Because of delays and missed deadlines for completed concern statement outputs from the content analysis contractor, the Forest Service and Cooperating Agencies (at the January meeting in Juneau) performed a review using preliminary concern statements. This emphasized that additional work was needed to refine and develop concern statements and that doing so through the contractor would not be effective/meet the timeline. Team members met in Bothell to further review comments and develop concerns. All letters were uploaded into CARA (and available to the team) at that time. However not all coding data was entered into CARA. The content analysis contractor was advised to turn their effort from development of further concern statements and to focus on getting the coding data uploaded into the CARA system.

A quality control exercise took place, involving review of a subset of letters (about 150) to ensure the full spectrum concerns were captured and considered.

Concurrently, it became clear that the CARA system was unable to handle the workload (number of workers, volume of letters) and the input and reporting system were experiencing frequent daily failures; compounding the problem. System glitches were also being discovered (including missing text from parts of the CARA system). On the advice of the developer and contractor liaison Judy Suing, the team opted to abandon the CARA system for this project, accepting a spreadsheet of all data as the final output for that endeavor.

The team developed draft concern statements based on the full suite of letters. Those concerns were further refined by team members throughout the process. Because of the system failures and inadequate quality found in concern statements produced by the contractor, there is not a clear one to one match between the contractor's concern statements (ContactorCARAConcerns Tab) and the final concern statements (AppendixH Tab). This document serves as an attempt to provide a crosswalk between these efforts.

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
1	There was concern that the consultation with Alaska Native tribes and corporations on the Alaska Roadless Rule was inadequate, and that this may lead to impaired agency performance of its responsibility to consult and coordinate with Tribes regarding any future plan or project for the Tongass.		138, 148, 140, 142
2	There was concern that government-to-government consultation was inadequate because tribal governments were not consulted prior to the Secretary of Agriculture acceptance of the State of Alaska's petition for rulemaking. Commenters said tribal concerns had been inadequately addressed and requests for government-to-government consultation were not responded to in a timely manner.		138, 148
3	Commenters said the DEIS should have included an alternative providing Tribal Nations with a more meaningful role in management decisions affecting land in the Tongass National Forest within their traditional territory.		118
4	Commenters were concerned that Alternative 6 was identified as the preferred alternative after all six tribal cooperating agencies indicated opposition for a full exemption from the 2001 Roadless Rule. Further, there was concern about the Forest Service relationship with cooperating agencies because suggestions for how to improve the analysis did not seem to be taken into consideration and community use area maps were not adjusted.		142, 148,
5	Commenters expressed concern that the process had not respected the sovereignty of tribal governments and its citizens and that tribal governments were not included as full cooperating agency partners in the decision-making process but rather were brought in after decisions were already made.		138
6	Commenters were concerned that exemption from the rule may impair tribal dependent resources and sought to have the rule kept intact for the protection and preservation of these and other reserved rights and to safeguard the health, livelihood and well-being of tribal citizens.		154, 155,
7	There was concern that exempting the Tongass National Forest may be a human rights issue and racially motivated. Commenters saw exemption from the rule as a violation of		38, 154,
8	The State of Alaska and others requested edits (additions/deletions) be incorporated into the FEIS.		293
9	Commenters disagree with the Forest Service's conclusion in the DEIS that "[a]n ANILCA Section 810 evaluation and determination is not required for the Alaska Roadless Rule because it is a programmatic level decision and not a determination whether to "withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of National Forest System lands." Commenters said this conclusion is inconsistent with the other facts reported in the DEIS. Others said that because the finding was not made in the DEIS, the subsequent notice and hearings were out of order and therefore prevents the USDA from making a legal Section 810 determination for subsistence. Commenters said the Forest Service violated the Alaska National Interest Lands Conservation Act (ANILCA), National Forest Management Act (NFMA), and National Environmental Policy Act (NEPA) by failing to make a subsistence finding and analyze factors necessary to make the finding.		101, 103, 132,
10	Title VIII, Section 810 of ANILCA requires federal agencies having jurisdiction over lands in Alaska to evaluate the potential impacts of proposed actions on subsistence uses and needs. Commenters were concerned that the analysis of the proposed change does not adequately account for the impacts on Native peoples.		101, 132, 6 (S)
11	The Forest Service's failure to provide site-specific subsistence information and consider the Organized Village of Kake's use map in February 2019 violates ANILCA and NEPA.		103, 132,

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
12	The Forest Service violated ANILCA and NEPA by refusing to consider mitigation measures proposed by Kake to protect all remaining, intact old-growth habitat in Kake's traditional use area, updating the Tongass roadless inventory to capture all roadless lands important to Kake, and allowing an improved role in management of lands in Kake's traditional territory.		103, 163
13	The Langdon and Sanderson (2009) publication should be used as a resource to define the K'iis Xaadas territory discussed in Appendices E and F of the Alaska Roadless Rule DEIS, and Table E-12 of the DEIS should reflect the corrected traditional territory. This area may be smaller than the "Community Use Area" currently defined in the DEIS, however the K'iis Xaadas traditional territory is more widely recognized and is still the currently recognized traditional use area for Hydaburg.		123, 148
14	There was concern that the traditional knowledge was not incorporated into the DEIS. The subsistence economy for residents of Southeast Alaska is strong, and the reliance upon fishing, hunting and gathering takes an understanding of the available habitat and environment.		124, 132,
15	Commenters expressed concern that a rule change would 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 users will be displaced to other areas potentially increasing competition for resources in those areas.		20 (S)
16	Commenters sought tabulations of 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. Commenters questioned how the impacts of historical logging or future impacts of the changed rule could be tabulated properly without baseline estimates. Commenters sought effect analysis for specific impacts 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.		73 (S), 24 (S), 132
17	Comments sought additional analysis about how future needs will change regionally due to changes in population growth and distribution.		46 (S)
18	Commenters consider the proposed change in the Roadless Rule 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. Commenters said that removing the Tongass from the Roadless Rule would produce both existential, profound, and generational impacts on local native populations.		3 (S)
19	Commenters said that 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 would negatively impact resources involved in the practice.		40 (S)
20	Commenters explained that 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 socioeconomic conditions are highly tied to local healthy ecosystems, and the potential impacts of the rule change are amplified due to a basic lack of connectivity.		17 (S)
21	Commenters found the term "subsistence" derogatory and that it implies a lack of creativity in utilization of resources. Local people refer to it as their "way of life". The proposed rule change demonstrates a lack of understanding about the way of life in its historical and cultural context. Living off the land is not only essential and economical, it is fulfilling and exhausting.		56 (S)

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
22	Commenters sought effects analysis considering how 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.		21 (S), 4, 144, 303
23	Commenters sought further effects analysis of the cumulative socioeconomic impact of the loss of deer, fish, and other resources to subsistence communities over time.		64 (S), 137
24	Commenters stated that the United States has specific and enforceable fiduciary responsibilities to protect and refrain from impairing tribal dependent resources. These commenters believe that 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. Commenters said 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.		75 (S), 154, 155
25	Commenters said that Alaska's constitution mandates that preserving resources for subsistence use be prioritized over any commercial uses and that changing the Roadless Rule would therefore be unconstitutional because it only benefits large-scale commercial logging while negatively impacting subsistence resources.		37 (S), 277
26	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. There was concern that increased roads and loss of habitat due to changes in the rule would 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. Commenters were concerned that changing the rule to increase areas open for logging would increase competition with loggers for subsistence resources that are already dwindling. Commenters were concerned that changing the Roadless Rule would further decrease access to logging areas for locals. 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.		29 (S), 60 (S), 20, 132,
27	Commenters expressed concern that the DEIS does not consider how exporting logs drains socioeconomic resources from the local area and subsistence communities.		72 (S), 28
28	Commenters were concerned that 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.		36 (S), 152, 165, 306, 307,
29	Commenters said that 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. Commenters were concerned with low deer populations due to over-hunting, rather than climate change or impacts from timber industries. Commenters said that hunting in clear-cuts is easier than hunting in old-growth forests and that changing the Roadless Rule will have a limited effect on deer hunting.		31 (S), 85 (S), 152, 165, 306, 307,

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
30	Commenters sought effects analysis disclosing how the proposed rule change would directly and indirectly impact subsistence users and harvesters in the Tongass National Forest. Effects analysis should consider changes in subsistence distribution resulting from climate change.		132, 163
31	Commenters expressed concern with the adequacy of the analysis of effects of roadbuilding on subsistence resources. Commenters also requested the use of more current data rather than relying on the data used in the 2016 Forest Plan Amendment EIS.		29 (S), 132
32	There was concern that the Citizen Advisory Committee (CAC) membership was not representative of all stakeholders and that the CAC lacked procedural safeguards, an understanding of the 2001 Roadless Rule, sufficient to make informed recommendations.		156
33	Commenters were concerned that CAC recommendations did not appear to be considered and/or reflected in the DEIS and that the action alternatives lacked language proposed by CAC including the new road and timber cutting exceptions.		161, 158, 168
34	Commenters expressed concern that granting funds to the State of Alaska to support the State's involvement in the Alaska Roadless Rulemaking process violated the Federal Advisory Committee Act, was a misuse of congressional appropriations, and created a conflict of interest.	97	138
35	Commenters express concern about the Forest Service's ability to manage forests, as they do not have the staff nor the budget to adequately enforce management of the forest. Commenters provided examples of land management best practices for logging not being followed regionally and concern that expanding areas available for logging would only spread the implementation of harmful practices.		72, 330
36	Management Plan (Forest Plan), and that moving forward with the proposed rule would		300
37	Commenters expressed concern about changes to the Forest Plan, saying that any substantial changes to suitable timber designations were not significantly raised during scoping and any substantial changes to suitable timber designations following the exemption of the Tongass National Forest from the Roadless Rule would require following the rulemaking guidance for Special Areas, Forest Plan Amendment Revisions, and the Administrative Procedures Act before the Forest Service could authorize any road construction, reconstruction, or timber harvest in those areas. The 2016 Forest Plan does not address the impacts that changing timber suitability designations would have on roadless areas, which is required. The proposed changes would modify the Forest Plan as amended, including determinations that the Forest Plan is in alignment with Tongass Conservation Strategy and Recreation Opportunity Spectrum guidance.		102, 110, 220, 295, 291, 304
38	Commenters were concerned that if a Roadless Rule exemption occurs, the Forest Service will then revise or amend the 2016 Forest Plan. They believe a forest plan revision or amendment is reasonably foreseeable since the State of Alaska's petition specifically requested changes to the Tongass Forest Plan and the commenter(s) believe that rebuilding the timber industry in Southeast Alaska is the purpose of the Alaska Roadless Rule.		140
39	The Forest Service cannot administratively change the designation of lands suitable for logging because only a forest plan revision or amendment can be used to change a "plan component."		350, 297
40	Commenters supported changes to the Forest Plan for increased timber harvest, including old growth. Some suggested the Forest Plan be revised to eliminate the transition to a predominantly young-growth timber program.		296

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41	There was concern that adjustments to timber suitability or old growth harvest acres by the proposed rule and alternatives would require amending or revising the Forest Plan to modify desired conditions and land suitability decisions to include IRAs. Commenters said there is no demonstrated urgent need for changing the Roadless Rule and that any Forest Plan revision should occur as a parallel process with the Roadless Rule change. Further, there was concern that the Timber Priority Area management category, as presented in Alternative 4, is not a narrowly focused exception to roadless area desired conditions.		48, 102, 110, 220,
42	Commenters were concerned that the use of the administrative change procedure to		102, 110,
43	Commenters were concerned that an exemption would undermine the collaborative work that went in to developing the Forest Plan. In the development of the Forest Plan, the collaborative group recommended phasing out large-scale old-growth logging over a 16-year period, easing standards and guidelines to allow increased access to young-growth timber as a way of encouraging the transition away from old-growth logging, and protecting important areas from future logging, including roadless areas, the Tongass 77 (T77) watersheds, and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas. The expectation of the Forest Plan collaborative group was that its recommendations be taken as a whole and not adopted partially or in a piecemeal manner.		75, 301
44	Commenters request that the forest be managed by the Forest Service to meet the agency mission and for multiple use and the health of the forest.		329
45	Commenters said that control/management of the Tongass National Forest should be given back to the State of Alaska.		327
46	Commenters were concerned that activities in old-growth stands would lead to a loss of opportunity to inventory, study and to further understand the aerosols, pheromones, and chemicals that occur with the oldest and largest trees of each species and subspecies of tree.		338
47	Commenters referred to how clearcut 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.		80
48	The Forest Service's proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests.		129
49	Commenters asked whether the Chicken Creek area on the north end of Chichagof Island which is presently managed under the Old-Growth Habitat LUD would remain protected under the full exemption alternative (Alternative 6).		43 (S)
50	Commenters sought a Forest Plan amendment to include updates to the suitable lands designation and timber transition strategies in consideration of the economic viability of the timber industry.		296
51	Commenters are concerned that the project will reduce scenery standards and values on NFS and adjacent lands by allowing additional clearcutting, namely through Forest Plan Amendment.		64, 185, 287, 347
52	Commenters were concerned that projecting over 25 years is not appropriate because Forest Plans should be revised every 10-15 years.		377
53	Commenters stated that the Change to Timber Land Suitability acres should be updated to remove the Alaska Roadless Areas and LUD II Priority lands and reflect that timber production will not occur in these areas. Designated Alaska Roadless Areas and LUD II Priority lands are not suitable for timber production, since timber production and road construction are inconsistent with Roadless Area and LUD II desired conditions.		220

