and unchecked logging, proposed restoration like thinning fail to protect resources on a meaningful scale, thefts, lack of erosion control, improper usage of water bars, cuts not according to contract, broken pipes, perched culverts, blocked culverts, logging truck oil drained in roadways, lube oil changed in roadways, fuel filters thrown out into roadways, etc. Expanding areas available for logging will only spread the implementation of these harmful practices.

Overseas Exportation of Timber (no gains locally)

Timber harvest activities in the Tongass involve shipping timber “in the round” (without any local wood processing which would potentially provide additional jobs) to export markets like China. The DEIS does not consider how this practice drains socioeconomic resources from the local area and subsistence communities. Additionally, the impact of the carbon footprint on shipping timber overseas should be properly accounted for as an additional impact on climate change.

Impacts of Deforestation on Communities

Deforestation is considered one of the four common factors associated with the decline and fall of civilizations. The change to the Roadless Rule would have a direct impact on the fall of local subsistence communities and culture.

Focus on Small-Scale Forestry

Small-scale logging practices would be more beneficial to local economy. Switching focus to special and value-added forest products would allow the forest to be more self-sustaining and would not require any new roads. Therefore, exempting the Tongass from the Roadless Rule is not necessary to revitalize a sustainable local timber-based economy.

Alternatives

Statement of Support for Alternative 1

Commenters state explicit interest in the support of alternative 1. This is the overwhelming response from nearly if not all community members who live on a subsistence way of life.

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

Statement of Support for Alternative 2

Commenters state explicit interest in the support of alternative 2.

Statement of Support for Alternative 3

Commenters state explicit interest in the support of Alternative 3.

Statement against Alternative 3

Commenters state explicit reason for not supporting Alternative 3.

Statement of Support for Alternative 6

Commenters state explicit interest in the support alternative 6. Grounds for support range from belief that climate change and carbon sequestration impacts are not real, to the belief that best management practices related to logging will be followed at this time in a way that they were not followed in the past.

Statement Against Alternative 6

Commenters state explicit reason for not supporting alternative 6. Reasoning includes the following examples: 1) only 35% of fish producing areas would be protected in the end which is not enough to maintain sustainable fish habitats;

Modification to Alternatives

Compromise

Commenters believe that alternative 1 is too restrictive, and alternative 6 is too far, so they prefer that a balance be struck between the two, although not necessarily or expressly one of the other alternatives provided.

Statement that Current Protections do not go far enough

Commenters believe that the existing Roadless Rule could offer more protections (for example, minimizing additional clearcutting). Additionally, perhaps additional lands can be set aside for specific cultural significance (e.g. old-growth trees like red cedar required for canoes, etc.)

1. Watershed Restoration Ongoing

The Roadless Rule provides the geographic and temporal space needed for the Tongass to recover from historical logging practices and mismanagement which created ample opportunities for restoration projects already. The land needs time to rest and for the waters to be restored to health, which would be jeopardized by opening the Tongass up to additional road and timber activities.

2. Change is Short-Sighted

Decision making of this magnitude geographically and based on scale of impact should be made looking at impacts on a much longer time-scale. The effects analysis is too short-sighted.

Socioeconomic

The Term “Subsistence” is Derogatory

What the local people refer to as their “way of life” is called “subsistence” by outside communities. Commenters find that the term is derogatory and implies that they lack the creativity to do something else with their resources. The proposed rule change demonstrates a lack of understanding about the way of life

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

in its historical and cultural context. Living off the land is not only essential and economical, it is fulfilling and exhausting.

Change in Rule is Direct Attack on Subsistence

The proposed change in the Roadless Rule is seen as a direct threat and attack on the subsistence way of life due to the extreme cumulative impacts the change would have on local communities, culture, native landscapes, self-reliance, food security, shelter, fuel, handicrafts, native medicines, emotional and psychological health, spiritual wellbeing, and future generations. Removing the Tongass from the Roadless Rule would produce both existential, profound, and generational impacts on local native populations.

Customary Trade

The subsistence economy is not just about food, but also includes customary trade. Residents are entitled to this local economic tradition and changing the Roadless Rule will negatively impact resources involved in the practice.

Island Community Concerns

There are a suite of concerns that are specific to and magnified by the fact that the majority of these communities are located on islands. The role of subsistence and potential lack of access or abundance is extreme for local island community members. Subsistence is considered the only viable option for many people, therefore socio-economics are highly tied to local healthy ecosystems, and the potential impacts of the rule change are amplified due to a basic lack of connectivity.

Roadless Rule is Good for the Economy

Commercial fishing and ecotourism are the key drivers of the local economy. Fishing and tourism together bring in over \$2 billion to Alaska annually. The Tongass produces 25% of the west coast commercial salmon catch. The Roadless Rule protects the environmental quality on which these industries rely.

Ecotourism is Bad

Keeping Roadless Rule protections for the Tongass is considered important for the ecotourism industry, which is touted by many to be crucial to the local economy; however, it is not carbon-neutral itself as tourists and cruise ships are brought in from faraway places.

Ecotourism is Vital

Maintaining the Tongass' roadless designation is considered important for the ecotourism industry, which plays a huge role in the local economy and continues to grow. Tourists come to spend their money locally for pristine wilderness, not to see stumps, clear-cuts, and mining waste.

Support Local Economy

Commenters would like for the Forest Service to support rural economic development through supporting local fishing and tourism industries, investing in recreational infrastructure, and streamlining permitting processes for community projects.

Roadless Rule is Bad for Economy

The local economy needs logging and fishing industries to grow. This change would have a positive impact on growing those industries which would improve local economies. Even a small number of new

Draft Concern Statements for Subsistence Hearings on Proposed Changes to the Roadless Rule

jobs would have a large impact on these small, isolated communities. Similarly, taxes from the timber industry can help local schools improve, and local wood manufacturing jobs could be created for products potentially.

Value of Pristine Wilderness

The Tongass is the largest in-tact temperate rainforest on Earth. So much of its uniqueness and resource value cannot be quantified or monetized as it truly is priceless. The rule change does not appear to adequately capture or understand this significance.

Regional Changes Felt Everywhere

Commenters state that there is a sense that this kind of rule change will have ripple effects across all communities regionally no matter the specific geographic extent of the changes. For example, if logging is introduced in one area, subsistence peoples will be forced out and into another area putting stress on that access and availability in a different area.

Arguments of Locals are Hypocritical

Some commenters argue that those opposing the change to the Roadless Rule are hypocritical because those locals also use roads and also use wood products which is hypocritical to oppose both logging and road practices.

Ecosystems

Old-Growth Forest Importance

The change does not appear to take into consideration the fact that many species are not just dependent on forest habitats but are specifically dependent on old-growth forest ecosystems which are the target of logging activities and provide the greatest potential economic opportunity for timber industries.

Geographic Importance Varies through the Tongass

Each geographic area of the Tongass is important for different reasons. Some regions are more specifically known for ecologically rich muskeg (bog/swamp areas), some are more known for old-growth forests with the proper tree species and ages for canoe making and longhouse construction, while other regions are better for certain fish, for deer populations, for seagull eggs, etc. The ecological implications of losing any particular part of the Tongass due to increased logging will have impacts on the entire ecosystem and food web.