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
54	Commenters were concerned with the proposed provisions that allow changes to designations within the Chugach National Forest. Commenters felt the provisions were too broad and not specific enough and could lead to additional logging and associated impacts in the Chugach. Commenters sought clarity as to the definition and scope of modifications and classifications for Chugach NF proposal, and sought a more thorough discussion of the Chugach in the EIS. Some commenters were concerned that the administrative boundary provisions for the Chugach National Forest were not part of the State's petition and not responsive to the purpose and need, and thus felt it should be removed.		99, 104, 222, 111, 203, 224, 245, 247, 266, 267, 368, 370
55	Commenters suggest the Forest Service extend the exemption from the Roadless Rule to the Chugach National Forest to improve access for hydropower development.		298
56	The State of Alaska's petition does not reflect the national importance (described in the 2001 Roadless Rule) of the Tongass National Forest roadless areas and gives preference to the State of Alaska's desires for local timber production.		20, 378
57	Commenters asked how changes to the Roadless Rule would help the agency meet its responsibilities for sustaining health, diversity, and productivity of forests to meet the needs of present and future generations.		3 (S),
58	Commenters question the need for project because the 2001 Roadless Rule already provides flexibility and natural resource extraction through exemptions.		225, 265, 348
59	Commenters question the need for the exception that allows for timber harvest to improve, restore or maintain fish and wildlife habitat.		67
60	The purpose and need statement is vague and confusing and lacks meaningful criteria for formulation and comparison of alternatives.		53
61	The proposed rule gives preference to the State of Alaska's idea of local timber production desires and does not support the national need to protect roadless areas within the Tongass National Forest.		92 (S),
62	Commenters are concerned about the rationale used to support and demonstrate need.		110, 114, 184, 288, 342
63	Commenters stated that exempting 9.2 million acres of inventoried roadless acres (Alternative 6) would not resolve controversy with regards to managing roadless areas and does not adequately meet the purpose and need.		112
64	Commenters state that the Roadless Rule should reinforce the Tongass Advisory Committee (TAC) recommendations in the 2016 Forest Plan by protecting the Tongass 77 watersheds and TNC/Audubon Conservation Priority Areas. The TAC can serve as a roadmap for incorporating public interest and economic realities into an Alaska Roadless Rule.		274
65	Commenters were concerned with the adequacy of public involvement efforts, such as, length of the public comment period, requests for additional public meetings (including outside Alaska), opportunities for oral testimony at public meetings, and scoping being initiated late in the process. Commenters felt that decisions of this magnitude should be discussed and decided over a longer period of time. Some commenters believe USDA and the Forest Service are in violation of the 1st Amendment by not allowing oral testimony. Another commenter felt that public hearings should allow for anonymous statements from community members who are not comfortable stating their names for the record. Commenters requested community education workshops on the 2001 Roadless Rule.		52, 108, 109, 366
66	There was concern that the rulemaking processes contributed to a practice of discrimination by minimizing or eliminating the voices of marginalized and low-income communities.		39

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67	Commenters expressed concern that Native Tribes, organizations, and people are not properly supported, represented, heard, or understood when it comes to these kinds of regulatory changes and that involvement processes are not effective.		81 (S),
68	Commenters expressed concern that the agency does not heed the will of the public majority when it comes to action on public lands and that results in consequences, such as increased logging with effects like habitat destruction, patchworks of roads, clear cuts and wide-reaching negative impacts.		155, 205
69	Commenters questioned how and whether public opinion would influence decision making. In addition, given challenges with attending hearings in-person (distance, access, obligations, scheduling), commenters suggested that public opinion counts should be weighted to reflect that those unable to attend likely agreed with the majority present.		81 (S),
70	Commenters sought public outreach about Alternative 6 to reduce opposition through education by clarifying that concern about environmental effects of large-scale clearcutting is based upon inaccurate information and not supported by USDA rules governing timber sales.		238
71	Resolutions were received from local governments in support and opposition of exempting Roadless Rule protections for the Tongass National Forest.		215, 221
72	Comments and resolutions were provided in support of the Southeast Alaska electrical intertie and transportation corridor projects to promote regional economic development.		223
73	Commenters sought disclosure of public opinion about the proposed exemption.		191, 205
74	Respondents said that the DEIS should have included an alternative that updates the roadless inventory to include all roadless areas that were not included as inventoried roadless areas under the 2001 Roadless Rule.		118, 122
75	Commenters suggested modification of some alternatives by including components of another alternative (mixing and matching). An example of this would be modifying Alternative 2 by adding the proposed regulatory prohibition of old-growth harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless areas (similar to the Forest Plan) that is part of Alternative 3.		146
76	Commenters expressed concern that the DEIS did not satisfy the requirements of NEPA. There was concern that DEIS does not present a range of reasonable alternatives and that the alternatives presented were contradictory with arbitrary differences in roadless acreage and logging.	50	103, 118
77	The Forest Service does not explain the differences between the administrative boundary correction and modification provisions proposed for Alaska and prior similar provisions.		224,
78	Commenters express concern regarding the existing regulatory language which was retained from the 2001 Roadless Rule.		158
79	Commenters expressed preference for Alternative 1 and then provided secondary preferences. Individuals listing Alternative 2 as a secondary preference did so because there would not be a significant net change in acres protected. Commenters expressed that each national forest belongs to all Americans and should be protected by the Roadless Rule.		13, 24, 25
80	Commenters requested that the Forest Service select an alternative that balances environmental protections with economic development.		40, 241, 310
81	Commenters expressed opposition to both Alternatives 4 and 5 as they would convert inventoried roadless areas into roadless priority areas, reducing protections for these designated areas.		210

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
82	Commenters supported providing regulatory protection of areas identified in the 2016 Forest Plan as T77 watersheds and TNC/Audubon Conservation Priority Areas (high-priority watershed areas) that are outside of designated roadless. Specifically, old-growth timber harvest would be prohibited, as is proposed as a component of Alternative 3.		84 (S),
83	Commenters request the Forest Service reinstate the Transportation Utility System Land Use Designation (TUS LUD) that had been removed in the 2016 Tongass Forest Plan. This would allow access for renewable energy projects that would have climate change benefits and benefit the local community.		228, 299
84	Commenters sought an alternative that broadly protects fish habitat, continues the phase-out of industrial scale old-growth clear-cutting, and prioritizes the restoration of degraded watersheds and streams.		269, 275, 277
85	Commenters sought protections in addition to what is offered by the existing rule. For example, minimizing additional clearcutting and adding lands set aside for specific cultural significance (e.g. old-growth trees like red cedar required for canoes, etc.).		22 (S),
86	Commenters express support for designating specific areas in the Tongass as managed tree farming zones.		244
87	Commenters express support for designating the Tongass as a national monument and others supported designation as a National Park to increase protections.		74, 242
88	Commenters expressed support for expanding the Roadless protections in the State of Alaska, so additional lands would be designated as off-limits to development. Commenters also specifically requested expanded protections for T77 Watersheds and TNC/Audubon Conservation Areas outside of current roadless areas.		190, 216, 243a
89	Commenters requested that projects already allowed to be permitted in roadless areas should be expressly provided for in any new Alaska Roadless Rule, including the powerline corridor to Takatz Lake, Blue Lake, or Glacier Lake licensing or relicensing or additional generational capacity, and corridors for road connections.		276, 331
90	Commenters request protection for specific watersheds or areas that have been identified as the most important to their community, notably but not limited to encompass culturally and traditionally important sockeye salmon systems. In many areas within these watersheds, the 2001 Roadless Rule are the only protections that apply. Further, the Watershed Priority management category applied to TNC/Audubon Conservation Priority Areas and Tongass 77 Watersheds does not add any additional protections for these areas as these watersheds were not included on the lists of those areas.		151, 226
91	Commenters sought preservation of key wetland areas in the Tongass, such as the T77 Watersheds and TNC/Audubon Conservation Priority Areas.		274, 374
92	Commenters provided input in both support and opposition of each Alternative.		12, 14, 16, 36, 75, 84, 86, 89, 112, 136, 189, 195, 202, 204, 206, 209, 212, 213, 214, 231 249, 251, 259, 267, 278, 309, 310, 311, 312, 318, 345
93	Commenters expressed opposition to changing the Roadless Rule protections for the Tongass and Chugach National Forests. Rationale for maintaining the current rule (Alternative 1) include preserving old-growth habitat and avoiding habitat fragmentation. Commenters expressed belief that reducing protections would result in an increase in timber harvest and road building that, in turn, would result in increased adverse impacts to multiple resources (e.g., habitat, watersheds, subsistence). Commenters were generally opposed to exemption because they believed it would result in harm to the environment and to tribal dependent resources. Many generally objected to resource extraction by private industry. Many supported Alternative 1 over exemption because it was more protective of natural resources and still provided economic development.		20, 25, 40, 88, 89, 115, 232, 235, 155, 189, 191, 195, 215, 267, 269, 270, 272, 309, 311, 312, 370

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
94	Unused		
95	Commenters expressed opposition to changes of the Roadless Rule protections for the Tongass and Chugach National Forests because they felt this process disregarded local input, collaboration, and the public interest. Commenters stated support for local decision-making for forest projects, activities, and rules.		20, 191, 334
96	Commenters expressed support for changes to the Roadless Rule, including the full exemption, because they believe the 2001 Roadless Rule (Alternative 1) is too restrictive. Commenters believe the Roadless Rule does not provide flexibility for timber and mining industries, forest treatment to prevent fires or manage for grazing, and impedes renewable energy and other development.		276, 345
97	Commenters expressed concern about the phrasing of the proposed action changing between publishing the Notice of Intent and the 2019 publication of the Notice of Availability of the DEIS for comment.		222
98	Commenters explained that adding the suitable timber lands proposed in the exemption would provide the necessary flexibility in selection to allow the Forest Service to offer economic timber sales that meet the needs of the timber industry and provides for other development on the Tongass that contributes to rural economies.		253, 345
99	Commenters expressed that the proposed rule will lead to the extraction of natural resources, which will bring jobs to the area, reduce demand for select imports, and stimulate the economy. Additional roads and rights of way for utilities are necessary for economic development, particularly for the 29 of 32 communities in the region that are not connected to the nation's highway system and are typically surrounded by marine waters and undeveloped Forest land. Exemption will support local communities that live, work, hunt, and fish in the Tongass.		41, 345
100	LUD II Priority and Roadless protections should overlap to ensure the greatest restriction on road construction. One of the strongest combinations of protecting National Forest System lands from degradation is overlapping special area designations. These overlapping designations provide a complimentary framework for a high-level of protection from overuse and development of federal lands.		196
101	The rationale for Alternative 6 as the proposed rule is not supported by the facts. The DEIS projects minimal beneficial effect on the forest product industry and thus does not support the assertion that eliminating the Roadless Rule will support rural economic development. The assertion that the Tongass should be managed locally ignores the Forest Service's 2001 conclusion that national rulemaking was needed to protect roadless areas. The DEIS recognizes that logging is most likely to be economically efficient in areas where there are already roads which is contrary to the assertion that opening roadless areas will result in more economic timber sales.		112, 113, 213, 214,
102	The NPRM provides no justification to support any additional exceptions. The 2001 Roadless Rule already provides for access to hydroelectric projects, construction of communication infrastructure, construction of transmission lines, access for locatable minerals, development of energy projects, and regional transportation projects. Although the 2001 Roadless Rule prohibits building roads for leasable minerals, the DEIS states there is no current or anticipated demand for leasable minerals on the Tongass.		348
103	Commenters perceived impropriety associated with how this proposed Alaska Roadless Rule came about between the Governor of the State of Alaska and the president. There was concern that the State's petition to initiate this rulemaking process was filed under false pretenses and did not involve any public scoping. Further, they are concerned that this change is motivated by politics and outdated timber-specific economics rather than being informed by the best available science.		50, 51, 86, 340

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
104	Commenters were concerned that there was inadequate reasoning given for the selection of the preferred alternative in the DEIS, and that it was politically influenced, arbitrary and capricious. There was concern that selection of Alternative 6 as the preferred polarized the discussion, making nuanced conversation difficult.		119, 161
105	The proposed rule is unlawful because it fails to provide a rational explanation for changing the Forest Service's roadless policy in the Tongass.		114
106	The effects disclosed in the DEIS are based on the premise that the proposed rule will fail because the proposal will not increase mining, development of leasable mineral, energy projects, infrastructure, timber output, and jobs.		62, 90, 129,
107	Commenters expressed that including the Timber Priority LUD within the ARR boundary is confusing and inappropriate. They felt that timber production is incompatible with protecting roadless area values.		207
108	Commenters sought a baseline that includes an accurate accounting of roadless areas that still have roadless characteristics, rather than inventoried roadless areas.		118, 122,
109	Commenters were concerned that prior to the October 2019 DEIS release, the Forest Service deleted all young growth age-class data from their public portal, making it impossible for the public to consider the high-production of young growth timber.		349
110	There was concern that the DEIS did not use the most current roadless inventory. This would include roadless areas in the Keex' Kwaan traditional area that were not included in the 1996 inventory used as the basis for the 2001 Roadless Rule, specifically critical lands in Three-mile Arm, Seclusion Harbor, and No Name, Alvin, and Reid Bays. Commenters urged the Forest Service to update the 2001 Roadless Rule to apply it to all Tongass Inventoried Roadless Areas, particularly those important to Keex' Kwaan.		122
111	Commenters believed that the DEIS unlawfully postpones analysis of key impacts.		61, 127, 132, 179, 219,
112	There was concern that deferring analyses of localized effects (community scale analyses) to subsequent site-specific proposals would place undue burden on local communities, particularly low income and marginalized communities that may lack resources necessary to conduct these analyses.		186
113	The DEIS does not recognize the environmental effects of potential road construction and reconstruction in non-development LUDs that may occur to access the development LUDs within roadless.		54,
114	Commenters expressed concern at the perception of a conflict between the Forest Service position that the proposed rule will not lead to more logging and the State of Alaska's petition, comments from Alaska's elected officials, and industry proponents demonstrating that the purpose of the proposed rule is to revitalize and expand the failing old-growth logging industry.		90, 112
115	Commenters sought analysis of direct and indirect effects to the qualities of the Biosphere Reserve, particularly Glacier Bay National Park and Preserve – Admiralty Island.		192
116	Commenters questioned the effects disclosed for inventoried roadless areas with Developmental Land Use Designations (Development LUDs), and sought clarification that the alternatives identify both prohibitions and permissions for land use such as timber production and road construction.		54
117	The impact analysis fails to accurately identify differences among the range of alternatives and minimizes the impact of even the most extractive alternative. Such an approach grossly misrepresents the impact of the preferred alternative and ignores a key requirement under the National Environmental Policy Act. The lack of impact analysis sets a dangerous precedent for future proposed rulemakings impacting our public lands, parks and forests.		219

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
118	Commenters were concerned that the impacts analysis for alternatives was flawed because the basis for estimating volume of forest harvested and the assumed definition of "detrimental impacts" illustrated a misunderstanding of the local resources and ecosystems. For example, a geographic information system 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.		39 (S),
119	Comments sought additional discussion in the DEIS of logging industry impacts which can include poor culvert construction and maintenance, poor trash management, excess forest debris, and clear-cuts being left impassable for 30-50 years.		33 (S),
120	The DEIS is insufficient and misleading because it underreports or fails to disclose the many, potentially significant, environmental impacts of removing the Roadless Rule protections from the Tongass. This misrepresentation makes it impossible for the public and decision-makers to assess the exemption's adverse effects on the economy and ecosystems.		66, 129, 217,
121	The Forest Service's proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests. The DEIS seems to disregard information in its impact analysis about impacts of clear-cutting old growth forests. This leads to DEIS conclusions that are in disagreement with the FEIS generated in 2000 when the Roadless Rule was created which clearly documented the negative cumulative impacts the Tongass would be subject to.		129
122	The Roadless Rule has been in effect on the Tongass for 20 years and removing it would cause adverse and irreparable harm.		20, 138
123	Commenters expressed concern with effects analysis, saying that the definition of "old growth" is oversimplified and that by discussing effects in terms of acres of old- or second growth lost does not account for total roadless acreage impacted.		112, 128, 130, 294,
124	Commenters sought effects analysis, with more detail about the location and consideration of long-term secondary impacts, of natural resource extraction, including clear-cutting or development activities. Commenters further sought analysis showing the amount of forest fragmentation expected; documenting the amount of contiguous productive old-growth and contiguous large tree old-growth currently remaining; and disclosing effects on maintaining viable, well distributed populations of yellow cedar. Commenters sought studies to determine harvest data, especially old-growth harvest data, for yellow cedar, detailed mapping of climate envelope maps for yellow cedar for the next 400 years, and analysis of range shifts.		129, 162, 180, 367
125	Commenters sought information about adaptive risk management, including monitoring and mitigation, for all action alternatives.		141
126	Commenters said that using the same LUD categories for the action alternatives that are found in the Forest Plan would allow for better integration of the rule direction and plan components.		350
127	Commenters expressed concern that greater human access through additional road construction would lead to increased potential for invasion by pests such as hemlock woolly adelgid, emerald ash borer, and Douglas-fir beetle and other exotic invasive species and pathogens.		181, 270, 271
128	The only portion of the DEIS that discloses impacts in development LUDs within roadless areas is the outfitter/guide uses section which demonstrates the Forest Service could have provided more detailed analysis for every other resource.		54, 297,

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
129	Commenters sought effects analysis disclosing how the proposed rule will directly and indirectly impact ecosystem services in the region including economic cost and benefits related to impacts on ecosystem services. There was concern that exemption from the rule could lead to removal of trees and damage to ecosystems which can negatively impact ecosystem services.		150, 217
130	Commenters expressed concern that exempting the Tongass from the Roadless Rule could lead to disturbance, development, or logging resulting in the damage or loss of ecosystem services in sensitive or pristine ecosystems including oxygen production, filtration of air, water and soil, as well as loss of fisheries and game populations.		80, 268, 318, 326
131	Commenters expressed concern about the cost-benefit analysis using changes in suitable old-growth and young-growth acres as an indicator for potential displacement of recreationists interested in primitive recreation experiences. There was concern about the methodology used to measure adverse visitor impacts. Commenters also sought consideration of scenic values in the cost-benefit analysis. Commenters sought a full cost-benefit economic analysis that uses best available science to assess socioeconomic impacts of each alternative as well as analysis of the socioeconomic value and impact on fisheries, ecotourism, special use permits, recreation, game populations, and subsistence resources.		60(part2), 61, 135, 93, 98, 132, 137, 149
132	The recreation-related assessment provided in the separate Regulatory Impact Assessment and Cost-Benefit Assessment prepared for the Project (USDA Forest Service 2020) understates potential impacts to the visitor industry because it considers only changes in suitable timber acres and does not address indirect effects to adjacent areas. Timber harvest and road building activities have the potential to affect much larger areas than the area that is logged. Concern was expressed that the Forest Service did not analyze the corresponding effects on rural communities from the displacement of outfitters, guides, and tour operators.		61, 372
133	Commenters seek to keep any profits from timber harvesting in the local economy.		83
134	There was concern that any economic benefit from exempting the Tongass National Forest from the Roadless Rule would not last long and would benefit only a small group of individuals and minority of industries while the long-term impacts would be substantial and negatively impact a larger group of individuals and a majority of industries.		96, 211
135	Commenters requested that any profits made from logging should be paid back to taxpayers to relieve the federal deficit.		341
136	Commenters were concerned with the adequacy of economic analysis and whether the analysis incorporated the best available science. Further, there was concern that issues about economic analysis were brought forward during scoping but not adequately addressed in the DEIS.		93, 98, 50, 105, 132,
137	Commenters asked that the EIS affected environment section include historical numbers (used in the Regulatory Impact Assessment) of timber harvest and road density during/through/after the temporary exemption period.		121
138	Commenters sought cost data for road building and maintenance (per mile) in the areas considered for exemption from the rule.		139
139	Commenters sought comparison of respective socioeconomic contributions of timber sale purchasers and the visitor industry. They requested that analysis of effect include more current information and changes in assumptions to better consider the regional scale of the visitor industry.		197

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
140	Commenters expressed concern that exempting the Tongass from the Roadless Rule would cause economic harm to Southeast Alaska residents by threatening tourism, commercial fishing, sport fishing, and subsistence economies. They requested that these impacts be accounted for in the rulemaking process and countered with mitigation efforts. Commenters also noted that economic concerns extend to Washington State where the commercial fishing and cruise industries are directly affected by what occurs in Alaska.		109, 278,
141	Commenters were concerned that the action alternatives would not have an economic impact in terms of regional jobs/employment and would only benefit timber sale purchasers.		230
142	Commenters were concerned that opening more areas to logging would lead to an increase in timber sales that are not economically viable. Commenters questioned the need for changing the Roadless Rule considering examples of recent timber offerings that failed to sell and others that sold at a loss. Commenters expressed concern that changes to the Roadless Rule to allow logging access would not improve outcomes for a dying timber industry. Commenters indicated that any large-scale timber industry locally would be unsustainable, even if properly managed. There was concern about the industry's failure to modernize and innovate and most areas in the Tongass not being profitable for logging. Commenters said that small-scale logging practices would be more beneficial to local economies, that 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.		256, 257, 258
143	Commenters expressed that fishing and tourism industries should be supported over logging because those industries are sustainable and more important to the area economy. Commenters note that the existing Roadless Rule protects the environmental quality on which these industries rely.		279, 280
144	Commenters said that tourism and outdoor recreation are major driving economic forces for the Alaskan economy and worth more than the timber industry (four times as many jobs in the state as oil & gas, mining & logging combined). Commenters are concerned that changes to the rule will impact recreation and tourism because currently, visitors travel to Alaska for pristine wilderness, clean air, water, wildlife habitat, scenic values and primitive and semi-primitive recreation opportunities. There is concern that these impacts will be experienced on 165,000 acres directly and thousands of acres indirectly plus more acres pending changes to the Forest Plan that would occur following a rule change.		278, 279, 281, 282, 284, 372
145	Commenters were concerned that jobs provided by the tourism industry are insufficient to support local communities and, therefore, not a reason to consider keeping the Roadless Rule in place.		283
146	Commenters said that the ecotourism industry is not carbon neutral and that should be considered when weighing it against activities that may occur following a change to the Roadless Rule.		89 (S),
147	The tourism industry is projected to increase to over 2.4 million visitors to the area. The Forest Service is not ready for this increase, and no plan is in place to prepare for this increase. Large group sites and trails are underdeveloped, and the Forest Service must focus on preparing for an increase in tourism, rather than support logging.		285
148	Commenters said that the local economy needs logging and fishing industries to grow and that a rule change would have a positive impact on growing those industries which would improve local economies. Even a small number of new 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.		14 (S),

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149	Commenters sought agency support for rural economic development through supporting local fishing and tourism industries, investing in recreational infrastructure, and streamlining permitting processes for community projects.		15 (S),
150	There was concern that timber in the Tongass is primarily exported overseas to European and Asian countries. This helps other countries' economies while negatively impacting the Alaskan economy.		28
151	The NPRM states the proposed rule is a deregulatory action and would create an incremental reduction in the cost of conducting compliance reviews, thus reducing expenditure of taxpayer dollars. Neither the DEIS nor the NPRM attempt to quantify this potential reduction and reviews for projects in roadless areas do not impose a significant burden, as demonstrated by the 50 projects approved in roadless areas on the Tongass. In addition, the incremental saving for reviewing projects would be far outweighed by the additional expense taxpayers would incur from expanding the Tongass timber project into roadless areas. Commenters expressed concern that the Forest Service had not adequately evaluated the costs of this proposed rule, stating that the proposed rule has a total cost greater than zero, making it a "new regulatory action," not a "deregulatory action" under Executive Order 13771.		99
152	Commenters disagreed with the cumulative effects discussion about timber program decline over the past century, saying instead, that the timber industry has been sustainably operating and that the average market prices of Tongass timber have been rising.		369
153	Commenters were concerned that the DEIS did not quantify the reduction in expenses from exempting the Tongass from the Roadless Rule.		125
154	Commenters sought analysis showing potential financial returns from future projects involving opening roadless areas and actual return from timber including a full inventory of economically viable old growth timber.		145
155	Commenters disagreed with the assertion that the proposed rule would not increase agency costs because it would not increase timber harvest levels and sought a more comprehensive estimate of anticipated agency costs and losses from below-cost timber sales. The Regulatory Impact Assessment and DEIS violate NEPA by failing to account for significant costs to taxpayers as a result of-below cost Tongass timber sales.		103, 198
156	Commenters wrote that timber sale projections used in the 2016 Forest Plan exceed the industry needs and that timber available for harvest with the Roadless Rule in place satisfies the current market demand. Commenters referred to recent research showing that merchantable volumes for sites open to timber harvests surpass past and future old-growth sale volumes.		184, 313, 369
157	Commenters expressed a concern that exempting the Tongass from the Roadless Rule may lead to more federal funds spent on timber subsidies and that losses incurred for administration of the timber program illustrate making more lands available to the program would not be prudent. Further, that high production costs and distance to market would make this timber unprofitable. Commenters wrote that reforming timber sale administration on the Forest prior to development of a rule would better align the agency's management priorities and responsibilities with the needs of the local and indigenous communities.		323

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
158	Commenters expressed concern about the removal of trees and harm to the old-growth ecosystems that provide mental, spiritual, and physical well-being to people. Removal of old-growth trees and secondary development would result in degradation of the environment and loss of the wilderness that will not recover quickly, leading to spiritual and cultural loss for many generations. The negative mental, spiritual, and physical impacts resulting from loss of the old-growth forests would be magnified for those who witness it directly.		3, 339
159	Commenters were concerned about negative impacts to the quality of the total environment and subsequent negative impacts to human health and well-being because the quality of the total environment (soil, air, water, and food) is intrinsically connected to human health and survival.		4
160	Because changes to Roadless Rule protections may lead to natural resource extraction and developmental activities, commenters expressed concern that cultural traditions would be affected, could stop and would not be taught to future generations.		5, 190
161	Commenters expressed concern that 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.		16 (S),
162	Commenters expressed concerns that the EIS violates NHPA because cultural and historic resources exist within the project area and cultural surveys have not been conducted in coordination with Alaska Native Tribes.		19, 49, 143,
163	Commenters said that environmental justice concerns for the proposed rule should be considered as effects on culture, not solely based on race designations.		37
164	There was concern that compliance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was insufficiently analyzed because Organized Village of Kake tribal citizens rely on the surrounding intact habitat provided by inventoried roadless areas for our food security, cultural practices and traditional way of life. Therefore, tribal communities would be disproportionately impacted by proposed regulatory changes which would be a potential violation of regulations concerning environmental justice.		144
165	Commenters were concerned that the impacts of climate change that would result from increased development authorized by a full exemption from the 2001 Roadless Rule stand to disproportionately affect minority communities, especially rural Alaska Natives communities in Southeast Alaska.		303
166	Commenters said that the Tongass National Forest is critical to Native Alaskans and the general southeastern Alaskan communities for various subsistence activities such fishing for salmon, hunting for moose, and foraging for wild foods. Low-income families require subsistence to keep a stable food supply.		336
167	Commenters sought site-specific information showing whether guided visitors are now using areas classified as "Roaded Natural" or other more developed settings and further effects analysis to describe the impacts of displacement and congestion on outfitter/guides. The outfitter/guide analysis is inadequate because it does not disclose the locations where future logging is likely to occur. Rather, the analysis simply shows the number of suitable acres added in large geographic areas.		60 (part 1)
168	Commenters provided opposing views about the impacts of logging on the tourism industry, some saying it does impact the industry and others saying it does not.		371

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
169	The outfitter/guide analysis is inadequate because it only assesses the impacts of acres considered suitable under the current Forest Plan and not all IRA acres that are in development LUDs and could be designated suitable for timber under future Forest Plan amendments		61
170	Commenters were concerned with road access. Some expressed concern about the unmet need for access under the current rule, as well as seeking to get and retain public access to newly constructed roads built for timber sales and other projects. Commenters said that removing Roadless Rule protections would allow more roads to be built which would decrease traffic congestion and allow locals better access to hunting grounds. Others expressed concern that increased access would lead to resource degradation. Commenters were concerned that increased development of roads would lead to increased commercialization in the area.		78, 134, 227, 229, 236
171	Commenters opposed language in the exceptions under Alternatives 2 through 5 that would require the Responsible Official to decide whether a road is needed. Commenters consider this an unnecessary requirement that impedes development because the decision is made without any criteria and development projects are sufficiently regulated by meeting requirements for complex federal, state and local permitting, and complying with the Forest Plan and other requirements.		233
172	Commenters expressed concern that the DEIS understates the impacts because it does not recognize that shifting timber production from roaded areas to roadless areas would result in more road building, causing greater environmental impact.		54, 207
173	Road building is not cost-effective and is a waste of taxpayer money, while damaging the fragile and unique forest.		85, 132, 240, 257,
174	Commenters expressed support for building additional roads.		243, 344
175	Commenters said that additional access roads are not needed for timber harvests because the existing roads are sufficient.		246
176	Commenters expressed concern that the DEIS did not accurately describe the current limitations on the construction, operation, and maintenance of roads and utilities connecting the communities of Southeast Alaska.		288
177	Commenters sought a comparative summary format in Chapter 1 for Water Quantity and Quality, Air Quality, General Vegetation, General Wildlife Species/Habitat, and General Aquatics. The general discussion for impacts to Wetlands in Chapter I, Purpose and Need for the Action (p. 1-9), was suggested as an example of a comparative summary among the alternatives.		116
178	Commenters were concerned that maps did not provide an accurate picture of existing protections that cover much of the Tongass. As an example, maps did not clearly identify the various protective land use designations for the Tongass, such as areas designated as Wilderness, LUD II, and National Monument lands.		308
179	Commenters sought clarification on the process for subsequent NEPA analyses for future ground-disturbing activities and how future site-specific NEPA analyses relate to this EIS as well as the 2016 Forest Plan Final EIS. Commenters sought a graphic display, such as a flow chart, to better explain the process and the relationship to other NEPA documents.		120
180	Commenters sought a summary of the effects for each of the various impacts from the 2016 Forest Plan Amendment Final EIS to reduce the need for the reader to search for the summary findings in the 2016 Forest Plan Amendment Final EIS.		292
181	The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The Projected Timber Sale Quantity is insufficient to determine maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.		200

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182	Commenters were concerned that the DEIS improperly relied on the 2016 Tongass Forest Plan Amendment EIS as an excuse for not disclosing environmental effects. For example, in the issues dismissed section the Forest Service dismisses soils, yet Alternative 6 opens the amount of land to "high hazard" soils to commercial logging by 38 percent but the DEIS denies that further analysis is needed.		57
183	Comments suggested "remoteness" as defined in the EIS should be replaced with desired Recreation Opportunity Spectrum (ROS) descriptions and that the EIS should describe that, "Primitive, semi-primitive non-motorized, and semi-primitive motorized Recreation Opportunity Spectrum class settings have a natural or natural-appearing environment. These ROS settings are not suitable for timber production."		295
184	Commenters sought inclusion of effects analysis for the renewable energy sector; how would the proposed rule change the facilitation of renewable energy development including hydropower, geothermal, and wind.		126, 276
185	Commenters were concerned with the lack of mention of the federal power site classification and Southeast Intertie, its authorization in the Public Law, and its support from the Southeastern Alaskan communities. Only Alternative 6 permits or recognizes the legal standing of the US federal power site classification on select hydropower resources. Commenters asked that the contradiction between Public Law 106-511, Title VI, and the Roadless Rule be addressed.		276, 289
186	Commenters were concerned about long-term financial impacts from lack of access for maintaining transmission lines. Rights of way must be maintained and continually brushed and structures must be inspected on an annual basis.		227, 276
187	Commenters sought effects analysis for mining projects that may occur following a rule change.		62
188	Commenters said that changing the Roadless Rule for mineral access is unnecessary as the Mining Act of 1872 ensures access to minerals, transportation, and energy development needs in the Tongass National Forest.		264
189	Commenters said that the 2001 Roadless Rule inhibits access to new leases for minerals, including geothermal resources, and that it inhibits mining and other mining related activities that are protected by U.S. mining laws. Discovering economic mineralization requires exploration to determine size and grade, which is not feasible without roads. The Roadless Rule also inhibits mining because it does not allow cutting and removal of trees associated with mining exploration and development. Exploration requires an ever-increasing level of investigation to add certainty to resource/reserve information to support financing in public markets		263
190	Natural resource extraction like mining is environmentally safe and has a small, temporary footprint. Regulations by permits require that mines including the roads, infrastructure and surface impacts are reclaimed upon the end of mine life.		262
191	Commenters sought keeping the Roadless Rule in place because exemption could lead to disturbances in sensitive habitat that would negatively impact both plant and animal communities and cause decreased biodiversity in the Tongass.		73
192	Commenters sought keeping the Roadless Rule intact to protect the old-growth habitats which provides sensitive habitat for over 30 endemic species.		95, 131, 309, 311, 312,
193	Commenters were concerned that activities would accelerate mass extinction. Changes to Roadless Rule protections could lead to natural resource extraction and developmental activities, reducing the acreage of suitable undisturbed habitat for sensitive species. This loss of habitat would reduce population sizes of sensitive species and increase their risk of extinction.		94

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
194	Commenters were concerned that exempting the Tongass National Forest will lead to activities that would harm the survival of the Prince of Wales flying squirrel, both a keystone and indicator species that is endemic to the area.		131, 305
195	Commenters were concerned that the proposed rule would violate the Endangered Species Act (ESA) for various ESA listed species such as the marbled murrelet, short tailed albatross, humpback whale, and Eskimo curlew. Commenters asked that the EIS identify all the listed species that may be present and affected in the action areas and questioned findings showing minimal consequences on the survival of the species as well as the lack of a biological assessment.		56, 100
196	The DEIS does not discuss the impact of environmental issues that it claims to address and instead references the 2016 Tongass Forest Plan Amendment EIS. The DEIS must be changed to discuss significant environmental impacts rather than simply incorporating them by reference. The majority of this DEIS relies on the biological assessments (BA) conducted by the National Marine Fisheries Service (NOAA) for the 2016 Forest Plan. However, the new Forest Service plan is fundamentally different to that introduced in 2016. The new plan aims to open areas for logging that will no longer be protected by the Roadless rule.		65,
197	Commenters sought consideration of the science of the impacts of island ecology as key regions for sustaining the evolutionary processes related to diversification.		181, 199,
198	Commenters sought information on plans to restore or maintain the diversity of ecosystems and habitat types within the planning area including large-tree old growth and old-growth cedar stands.		294
199	There was concern about the adequacy of effects analysis for Old-growth Habitat. Commenters referred to the 'Old-growth Habitat Conservation Strategy' as outdated and were concerned that the DEIS does not consider the impact of high grading, habitat connectivity, climate change, and road effects. Determining the impact of exemption on old-growth trees requires mapping the quantity, age, and species of old-growth trees in the Tongass, taking inventory of champion trees, and preserving the genetics of old-growth trees. The DEIS also needs to consider and document the aerosols, pheromones, and chemicals that the oldest and largest trees of each species and subspecies of tree in the Tongass produce.		130
200	Commenters sought disclosure of deficiencies of the Old-growth Habitat Conservation Strategy for conserving goshawks.		167
201	There was concern that the temporal scales used in the DEIS rationale for maintaining viable, well-distributed wildlife populations are not correct for projecting the loss of old-growth habitat and its impact on species. The analyses refer to 100-year projections, yet it takes at least 250 years for Tongass forest lands to reflect characteristics of old-growth forest structure. The population viability analyses should include a time horizon of at least 250 years.		128
202	Commenters sought analysis of the effects of roads on air, light, sound, endangered species, wildlife, wildlife habitat, wildlife habitat connectivity and movement corridors within the project area as well as on and between nearby National Park Service (NPS)-managed lands. Commenters requested the analysis include impact to night skies, natural sounds, air quality, and landscape composition on NPS lands, as well as fish and the natural flow and character of waterways such as the Skagway River.		131, 92, 175

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203	Commenters sought effects analysis for Alexander Archipelago wolves, that provides site-specific baseline information on impacts to wolf populations, survival and viability. Commenters were concerned with the effects analysis for wolf due to reduced deer habitat capability, road density, development, habitat fragmentation, den disturbance, and impacts to reproductive success. Commenters sought analysis of effects associated with how opening previously inaccessible acres to roadbuilding would increase wolf harvest from legal and illegal hunting and trapping.		166, 201
204	Commenters sought cumulative effects analysis for bears and bear habitat associated with future logging or roadbuilding that could occur if areas were exempted from the Roadless Rule.		171, 318
205	Commenters were concerned with analysis of the impacts on endemic terrestrial mammals (examples included ermine, flying squirrel, Pacific marten, and wolves) and the findings of a moderate to high probability of maintaining viable, well distributed wildlife populations for all species identified for the DEIS. Commenters questioned whether scientific rationale was used or scientific analyses beyond referral to the Habitat Conservation Strategy in the 2016 Tongass Plan. There was concern that many of the species, including endemic mammals and Management Indicator Species such as the American marten, illustrate declines on the Tongass since large-scale, industrial logging began in the 1950s.		131, 188, 309, 311, 312
206	Commenters sought effects analysis for marbled murrelet.		169
207	Commenters sought effects analysis for road construction or other activities that would pose environmental risks to marine wildlife and marine habitat.		131, 187
208	Commenters requested that the best available information be used in analyzing effects for Prince of Wales ermine.		173
209	Commenters sought cumulative effects analysis to determine if exemption threatens		167, 317
210	There was concern that the specific wooded areas which represent prime timber-		38 (S),
211	Commenters sought separate effects analysis for two species of marten present on the Tongass National Forest due to one having an extremely limited range. American marten and Pacific marten are both found on the Tongass National Forest.		164

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
212	Commenters identified Sitka black-tailed deer as the most important land mammal species for traditional and customary use by indigenous peoples of Prince of Wales Island. Commenters were concerned that deer populations have already decreased due to environmental pressures such as timber harvest and development and because they expect changes to the Roadless Rule would lead to natural resource extraction and developmental activities, there was concern about adverse impacts and cumulative effects on deer habitat. Other respondents anticipated improved deer population numbers for hunters as outlined in the Quality Deer Management Association methods. Commenters sought effects and cumulative effects analysis for Sitka black-tailed deer and deer winter range including an evaluation of the size of deer populations in roadless areas, annual harvest of deer for subsistence, and the percent of deer using roadless areas versus those using previously harvested areas in the winter months. Commenters are concerned that removing roadless protections would negate the larger Tongass conservation strategy and that analysis is needed to either a) prove otherwise; b) conclude that the conservation strategy without roadless is adequate; or c) result in a change in program direction to fully ensure that there is a viable and robust population of Sitka black-tailed deer across the landscape that can survive winters with heavy snow. Area-specific requests were also made for inclusion within the analysis, which includes Duffield Peninsula. Concerns that old-growth timber harvest at higher elevations will create bottlenecks restricting movement of deer were expressed. Concerns that restrictions on altitudinal migration and movement will lead to starvation and death, negatively impacting total deer populations were expressed. Additionally, concerns were expressed about young-growth forests growing thicker and reducing sunlight to the understory. The reduced light source prevents vegetative growth in the understory that provides important food sources for deer. Commenters sought assessment of the stability of deer populations as a function of deer habitat and commented that the removal of lower elevation productive old-growth forest habitats is a key factor in determining the effects of an action on the species.		152, 165, 306, 307,
213	When road systems are connected to communities, commenters sought road density limits (no greater than 0.7 mile of open roads per square mile of forest) to reduce impacts associated with overharvest of important game and furbearing species in the area.		237, 314
214	There was an expectation that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities that would negatively impact the viability of apex predators, including bears, which are important for regulating populations of herbivores such as moose, elk, caribou and provide economic, social, and cultural benefits.		314, 318, 322
215	Commenters were concerned that the wildlife viability assessments conducted for the Forest Plan to determine viability risk for 30 endemic species had flaws with the calculations, which resulted in substantially underestimated viability risks for wildlife.		65, 77, 131,
216	Commenters said that the Roadless Rule protects habitat for the Prince of Wales spruce grouse and the northern goshawk, which are environmentally and culturally important. There is concern that roadbuilding and development activities may decrease nesting and foraging habitat and increase mortality rates.		315, 317
217	There was concern that natural resource extraction and development, that could occur throughout the Forest should there be an exemption to the rule, would fragment habitat and destroy landscape connectivity.		79, 181, 370

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
218	Commenters sought additional analysis on causes and impact of decreased biodiversity associated with the clear-cutting and timber industry activities that changing the Roadless Rule would allow, taking a wholistic view of the ecosystem and understanding the full cycle of ecosystem wellbeing and biodiversity as an invaluable resource. Commenters sought analysis of effects to the rainforest ecosystem that 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.		53 (S),
219	Commenters sought effects analysis considering habitat contiguity to provide refuge for wildlife impacted by climate change. Habitat connectivity facilitates wildlife adaptation by allowing wildlife to adjust their home ranges and movement patterns.		160
220	Commenters sought additional effects analysis considering the cumulative impacts of deforestation and climate change and changing the Roadless Rule on the existing and future declines for deer population and the required minimum deer population capabilities of existing ecosystems.		86 (S),
221	Commenters said that 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.		87 (S),
222	Commenters were concerned that removing Roadless Rule protections could lead to increases in human-wildlife conflict, threatening the well-being of humans and wildlife.		321
223	Roadless Rule protections could lead to natural resource extraction and developmental activities that resulting in displacement of wildlife and have detrimental effects on functional behaviors such as breeding and movement, that are essential for functional, healthy wildlife populations.		267, 324
224	Commenters stated that wildlife use roads and may be affected by road development.		234
225	Commenters said that Roadless Rule protections helped maintain salmon populations which helps preserve the food source for bears, sustaining their population numbers.		314, 318, 320
226	Changes to Roadless Rule protections could lead to natural resource extraction and developmental activities resulting in activities that negatively impact rare and endangered species.		100, 325
227	Commenters sought disclosure of how the agency would restore or maintain the diversity of ecosystems and habitat types within the area affected by the proposed changes to the Roadless Rule and that large-tree old growth be considered a distinct habitat type. Commenters described large-tree old growth and old-growth cedar stands as being at risk of being eliminated on northern Prince of Wales Island and other bio-geographic areas on the Tongass. There was concern that reductions in these forest communities would lead to a reduction in Sitka black-tailed deer populations and Alexander Archipelago wolf populations on Prince of Wales.		48, 309, 311, 312
228	The DEIS relies on outdated and inadequate monitoring data for goshawks and other wildlife in order to support its conclusions. The agency has not presented the limited wildlife survey data conducted in connection with timber sales or explain how these monitoring data have helped inform the DEIS.		65
229	The DEIS fails to rationally assess impacts to migratory birds.		92, 131, 175, 188, 267, 284,
230	The Forest Service must reinitiate ESA consultation before adopting the proposed rule. The		100

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
231	Commenters disagreed with DEIS findings and expressed concern about effects analysis for fish and the region's commercial, sport, subsistence and ursine fisheries. Commenters requested the use of more current baseline data, including consideration of climate change, in this analysis. Commenters sought analysis for anadromous fish streams, salmon (including coho and pink) habitat and survival. In analyzing effects for fish, commenters sought use of data that incudes current harvest data or information about project area salmon populations.		57, 58, 132, 133, 217, 365
232	Because there was concern that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities, commenters sought consideration of effects to fish, Dungeness crabs, wetlands and watershed ecosystems including soil erosion and sedimentation, edge effects on windthrow or blowdown, mass erosion and channel erosion resulting from hydrologic changes caused by logging, the effects of roads altering hydrology and erosion processes, and alteration of groundwater temperature by logging. Commenters sought analysis of cumulative effects to salmon streams and salmonid habitat associated with future road system expansion. Commenters questioned the effectiveness of mitigations discussed in the DEIS.		141, 178, 251, 316, 319
233	There was concern that changes to Roadless Rule protections would lead to natural		42
234	as windthrow/blowdown, mass erosion, channel erosion, roads, erosion processes,		178
235	Concern was expressed that the DEIS fails to adequately assess the current status of fish and fish habitat on the Tongass, discuss how the current status relates to historic abundance, and to analyze how the proposed action will affect fisheries, fish habitat, and the important waters that support these resources. Underlying the DEIS and made explicit by various statements of Forest Service officials at public meetings, is the misguided belief that expanding logging and logging roads into roadless areas will have no effect on fish and fish habitat.		217
236	There was concern expressed that the analysis assumed that logging can occur in roadless areas without harm to fish resources.		217
237	Concern was expressed that the proposed plans have not designated what protections would occur in T77 Watersheds and TNC/Audubon Conservation Priority Areas relative to new road building. Also, that the proposed plan will result in significant entry into roadless areas to access adjacent timber that is not part of these protected watersheds.		301
238	Commenters expressed concern that the DEIS analysis, which concluded that logging and road building in roadless areas would not have substantial adverse effects to soil, water quality, water quantity, and riparian conditions due to the implementation of current Forest Plan BMPs and other requirements is not valid. Concerns were related to the effects from logging and road building on high hazard soils, stream buffer effects on windthrow, effects of roads on hydrology and erosion, related effects to sediment in stream channels and stream channel stability, and upslope clearing effects to stream temperature.		105, 129
239	Commenters noted that the DEIS did not include most recent status of Pink and Coho salmon numbers especially recent decreases in abundance.		71
240	Commenters noted that declines of pink salmon appear worse in the northern inside areas of Southeast Alaska and on Prince of Wales Island. There is concern that timber harvest in these areas is a major contributing factor.		71
241	Commenters noted that low harvest number of coho salmon in 2018 and 2019 may be related to timber harvest practices including a lack of buffers on small streams and culvert blockages of fish passages.		59

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
242	Commenters expressed concern that 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.		10 (S),
243	Commenters said that fish populations are already low in many fisheries and asked if fish populations completely disappear due to change in Roadless Rule, who would be responsible for replenishing fish stocks.		8 (S),
244	Because the region is prone to windthrow, commenters sought buffer zones 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 would expose more miles of important fish habitat to these destructive practices.		61 (S),
245	Concern was expressed that roadless areas supply unique areas for protection of fish and fish habitat and this was not properly assessed in the analysis in the DEIS. Areas with limited roads often have healthier fish resources.		217, 274,
246	increased timber harvest, road building, and stream crossings have delayed final analysis		
247	Commenters expressed that the protected T77 Watersheds and TNC/Audubon Conservation Priority Areas watersheds are a small portion of the major fish producing watersheds on the Tongass and protections for these areas alone will not protect overall fish production in the Tongass and will also result in the concentration of fisheries in some areas and lack of fisheries in other areas.		
248	Past analysis of roadless areas concluded that logging related practices have the risk of affecting fish habitat and fish populations. Current analysis cannot now be justified in saying that allowing harvest and related actions in these areas can now occur without adverse effects to fish. Also, the current analysis relies on the 2016 Forest Plan analysis that concluded actions could be taken and result in minimal harm to fish resources. This analysis cannot be used to justify the conclusion of no adverse effects to changes in the Roadless Rule. Some adverse effects would be expected with even the best planned or implemented actions.		217
249	Commenters expressed that many existing barrier culverts in the Tongass have not been repaired and continue to block suitable fish habitat. Construction of more roads in currently roadless areas will add more barriers and add to the backlog of culverts that are not repaired reducing further available habitat. There was concern about the Forest's road maintenance backlog.		59,
250	Commenters sought more full consideration of the effects of climate change in both the ocean and freshwater on salmon stocks. Commenters also noted that Roadless Areas may supply better fish habitat than other Tongass Forest areas after climate change effects occur.		365
251	Because changes to Roadless Rule protections may lead to natural resource extraction and developmental activities, commenters expressed concern about soil erosion and hydrology. This included concerns about effects such as landslides, river channelization, flow patterns, streamflow, snowmelt, wetlands, changing water chemistry, and flooding. Commenters were concerned that leaving unlogged riparian forests is insufficient to mitigate for the effects of upland logging on streams.		239, 316, 319

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
252	Commenters expressed concern that exempting the Tongass National Forest from the Roadless Rule may lead to the removal of trees which would impact air quality. Removing protections can lead to indirect effects that may increase air toxic emissions, further reducing air quality. Negative impacts to air quality from the removal of trees and secondary effects would exacerbate or worsen pre-existing conditions and disease risk. An increase in disease risk could lead to increases in health care costs, creating a reinforcing feedback loop where limitations to health care access further worsen health outcomes.		1
253	There was concern that exempting the Tongass National Forest from the Roadless Rule protections would lead to climate change and the subsequent long-term economic impacts of climate change would significantly outweigh any short-term economic benefits from natural resource extraction and development. Investing in the development of sustainable and innovative resource management can mitigate climate change effects, while providing jobs for Alaskans.		46, 96
254	There was concern that developmental activities exacerbate climate change effects and will lead to communities being displaced.		302
255	Commenters were concerned that global loss of forests to deforestation and wildfires have made large intact forests increasingly rare. Exempting the Tongass National Forest can result in further loss in intact ecosystems that have global importance for sustaining life.		76
256	protections would lead to natural extraction and developmental activities that would		47, 376
257	There was concern that exempting the Tongass National Forest from the Roadless Rule protections could lead to lead to developmental activities that increase the release of greenhouse gas emissions. Atmospheric concentrations of greenhouse gases (water vapor, nitrous oxide, carbon dioxide, methane, and chlorofluorocarbons) have changed with increases of emissions from human activities such as deforestation, burning of fossil fuels, production of energy, land use changes, landfill waste decomposition, as well as industrial and agricultural practices. Increases in these natural occurring greenhouse gases reinforce the trapping of heat from the Sun on Earth. Increases in temperature can create reinforcing feedback loops that can further increase greenhouse gases in the atmosphere, examples include increased water vaporization, demand for heating and cooling, as well as increased releases of methane and carbon dioxide from thawing ice stores and permafrost.		43
258	Commenters said that by keeping the Roadless Rule protections in place, a considerable amount of carbon sequestration can occur that will contribute to climate change mitigation, while maintaining critical habitat. There was concern that exemption from the rule would lead to logging, in which case, the Forest would release considerable carbon reserves in addition to the loss of the carbon sequestration capabilities, contributing to the acceleration of climate change. Because old-growth trees sequester more carbon than new growth, the carbon sequestration capabilities cannot be recovered following logging on a time scale sufficient for the mitigation demand. Removal of trees and secondary development activities (logging, road construction, resource extraction) that damage the old-growth ecosystem will impact the capacity of other flora to sequester carbon. Climatic changes disrupt normal environmental parameters such as environmental fluid dynamics, ambient air temperature, water temperature, rainfall, and water acidity, which can have detrimental impacts on ecosystem services and natural resource availability.		45, 87
259	timber overseas, asking that it be properly accounted for as an additional impact on		72 (S),

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
260	Commenters said that exempting Tongass National Forest from the Roadless Rule protections will lead to natural extraction and developmental activities that would accelerate climate change effects negatively impacting human health and survival.		44
261	Commenters sought effects analysis disclosing how the proposed rule change will directly and indirectly impact carbon stores and sequestration, as well as the resulting environmental and economic effects from climate change associated with the rule change. Commenters sought analysis of either the potential value of carbon storage on the Tongass or the socioeconomic costs of carbon emissions and associated climate effects. Commenters were concerned that there was a lack of analysis associated with increased road construction, logging, and mining with the comprehensive cumulative impacts that would 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.		153
262	Commenters disagreed that logging in the Tongass National Forest could lead to reductions of greenhouse gases.		68
263	The DEIS inadequately analyzes and unlawfully discounts the proposed rule's potential climate impacts. The DEIS unlawfully discards in silence the Forest Service's earlier conclusions that logging on the Tongass can cause significant greenhouse gas emissions.		1, 43, 153, 276
264	The Forest Service violated NEPA and NFMA requirements to use high quality, accurate, scientific information by failing to recognize the global importance of the Tongass for carbon storage; use of an inappropriate analysis scale to understate the value of the Tongass; and analyze that old growth forests in roadless areas store substantially more carbon than saw logs and young growth.		103
265	The DEIS failed to disclose the economic value of roadless areas of the Tongass on the carbon markets and the social cost of carbon emissions resulting from logging.		43, 45, 153,
266	When the Forest Plan was originally developed it was based on the best available information; however, new information is available regarding the impacts of climate change on the area that should be incorporated into the Forest Plan.		286
267	change, road development, and logging on watersheds considered “safe havens”, refugia,		365
268	Roadless Rule changes affect the opportunity, or lack, for renewable energy development (ex. Southeast Alaska Intertie) which has climate change impacts.		126
269	Commenters sought expanded regulations to ensure that timber industries are restricted from logging in any old-growth and rainforest habitats.		243a
270	Commenters sought more site-specific analyses.as they believe the assumption used in the DEIS for even distribution of logging is arbitrary and the EIS needs to make a reasonable projection of likely areas of logging. The Forest Service should provide this analysis based on VCUs.		127, 179
271	Commenters said that virgin old growth forests may have future research potential and resources that could lead to new medicines and medical treatments.		335
272	The assumption that the Roadless Rule will not result in additional logging is arbitrary and capricious because the PTSQ is not a limitation on harvest as described in the DEIS and increased harvest is reasonably foreseeable. The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The PTSQ is insufficient to determine maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.		200

Appendix H Concern Nu	Appendix H Concern Text	Concern Spreads	CARA Concern (S=Subsistence)
273	Commenters were concerned that the assumption that harvest levels would be equal across the action alternatives was flawed. The Forest Service fails to provide any support for its claim that the proposed rule will not increase logging in the Tongass.		127
274	The assumption that changing the Roadless Rule will not lead to changing the forest plan and, subsequently, subject more than 165,000 additional acres to logging is flawed.		112
275	Commenters expressed concern and sought effects analysis that considered the potential increased quantity of roads and acreage impacted to harvest the same amount of timber from young-growth, at 65 years of age, instead of waiting until the timber was at its maximum growth potential of 90–100. Commenters also sought information about reforestation plans for projects that may occur following an exemption to the rule.		63, 69,
276	Commenters provided input about logging practices in Alaska and logging in roadless areas. Some said that logging either enhances, or does not harm, watershed ecosystems and others expressed support for a second growth timber management strategy and still others were concerned with the sustainability of current harvest practices. There was concern that logging in roadless areas would impact a greater area and cost more than areas with roads and that logging old-growth also requires building more roads than logging young-growth. There was support for logging and forest treatment practices that are sustainable and protective of ecosystems and communities.		184,250, 252, 260, 261
277	Commenters sought a discussion in the EIS considering young-growth as a sustainable supply when compared to old-growth and a productivity comparison of young- and old-growth.		70
278	Commenters were concerned about the cost and necessity of logging old-growth and intact forests when compared to the costs for other timber resources available for harvest that are more sustainable and cost efficient.		66, 85
279	Commenters sought consideration for changing the roadless areas to Wilderness.		190
280	Commenters sought effects analysis for changes in roadless status of Tongass National Forest lands adjacent to National Park Service-managed wilderness and how they may affect wilderness qualities, viewshed, and visitor experience within the Glacier Bay National Park Wilderness.		185, 193
281	Commenters expressed concern that the Forest Plan does not protect roadless area values in Development LUDs and that removing roadless area protections provided by the "not suitable for timber production" plan component would lead to degradation of unroaded area values.		297
282	Commenters were concerned that removing the Roadless Rule in Alaska could lead to the precedent of removing Roadless Rule protections in other areas which could lead to a precedent of excessive logging and road construction in forests across the United States.		91
283	Comment letters included introductory narrative and other information that was reviewed and noted with no further response required.		32
284	Commenters expressed general opposition for logging in the Tongass and Chugach National Forests.		373
285	considered in the Roadless Rule issues under analysis since the rule does not adequately		276

Appendix H Concern Nu	Appendix H Concern Text
1	There was concern that the consultation with Alaska Native tribes and corporations on the Alaska Roadless Rule was inadequate, and that this may lead to impaired agency performance of its responsibility to consult and coordinate with Tribes regarding any future plan or project for the Tongass.
2	There was concern that government-to-government consultation was inadequate because tribal governments were not consulted prior to the Secretary of Agriculture acceptance of the State of Alaska's petition for rulemaking. Commenters said tribal concerns had been inadequately addressed and requests for government-to-government consultation were not responded to in a timely manner.
3	Commenters said the DEIS should have included an alternative providing Tribal Nations with a more meaningful role in management decisions affecting land in the Tongass National Forest within their traditional territory.
4	Commenters were concerned that Alternative 6 was identified as the preferred alternative after all six tribal cooperating agencies indicated opposition for a full exemption from the 2001 Roadless Rule. Further, there was concern about the Forest Service relationship with cooperating agencies because suggestions for how to improve the analysis did not seem to be taken into consideration and community use area maps were not adjusted.
5	Commenters expressed concern that the process had not respected the sovereignty of tribal governments and its citizens and that tribal governments were not included as full cooperating agency partners in the decision-making process but rather were brought in after decisions were already made.
6	Commenters were concerned that exemption from the rule may impair tribal dependent resources and sought to have the rule kept intact for the protection and preservation of these and other reserved rights and to safeguard the health, livelihood and well-being of tribal citizens.
7	There was concern that exempting the Tongass National Forest may be a human rights issue and racially motivated. Commenters saw exemption from the rule as a violation of indigenous rights that would contribute to the ongoing genocide of Indigenous Peoples whose identities, cultures, and livelihoods are integral to the forest.
8	The State of Alaska and others requested edits (additions/deletions) be incorporated into the FEIS.
9	Commenters disagree with the Forest Service's conclusion in the DEIS that "[a]n ANILCA Section 810 evaluation and determination is not required for the Alaska Roadless Rule because it is a programmatic level decision and not a determination whether to "withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of National Forest System lands." Commenters said this conclusion is inconsistent with the other facts reported in the DEIS. Others said that because the finding was not made in the DEIS, the subsequent notice and hearings were out of order and therefore prevents the USDA from making a legal Section 810 determination for subsistence. Commenters said the Forest Service violated the Alaska National Interest Lands Conservation Act (ANILCA), National Forest Management Act (NFMA), and National Environmental Policy Act (NEPA) by failing to make a subsistence finding and analyze factors necessary to make the finding.
10	Title VIII, Section 810 of ANILCA requires federal agencies having jurisdiction over lands in Alaska to evaluate the potential impacts of proposed actions on subsistence uses and needs. Commenters were concerned that the analysis of the proposed change does not adequately account for the impacts on Native peoples.
11	The Forest Service's failure to provide site-specific subsistence information and consider the Organized Village of Kake's use map in February 2019 violates ANILCA and NEPA.

Appendix H Concern Nu	Appendix H Concern Text
12	The Forest Service violated ANILCA and NEPA by refusing to consider mitigation measures proposed by Kake to protect all remaining, intact old-growth habitat in Kake's traditional use area, updating the Tongass roadless inventory to capture all roadless lands important to Kake, and allowing an improved role in management of lands in Kake's traditional territory.
13	The Langdon and Sanderson (2009) publication should be used as a resource to define the K'iis Xaadas territory discussed in Appendices E and F of the Alaska Roadless Rule DEIS, and Table E-12 of the DEIS should reflect the corrected traditional territory. This area may be smaller than the "Community Use Area" currently defined in the DEIS, however the K'iis Xaadas traditional territory is more widely recognized and is still the currently recognized traditional use area for Hydaburg.
14	There was concern that the traditional knowledge was not incorporated into the DEIS. The subsistence economy for residents of Southeast Alaska is strong, and the reliance upon fishing, hunting and gathering takes an understanding of the available habitat and environment.
15	Commenters expressed concern that a rule change would 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 users will be displaced to other areas potentially increasing competition for resources in those areas.
16	Commenters sought tabulations of 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. Commenters questioned how the impacts of historical logging or future impacts of the changed rule could be tabulated properly without baseline estimates. Commenters sought effect analysis for specific impacts 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.
17	Comments sought additional analysis about how future needs will change regionally due to changes in population growth and distribution.
18	Commenters consider the proposed change in the Roadless Rule 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. Commenters said that removing the Tongass from the Roadless Rule would produce both existential, profound, and generational impacts on local native populations.
19	Commenters said that 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 would negatively impact resources involved in the practice.
20	Commenters explained that 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 socioeconomic conditions are highly tied to local healthy ecosystems, and the potential impacts of the rule change are amplified due to a basic lack of connectivity.
21	Commenters found the term "subsistence" derogatory and that it implies a lack of creativity in utilization of resources. Local people refer to it as their "way of life". The proposed rule change demonstrates a lack of understanding about the way of life in its historical and cultural context. Living off the land is not only essential and economical, it is fulfilling and exhausting.
22	Commenters sought effects analysis considering how 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.

Appendix H Concern Nu	Appendix H Concern Text
23	Commenters sought further effects analysis of the cumulative socioeconomic impact of the loss of deer, fish, and other resources to subsistence communities over time.
24	Commenters stated that the United States has specific and enforceable fiduciary responsibilities to protect and refrain from impairing tribal dependent resources. These commenters believe that 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. Commenters said 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.
25	Commenters said that Alaska's constitution mandates that preserving resources for subsistence use be prioritized over any commercial uses and that changing the Roadless Rule would therefore be unconstitutional because it only benefits large-scale commercial logging while negatively impacting subsistence resources.
26	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. There was concern that increased roads and loss of habitat due to changes in the rule would 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. Commenters were concerned that changing the rule to increase areas open for logging would increase competition with loggers for subsistence resources that are already dwindling. Commenters were concerned that changing the Roadless Rule would further decrease access to logging areas for locals. 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.
27	Commenters expressed concern that the DEIS does not consider how exporting logs drains socioeconomic resources from the local area and subsistence communities.
28	Commenters were concerned that 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.
29	Commenters said that 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. Commenters were concerned with low deer populations due to over-hunting, rather than climate change or impacts from timber industries. Commenters said that hunting in clear-cuts is easier than hunting in old-growth forests and that changing the Roadless Rule will have a limited effect on deer hunting.
31	Commenters expressed concern with the adequacy of the analysis of effects of roadbuilding on subsistence resources. Commenters also requested the use of more current data rather than relying on the data used in the 2016 Forest Plan Amendment EIS.

Appendix H Concern Nu	Appendix H Concern Text
15	There was concern that the Citizen Advisory Committee (CAC) membership was not representative of all stakeholders and that the CAC lacked procedural safeguards, an understanding of the 2001 Roadless Rule, sufficient to make informed recommendations.
33	Commenters were concerned that CAC recommendations did not appear to be considered and/or reflected in the DEIS and that the action alternatives lacked language proposed by CAC including the new road and timber cutting exceptions.
34	Commenters expressed concern that granting funds to the State of Alaska to support the State's involvement in the Alaska Roadless Rulemaking process violated the Federal Advisory Committee Act, was a misuse of congressional appropriations, and created a conflict of interest.
35	Commenters express concern about the Forest Service's ability to manage forests, as they do not have the staff nor the budget to adequately enforce management of the forest. Commenters provided examples of land management best practices for logging not being followed regionally and concern that expanding areas available for logging would only spread the implementation of harmful practices.
36	Commenters were concerned that Alternative 6 is in direct conflict with the Tongass Land Management Plan (Forest Plan), and that moving forward with the proposed rule would negate the Forest Plan, requiring it to be updated. Commenters said that the Forest Plan should be updated before making any changes to the Roadless Rule's protections.
37	Commenters expressed concern about changes to the Forest Plan, saying that any substantial changes to suitable timber designations were not significantly raised during scoping and any substantial changes to suitable timber designations following the exemption of the Tongass National Forest from the Roadless Rule would require following the rulemaking guidance for Special Areas, Forest Plan Amendment Revisions, and the Administrative Procedures Act before the Forest Service could authorize any road construction, reconstruction, or timber harvest in those areas. The 2016 Forest Plan does not address the impacts that changing timber suitability designations would have on roadless areas, which is required. The proposed changes would modify the Forest Plan as amended, including determinations that the Forest Plan is in alignment with Tongass Conservation Strategy and Recreation Opportunity Spectrum guidance.
38	Commenters were concerned that if a Roadless Rule exemption occurs, the Forest Service will then revise or amend the 2016 Forest Plan. They believe a forest plan revision or amendment is reasonably foreseeable since the State of Alaska's petition specifically requested changes to the Tongass Forest Plan and the commenter(s) believe that rebuilding the timber industry in Southeast Alaska is the purpose of the Alaska Roadless Rule.
39	The Forest Service cannot administratively change the designation of lands suitable for logging because only a forest plan revision or amendment can be used to change a "plan component."
40	Commenters supported changes to the Forest Plan for increased timber harvest, including old growth. Some suggested the Forest Plan be revised to eliminate the transition to a predominantly young-growth timber program.
41	There was concern that adjustments to timber suitability or old growth harvest acres by the proposed rule and alternatives would require amending or revising the Forest Plan to modify desired conditions and land suitability decisions to include IRAs. Commenters said there is no demonstrated urgent need for changing the Roadless Rule and that any Forest Plan revision should occur as a parallel process with the Roadless Rule change. Further, there was concern that the Timber Priority Area management category, as presented in Alternative 4, is not a narrowly focused exception to roadless area desired conditions.

Appendix H Concern Nu	Appendix H Concern Text
42	Commenters were concerned that the use of the administrative change procedure to reclassify vast tracts of pristine old-growth forest to facilitate logging without amending the Forest Plan is not consistent with the intent of the administrative change provision in the 2012 Planning Rule. There was concern that this issue was not sufficiently identified or discussed by USDA or the Forest Service during scoping.
43	Commenters were concerned that an exemption would undermine the collaborative work that went in to developing the Forest Plan. In the development of the Forest Plan, the collaborative group recommended phasing out large-scale old-growth logging over a 16-year period, easing standards and guidelines to allow increased access to young-growth timber as a way of encouraging the transition away from old-growth logging, and protecting important areas from future logging, including roadless areas, the Tongass 77 (T77) watersheds, and The Nature Conservancy (TNC)/Audubon Conservation Priority Areas. The expectation of the Forest Plan collaborative group was that its recommendations be taken as a whole and not adopted partially or in a piecemeal manner.
44	Commenters request that the forest be managed by the Forest Service to meet the agency mission and for multiple use and the health of the forest.
45	Commenters said that control/management of the Tongass National Forest should be given back to the State of Alaska.
46	Commenters were concerned that activities in old-growth stands would lead to a loss of opportunity to inventory, study and to further understand the aerosols, pheromones, and chemicals that occur with the oldest and largest trees of each species and subspecies of tree.
47	Commenters referred to how clearcut 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.
48	The Forest Service's proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests.
49	Commenters asked whether the Chicken Creek area on the north end of Chichagof Island which is presently managed under the Old-Growth Habitat LUD would remain protected under the full exemption alternative (Alternative 6).
50	Commenters sought a Forest Plan amendment to include updates to the suitable lands designation and timber transition strategies in consideration of the economic viability of the timber industry.
51	Commenters are concerned that the project will reduce scenery standards and values on NFS and adjacent lands by allowing additional clearcutting, namely through Forest Plan Amendment.
52	Commenters were concerned that projecting over 25 years is not appropriate because Forest Plans should be revised every 10-15 years.
53	Commenters stated that the Change to Timber Land Suitability acres should be updated to remove the Alaska Roadless Areas and LUD II Priority lands and reflect that timber production will not occur in these areas. Designated Alaska Roadless Areas and LUD II Priority lands are not suitable for timber production, since timber production and road construction are inconsistent with Roadless Area and LUD II desired conditions.
54	Commenters were concerned with the proposed provisions that allow changes to designations within the Chugach National Forest. Commenters felt the provisions were too broad and not specific enough and could lead to additional logging and associated impacts in the Chugach. Commenters sought clarity as to the definition and scope of modifications and classifications for Chugach NF proposal, and sought a more thorough discussion of the Chugach in the EIS. Some commenters were concerned that the administrative boundary provisions for the Chugach National Forest were not part of the State's petition and not responsive to the purpose and need, and thus felt it should be removed.

Appendix H Concern Nu	Appendix H Concern Text
55	Commenters suggest the Forest Service extend the exemption from the Roadless Rule to the Chugach National Forest to improve access for hydropower development.
56	The State of Alaska's petition does not reflect the national importance (described in the 2001 Roadless Rule) of the Tongass National Forest roadless areas and gives preference to the State of Alaska's desires for local timber production.
57	Commenters asked how changes to the Roadless Rule would help the agency meet its responsibilities for sustaining health, diversity, and productivity of forests to meet the needs of present and future generations.
58	Commenters question the need for project because the 2001 Roadless Rule already provides flexibility and natural resource extraction through exemptions.
59	Commenters question the need for the exception that allows for timber harvest to improve, restore or maintain fish and wildlife habitat.
60	The purpose and need statement is vague and confusing and lacks meaningful criteria for formulation and comparison of alternatives.
61	The proposed rule gives preference to the State of Alaska's idea of local timber production desires and does not support the national need to protect roadless areas within the Tongass National Forest.
62	Commenters are concerned about the rationale used to support and demonstrate need.
63	Commenters stated that exempting 9.2 million acres of inventoried roadless acres (Alternative 6) would not resolve controversy with regards to managing roadless areas and does not adequately meet the purpose and need.
64	Commenters state that the Roadless Rule should reinforce the Tongass Advisory Committee (TAC) recommendations in the 2016 Forest Plan by protecting the Tongass 77 watersheds and TNC/Audubon Conservation Priority Areas. The TAC can serve as a roadmap for incorporating public interest and economic realities into an Alaska Roadless Rule.
65	Commenters were concerned with the adequacy of public involvement efforts, such as, length of the public comment period, requests for additional public meetings (including outside Alaska), opportunities for oral testimony at public meetings, and scoping being initiated late in the process. Commenters felt that decisions of this magnitude should be discussed and decided over a longer period of time. Some commenters believe USDA and the Forest Service are in violation of the 1st Amendment by not allowing oral testimony. Another commenter felt that public hearings should allow for anonymous statements from community members who are not comfortable stating their names for the record. Commenters requested community education workshops on the 2001 Roadless Rule.
66	There was concern that the rulemaking processes contributed to a practice of discrimination by minimizing or eliminating the voices of marginalized and low-income communities.
67	Commenters expressed concern that Native Tribes, organizations, and people are not properly supported, represented, heard, or understood when it comes to these kinds of regulatory changes and that involvement processes are not effective.
68	Commenters expressed concern that the agency does not heed the will of the public majority when it comes to action on public lands and that results in consequences, such as increased logging with effects like habitat destruction, patchworks of roads, clear cuts and wide-reaching negative impacts.
69	Commenters questioned how and whether public opinion would influence decision making. In addition, given challenges with attending hearings in-person (distance, access, obligations, scheduling), commenters suggested that public opinion counts should be weighted to reflect that those unable to attend likely agreed with the majority present.
70	Commenters sought public outreach about Alternative 6 to reduce opposition through education by clarifying that concern about environmental effects of large-scale clearcutting is based upon inaccurate information and not supported by USDA rules governing timber sales.

Appendix H Concern Nu	Appendix H Concern Text
71	Resolutions were received from local governments in support and opposition of exempting Roadless Rule protections for the Tongass National Forest.
72	Comments and resolutions were provided in support of the Southeast Alaska electrical intertie and transportation corridor projects to promote regional economic development.
73	Commenters sought disclosure of public opinion about the proposed exemption.
74	Respondents said that the DEIS should have included an alternative that updates the roadless inventory to include all roadless areas that were not included as inventoried roadless areas under the 2001 Roadless Rule.
75	Commenters suggested modification of some alternatives by including components of another alternative (mixing and matching). An example of this would be modifying Alternative 2 by adding the proposed regulatory prohibition of old-growth harvest in T77 Watersheds and TNC/Audubon Conservation Priority Areas outside of roadless areas (similar to the Forest Plan) that is part of Alternative 3.
76	Commenters expressed concern that the DEIS did not satisfy the requirements of NEPA. There was concern that DEIS does not present a range of reasonable alternatives and that the alternatives presented were contradictory with arbitrary differences in roadless acreage and logging.
77	The Forest Service does not explain the differences between the administrative boundary correction and modification provisions proposed for Alaska and prior similar provisions.
78	Commenters express concern regarding the existing regulatory language which was retained from the 2001 Roadless Rule.
79	Commenters expressed preference for Alternative 1 and then provided secondary preferences. Individuals listing Alternative 2 as a secondary preference did so because there would not be a significant net change in acres protected. Commenters expressed that each national forest belongs to all Americans and should be protected by the Roadless Rule.
80	Commenters requested that the Forest Service select an alternative that balances environmental protections with economic development.
81	Commenters expressed opposition to both Alternatives 4 and 5 as they would convert inventoried roadless areas into roadless priority areas, reducing protections for these designated areas.
82	Commenters supported providing regulatory protection of areas identified in the 2016 Forest Plan as T77 watersheds and TNC/Audubon Conservation Priority Areas (high-priority watershed areas) that are outside of designated roadless. Specifically, old-growth timber harvest would be prohibited, as is proposed as a component of Alternative 3.
83	Commenters request the Forest Service reinstate the Transportation Utility System Land Use Designation (TUS LUD) that had been removed in the 2016 Tongass Forest Plan. This would allow access for renewable energy projects that would have climate change benefits and benefit the local community.
84	Commenters sought an alternative that broadly protects fish habitat, continues the phase-out of industrial scale old-growth clear-cutting, and prioritizes the restoration of degraded watersheds and streams.
85	Commenters sought protections in addition to what is offered by the existing rule. For example, minimizing additional clearcutting and adding lands set aside for specific cultural significance (e.g. old-growth trees like red cedar required for canoes, etc.).
86	Commenters express support for designating specific areas in the Tongass as managed tree farming zones.
87	Commenters express support for designating the Tongass as a national monument and others supported designation as a National Park to increase protections.
88	Commenters expressed support for expanding the Roadless protections in the State of Alaska, so additional lands would be designated as off-limits to development. Commenters also specifically requested expanded protections for T77 Watersheds and TNC/Audubon Conservation Areas outside of current roadless areas.

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89	Commenters requested that projects already allowed to be permitted in roadless areas should be expressly provided for in any new Alaska Roadless Rule, including the powerline corridor to Takatz Lake, Blue Lake, or Glacier Lake licensing or relicensing or additional generational capacity, and corridors for road connections.
90	Commenters request protection for specific watersheds or areas that have been identified as the most important to their community, notably but not limited to encompass culturally and traditionally important sockeye salmon systems. In many areas within these watersheds, the 2001 Roadless Rule are the only protections that apply. Further, the Watershed Priority management category applied to TNC/Audubon Conservation Priority Areas and Tongass 77 Watersheds does not add any additional protections for these areas as these watersheds were not included on the lists of those areas.
91	Commenters sought preservation of key wetland areas in the Tongass, such as the T77 Watersheds and TNC/Audubon Conservation Priority Areas.
92	Commenters provided input in both support and opposition of each Alternative.
93	Commenters expressed opposition to changing the Roadless Rule protections for the Tongass and Chugach National Forests. Rationale for maintaining the current rule (Alternative 1) include preserving old-growth habitat and avoiding habitat fragmentation. Commenters expressed belief that reducing protections would result in an increase in timber harvest and road building that, in turn, would result in increased adverse impacts to multiple resources (e.g., habitat, watersheds, subsistence). Commenters were generally opposed to exemption because they believed it would result in harm to the environment and to tribal dependent resources. Many generally objected to resource extraction by private industry. Many supported Alternative 1 over exemption because it was more protective of natural resources and still provided economic development.
95	Commenters expressed opposition to changes of the Roadless Rule protections for the Tongass and Chugach National Forests because they felt this process disregarded local input, collaboration, and the public interest. Commenters stated support for local decision-making for forest projects, activities, and rules.
96	Commenters expressed support for changes to the Roadless Rule, including the full exemption, because they believe the 2001 Roadless Rule (Alternative 1) is too restrictive. Commenters believe the Roadless Rule does not provide flexibility for timber and mining industries, forest treatment to prevent fires or manage for grazing, and impedes renewable energy and other development.
97	Commenters expressed concern about the phrasing of the proposed action changing between publishing the Notice of Intent and the 2019 publication of the Notice of Availability of the DEIS for comment.
98	Commenters explained that adding the suitable timber lands proposed in the exemption would provide the necessary flexibility in selection to allow the Forest Service to offer economic timber sales that meet the needs of the timber industry and provides for other development on the Tongass that contributes to rural economies.
99	Commenters expressed that the proposed rule will lead to the extraction of natural resources, which will bring jobs to the area, reduce demand for select imports, and stimulate the economy. Additional roads and rights of way for utilities are necessary for economic development, particularly for the 29 of 32 communities in the region that are not connected to the nation's highway system and are typically surrounded by marine waters and undeveloped Forest land. Exemption will support local communities that live, work, hunt, and fish in the Tongass.
100	LUD II Priority and Roadless protections should overlap to ensure the greatest restriction on road construction. One of the strongest combinations of protecting National Forest System lands from degradation is overlapping special area designations. These overlapping designations provide a complimentary framework for a high-level of protection from overuse and development of federal lands.

Appendix H Concern Nu	Appendix H Concern Text
101	The rationale for Alternative 6 as the proposed rule is not supported by the facts. The DEIS projects minimal beneficial effect on the forest product industry and thus does not support the assertion that eliminating the Roadless Rule will support rural economic development. The assertion that the Tongass should be managed locally ignores the Forest Service's 2001 conclusion that national rulemaking was needed to protect roadless areas. The DEIS recognizes that logging is most likely to be economically efficient in areas where there are already roads which is contrary to the assertion that opening roadless areas will result in more economic timber sales.
102	The NPRM provides no justification to support any additional exceptions. The 2001 Roadless Rule already provides for access to hydroelectric projects, construction of communication infrastructure, construction of transmission lines, access for locatable minerals, development of energy projects, and regional transportation projects. Although the 2001 Roadless Rule prohibits building roads for leasable minerals, the DEIS states there is no current or anticipated demand for leasable minerals on the Tongass.
103	Commenters perceived impropriety associated with how this proposed Alaska Roadless Rule came about between the Governor of the State of Alaska and the president. There was concern that the State's petition to initiate this rulemaking process was filed under false pretenses and did not involve any public scoping. Further, they are concerned that this change is motivated by politics and outdated timber-specific economics rather than being informed by the best available science.
104	Commenters were concerned that there was inadequate reasoning given for the selection of the preferred alternative in the DEIS, and that it was politically influenced, arbitrary and capricious. There was concern that selection of Alternative 6 as the preferred polarized the discussion, making nuanced conversation difficult.
105	The proposed rule is unlawful because it fails to provide a rational explanation for changing the Forest Service's roadless policy in the Tongass.
106	The effects disclosed in the DEIS are based on the premise that the proposed rule will fail because the proposal will not increase mining, development of leasable mineral, energy projects, infrastructure, timber output, and jobs.
107	Commenters expressed that including the Timber Priority LUD within the ARR boundary is confusing and inappropriate. They felt that timber production is incompatible with protecting roadless area values.
108	Commenters sought a baseline that includes an accurate accounting of roadless areas that still have roadless characteristics, rather than inventoried roadless areas.
109	Commenters were concerned that prior to the October 2019 DEIS release, the Forest Service deleted all young growth age-class data from their public portal, making it impossible for the public to consider the high-production of young growth timber.
110	There was concern that the DEIS did not use the most current roadless inventory. This would include roadless areas in the Keex' Kwaan traditional area that were not included in the 1996 inventory used as the basis for the 2001 Roadless Rule, specifically critical lands in Three-mile Arm, Seclusion Harbor, and No Name, Alvin, and Reid Bays. Commenters urged the Forest Service to update the 2001 Roadless Rule to apply it to all Tongass Inventoried Roadless Areas, particularly those important to Keex' Kwaan.
111	Commenters believed that the DEIS unlawfully postpones analysis of key impacts.
112	There was concern that deferring analyses of localized effects (community scale analyses) to subsequent site-specific proposals would place undue burden on local communities, particularly low income and marginalized communities that may lack resources necessary to conduct these analyses.
113	The DEIS does not recognize the environmental effects of potential road construction and reconstruction in non-development LUDs that may occur to access the development LUDs within roadless.

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114	Commenters expressed concern at the perception of a conflict between the Forest Service position that the proposed rule will not lead to more logging and the State of Alaska's petition, comments from Alaska's elected officials, and industry proponents demonstrating that the purpose of the proposed rule is to revitalize and expand the failing old-growth logging industry.
115	Commenters sought analysis of direct and indirect effects to the qualities of the Biosphere Reserve, particularly Glacier Bay National Park and Preserve – Admiralty Island.
116	Commenters questioned the effects disclosed for inventoried roadless areas with Developmental Land Use Designations (Development LUDs), and sought clarification that the alternatives identify both prohibitions and permissions for land use such as timber production and road construction.
117	The impact analysis fails to accurately identify differences among the range of alternatives and minimizes the impact of even the most extractive alternative. Such an approach grossly misrepresents the impact of the preferred alternative and ignores a key requirement under the National Environmental Policy Act. The lack of impact analysis sets a dangerous precedent for future proposed rulemakings impacting our public lands, parks and forests.
118	Commenters were concerned that the impacts analysis for alternatives was flawed because the basis for estimating volume of forest harvested and the assumed definition of "detrimental impacts" illustrated a misunderstanding of the local resources and ecosystems. For example, a geographic information system 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.
119	Comments sought additional discussion in the DEIS of logging industry impacts which can include poor culvert construction and maintenance, poor trash management, excess forest debris, and clear-cuts being left impassable for 30-50 years.
120	The DEIS is insufficient and misleading because it underreports or fails to disclose the many, potentially significant, environmental impacts of removing the Roadless Rule protections from the Tongass. This misrepresentation makes it impossible for the public and decision-makers to assess the exemption's adverse effects on the economy and ecosystems.
121	The Forest Service's proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests. The DEIS seems to disregard information in its impact analysis about impacts of clear-cutting old growth forests. This leads to DEIS conclusions that are in disagreement with the FEIS generated in 2000 when the Roadless Rule was created which clearly documented the negative cumulative impacts the Tongass would be subject to.
122	The Roadless Rule has been in effect on the Tongass for 20 years and removing it would cause adverse and irreparable harm.
123	Commenters expressed concern with effects analysis, saying that the definition of "old growth" is oversimplified and that by discussing effects in terms of acres of old- or second growth lost does not account for total roadless acreage impacted.
124	Commenters sought effects analysis, with more detail about the location and consideration of long-term secondary impacts, of natural resource extraction, including clear-cutting or development activities. Commenters further sought analysis showing the amount of forest fragmentation expected; documenting the amount of contiguous productive old growth and contiguous large tree old-growth currently remaining; and disclosing effects on maintaining viable, well distributed populations of yellow cedar. Commenters sought studies to determine harvest data, especially old-growth harvest data, for yellow cedar, detailed mapping of climate envelope maps for yellow cedar for the next 400 years, and analysis of range shifts

Appendix H Concern Nu	Appendix H Concern Text
125	Commenters sought information about adaptive risk management, including monitoring and mitigation, for all action alternatives.
126	Commenters said that using the same LUD categories for the action alternatives that are found in the Forest Plan would allow for better integration of the rule direction and plan components.
127	Commenters expressed concern that greater human access through additional road construction would lead to increased potential for invasion by pests such as hemlock woolly adelgid, emerald ash borer, and Douglas-fir beetle and other exotic invasive species and pathogens.
128	The only portion of the DEIS that discloses impacts in development LUDs within roadless areas is the outfitter/guide uses section which demonstrates the Forest Service could have provided more detailed analysis for every other resource.
129	Commenters sought effects analysis disclosing how the proposed rule will directly and indirectly impact ecosystem services in the region including economic cost and benefits related to impacts on ecosystem services. There was concern that exemption from the rule could lead to removal of trees and damage to ecosystems which can negatively impact ecosystem services.
130	Commenters expressed concern that exempting the Tongass from the Roadless Rule could lead to disturbance, development, or logging resulting in the damage or loss of ecosystem services in sensitive or pristine ecosystems including oxygen production, filtration of air, water and soil, as well as loss of fisheries and game populations.
131	Commenters expressed concern about the cost-benefit analysis using changes in suitable old-growth and young-growth acres as an indicator for potential displacement of recreationists interested in primitive recreation experiences. There was concern about the methodology used to measure adverse visitor impacts. Commenters also sought consideration of scenic values in the cost-benefit analysis. Commenters sought a full cost-benefit economic analysis that uses best available science to assess socioeconomic impacts of each alternative as well as analysis of the socioeconomic value and impact on fisheries, ecotourism, special use permits, recreation, game populations, and subsistence resources.
132	The recreation-related assessment provided in the separate Regulatory Impact Assessment and Cost-Benefit Assessment prepared for the Project (USDA Forest Service 2020) understates potential impacts to the visitor industry because it considers only changes in suitable timber acres and does not address indirect effects to adjacent areas. Timber harvest and road building activities have the potential to affect much larger areas than the area that is logged. Concern was expressed that the Forest Service did not analyze the corresponding effects on rural communities from the displacement of outfitters, guides, and tour operators.
133	Commenters seek to keep any profits from timber harvesting in the local economy.
134	There was concern that any economic benefit from exempting the Tongass National Forest from the Roadless Rule would not last long and would benefit only a small group of individuals and minority of industries while the long-term impacts would be substantial and negatively impact a larger group of individuals and a majority of industries.
135	Commenters requested that any profits made from logging should be paid back to taxpayers to relieve the federal deficit.
136	Commenters were concerned with the adequacy of economic analysis and whether the analysis incorporated the best available science. Further, there was concern that issues about economic analysis were brought forward during scoping but not adequately addressed in the DEIS.
137	Commenters asked that the EIS affected environment section include historical numbers (used in the Regulatory Impact Assessment) of timber harvest and road density during/through/after the temporary exemption period.
138	Commenters sought cost data for road building and maintenance (per mile) in the areas considered for exemption from the rule.

Appendix H Concern Nu	Appendix H Concern Text
139	Commenters sought comparison of respective socioeconomic contributions of timber sale purchasers and the visitor industry. They requested that analysis of effect include more current information and changes in assumptions to better consider the regional scale of the visitor industry.
140	Commenters expressed concern that exempting the Tongass from the Roadless Rule would cause economic harm to Southeast Alaska residents by threatening tourism, commercial fishing, sport fishing, and subsistence economies. They requested that these impacts be accounted for in the rulemaking process and countered with mitigation efforts. Commenters also noted that economic concerns extend to Washington State where the commercial fishing and cruise industries are directly affected by what occurs in Alaska.
141	Commenters were concerned that the action alternatives would not have an economic impact in terms of regional jobs/employment and would only benefit timber sale purchasers.
142	Commenters were concerned that opening more areas to logging would lead to an increase in timber sales that are not economically viable. Commenters questioned the need for changing the Roadless Rule considering examples of recent timber offerings that failed to sell and others that sold at a loss. Commenters expressed concern that changes to the Roadless Rule to allow logging access would not improve outcomes for a dying timber industry. Commenters indicated that any large-scale timber industry locally would be unsustainable, even if properly managed. There was concern about the industry's failure to modernize and innovate and most areas in the Tongass not being profitable for logging. Commenters said that small-scale logging practices would be more beneficial to local economies, that 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.
143	Commenters expressed that fishing and tourism industries should be supported over logging because those industries are sustainable and more important to the area economy. Commenters note that the existing Roadless Rule protects the environmental quality on which these industries rely.
144	Commenters said that tourism and outdoor recreation are major driving economic forces for the Alaskan economy and worth more than the timber industry (four times as many jobs in the state as oil & gas, mining & logging combined). Commenters are concerned that changes to the rule will impact recreation and tourism because currently, visitors travel to Alaska for pristine wilderness, clean air, water, wildlife habitat, scenic values and primitive and semi-primitive recreation opportunities. There is concern that these impacts will be experienced on 165,000 acres directly and thousands of acres indirectly plus more acres pending changes to the Forest Plan that would occur following a rule change.
145	Commenters were concerned that jobs provided by the tourism industry are insufficient to support local communities and, therefore, not a reason to consider keeping the Roadless Rule in place.
146	Commenters said that the ecotourism industry is not carbon neutral and that should be considered when weighing it against activities that may occur following a change to the Roadless Rule.
147	The tourism industry is projected to increase to over 2.4 million visitors to the area. The Forest Service is not ready for this increase, and no plan is in place to prepare for this increase. Large group sites and trails are underdeveloped, and the Forest Service must focus on preparing for an increase in tourism, rather than support logging.

Appendix H Concern Nu	Appendix H Concern Text
148	Commenters said that the local economy needs logging and fishing industries to grow and that a rule change would have a positive impact on growing those industries which would improve local economies. Even a small number of new 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.
149	Commenters sought agency support for rural economic development through supporting local fishing and tourism industries, investing in recreational infrastructure, and streamlining permitting processes for community projects.
150	There was concern that timber in the Tongass is primarily exported overseas to European and Asian countries. This helps other countries' economies while negatively impacting the Alaskan economy.
151	The NPRM states the proposed rule is a deregulatory action and would create an incremental reduction in the cost of conducting compliance reviews, thus reducing expenditure of taxpayer dollars. Neither the DEIS nor the NPRM attempt to quantify this potential reduction and reviews for projects in roadless areas do not impose a significant burden, as demonstrated by the 50 projects approved in roadless areas on the Tongass. In addition, the incremental saving for reviewing projects would be far outweighed by the additional expense taxpayers would incur from expanding the Tongass timber project into roadless areas. Commenters expressed concern that the Forest Service had not adequately evaluated the costs of this proposed rule, stating that the proposed rule has a total cost greater than zero, making it a "new regulatory action," not a "deregulatory action" under Executive Order 13771.
152	Commenters disagreed with the cumulative effects discussion about timber program decline over the past century, saying instead, that the timber industry has been sustainably operating and that the average market prices of Tongass timber have been rising.
153	Commenters were concerned that the DEIS did not quantify the reduction in expenses from exempting the Tongass from the Roadless Rule.
154	Commenters sought analysis showing potential financial returns from future projects involving opening roadless areas and actual return from timber including a full inventory of economically viable old growth timber.
155	Commenters disagreed with the assertion that the proposed rule would not increase agency costs because it would not increase timber harvest levels and sought a more comprehensive estimate of anticipated agency costs and losses from below-cost timber sales. The Regulatory Impact Assessment and DEIS violate NEPA by failing to account for significant costs to taxpayers as a result of-below cost Tongass timber sales.
156	Commenters wrote that timber sale projections used in the 2016 Forest Plan exceed the industry needs and that timber available for harvest with the Roadless Rule in place satisfies the current market demand. Commenters referred to recent research showing that merchantable volumes for sites open to timber harvests surpass past and future old-growth sale volumes.
157	Commenters expressed a concern that exempting the Tongass from the Roadless Rule may lead to more federal funds spent on timber subsidies and that losses incurred for administration of the timber program illustrate making more lands available to the program would not be prudent. Further, that high production costs and distance to market would make this timber unprofitable. Commenters wrote that reforming timber sale administration on the Forest prior to development of a rule would better align the agency's management priorities and responsibilities with the needs of the local and indigenous communities.

Appendix H Concern Nu	Appendix H Concern Text
158	Commenters expressed concern about the removal of trees and harm to the old-growth ecosystems that provide mental, spiritual, and physical well-being to people. Removal of old-growth trees and secondary development would result in degradation of the environment and loss of the wilderness that will not recover quickly, leading to spiritual and cultural loss for many generations. The negative mental, spiritual, and physical impacts resulting from loss of the old-growth forests would be magnified for those who witness it directly.
159	Commenters were concerned about negative impacts to the quality of the total environment and subsequent negative impacts to human health and well-being because the quality of the total environment (soil, air, water, and food) is intrinsically connected to human health and survival.
160	Because changes to Roadless Rule protections may lead to natural resource extraction and developmental activities, commenters expressed concern that cultural traditions would be affected, could stop and would not be taught to future generations.
161	Commenters expressed concern that 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.
162	Commenters expressed concerns that the EIS violates NHPA because cultural and historic resources exist within the project area and cultural surveys have not been conducted in coordination with Alaska Native Tribes.
163	Commenters said that environmental justice concerns for the proposed rule should be considered as effects on culture, not solely based on race designations.
164	There was concern that compliance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was insufficiently analyzed because Organized Village of Kake tribal citizens rely on the surrounding intact habitat provided by inventoried roadless areas for our food security, cultural practices and traditional way of life. Therefore, tribal communities would be disproportionately impacted by proposed regulatory changes which would be a potential violation of regulations concerning environmental justice.
165	Commenters were concerned that the impacts of climate change that would result from increased development authorized by a full exemption from the 2001 Roadless Rule stand to disproportionately affect minority communities, especially rural Alaska Natives communities in Southeast Alaska.
166	Commenters said that the Tongass National Forest is critical to Native Alaskans and the general southeastern Alaskan communities for various subsistence activities such fishing for salmon, hunting for moose, and foraging for wild foods. Low-income families require subsistence to keep a stable food supply.
167	Commenters sought site-specific information showing whether guided visitors are now using areas classified as "Roaded Natural" or other more developed settings and further effects analysis to describe the impacts of displacement and congestion on outfitter/guides. The outfitter/guide analysis is inadequate because it does not disclose the locations where future logging is likely to occur. Rather, the analysis simply shows the number of suitable acres added in large geographic areas.
168	Commenters provided opposing views about the impacts of logging on the tourism industry, some saying it does impact the industry and others saying it does not.
169	The outfitter/guide analysis is inadequate because it only assesses the impacts of acres considered suitable under the current Forest Plan and not all IRA acres that are in development LUDs and could be designated suitable for timber under future Forest Plan amendments

Appendix H Concern Nu	Appendix H Concern Text
170	Commenters were concerned with road access. Some expressed concern about the unmet need for access under the current rule, as well as seeking to get and retain public access to newly constructed roads built for timber sales and other projects. Commenters said that removing Roadless Rule protections would allow more roads to be built which would decrease traffic congestion and allow locals better access to hunting grounds. Others expressed concern that increased access would lead to resource degradation. Commenters were concerned that increased development of roads would lead to increased commercialization in the area.
171	Commenters opposed language in the exceptions under Alternatives 2 through 5 that would require the Responsible Official to decide whether a road is needed. Commenters consider this an unnecessary requirement that impedes development because the decision is made without any criteria and development projects are sufficiently regulated by meeting requirements for complex federal, state and local permitting, and complying with the Forest Plan and other requirements.
172	Commenters expressed concern that the DEIS understates the impacts because it does not recognize that shifting timber production from roaded areas to roadless areas would result in more road building, causing greater environmental impact.
173	Road building is not cost-effective and is a waste of taxpayer money, while damaging the fragile and unique forest.
174	Commenters expressed support for building additional roads.
175	Commenters said that additional access roads are not needed for timber harvests because the existing roads are sufficient.
176	Commenters expressed concern that the DEIS did not accurately describe the current limitations on the construction, operation, and maintenance of roads and utilities connecting the communities of Southeast Alaska.
177	Commenters sought a comparative summary format in Chapter 1 for Water Quantity and Quality, Air Quality, General Vegetation, General Wildlife Species/Habitat, and General Aquatics. The general discussion for impacts to Wetlands in Chapter I, Purpose and Need for the Action (p. 1-9), was suggested as an example of a comparative summary among the alternatives.
178	Commenters were concerned that maps did not provide an accurate picture of existing protections that cover much of the Tongass. As an example, maps did not clearly identify the various protective land use designations for the Tongass, such as areas designated as Wilderness, LUD II, and National Monument lands.
179	Commenters sought clarification on the process for subsequent NEPA analyses for future ground-disturbing activities and how future site-specific NEPA analyses relate to this EIS as well as the 2016 Forest Plan Final EIS. Commenters sought a graphic display, such as a flow chart, to better explain the process and the relationship to other NEPA documents.
180	Commenters sought a summary of the effects for each of the various impacts from the 2016 Forest Plan Amendment Final EIS to reduce the need for the reader to search for the summary findings in the 2016 Forest Plan Amendment Final EIS.
181	The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The Projected Timber Sale Quantity is insufficient to determine maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.
182	Commenters were concerned that the DEIS improperly relied on the 2016 Tongass Forest Plan Amendment EIS as an excuse for not disclosing environmental effects. For example, in the issues dismissed section the Forest Service dismisses soils, yet Alternative 6 opens the amount of land to "high hazard" soils to commercial logging by 38 percent but the DEIS denies that further analysis is needed.

Appendix H Concern Nu	Appendix H Concern Text
183	Comments suggested "remoteness" as defined in the EIS should be replaced with desired Recreation Opportunity Spectrum (ROS) descriptions and that the EIS should describe that, "Primitive, semi-primitive non-motorized, and semi-primitive motorized Recreation Opportunity Spectrum class settings have a natural or natural-appearing environment. These ROS settings are not suitable for timber production."
184	Commenters sought inclusion of effects analysis for the renewable energy sector; how would the proposed rule change the facilitation of renewable energy development including hydropower, geothermal, and wind.
185	Commenters were concerned with the lack of mention of the federal power site classification and Southeast Intertie, its authorization in the Public Law, and its support from the Southeastern Alaskan communities. Only Alternative 6 permits or recognizes the legal standing of the US federal power site classification on select hydropower resources. Commenters asked that the contradiction between Public Law 106-511, Title VI, and the Roadless Rule be addressed.
186	Commenters were concerned about long-term financial impacts from lack of access for maintaining transmission lines. Rights of way must be maintained and continually brushed and structures must be inspected on an annual basis.
187	Commenters sought effects analysis for mining projects that may occur following a rule change.
188	Commenters said that changing the Roadless Rule for mineral access is unnecessary as the Mining Act of 1872 ensures access to minerals, transportation, and energy development needs in the Tongass National Forest.
189	Commenters said that the 2001 Roadless Rule inhibits access to new leases for minerals, including geothermal resources, and that it inhibits mining and other mining related activities that are protected by U.S. mining laws. Discovering economic mineralization requires exploration to determine size and grade, which is not feasible without roads. The Roadless Rule also inhibits mining because it does not allow cutting and removal of trees associated with mining exploration and development. Exploration requires an ever-increasing level of investigation to add certainty to resource/reserve information to support financing in public markets
190	Natural resource extraction like mining is environmentally safe and has a small, temporary footprint. Regulations by permits require that mines including the roads, infrastructure and surface impacts are reclaimed upon the end of mine life.
191	Commenters sought keeping the Roadless Rule in place because exemption could lead to disturbances in sensitive habitat that would negatively impact both plant and animal communities and cause decreased biodiversity in the Tongass.
192	Commenters sought keeping the Roadless Rule intact to protect the old-growth habitats which provides sensitive habitat for over 30 endemic species.
193	Commenters were concerned that activities would accelerate mass extinction. Changes to Roadless Rule protections could lead to natural resource extraction and developmental activities, reducing the acreage of suitable undisturbed habitat for sensitive species. This loss of habitat would reduce population sizes of sensitive species and increase their risk of extinction.
194	Commenters were concerned that exempting the Tongass National Forest will lead to activities that would harm the survival of the Prince of Wales flying squirrel, both a keystone and indicator species that is endemic to the area.
195	Commenters were concerned that the proposed rule would violate the Endangered Species Act (ESA) for various ESA listed species such as the marbled murrelet, short tailed albatross, humpback whale, and Eskimo curlew. Commenters asked that the EIS identify all the listed species that may be present and affected in the action areas and questioned findings showing minimal consequences on the survival of the species as well as the lack of a biological assessment.

Appendix H Concern Nu	Appendix H Concern Text
196	The DEIS does not discuss the impact of environmental issues that it claims to address and instead references the 2016 Tongass Forest Plan Amendment EIS. The DEIS must be changed to discuss significant environmental impacts rather than simply incorporating them by reference. The majority of this DEIS relies on the biological assessments (BA) conducted by the National Marine Fisheries Service (NOAA) for the 2016 Forest Plan. However, the new Forest Service plan is fundamentally different to that introduced in 2016. The new plan aims to open areas for logging that will no longer be protected by the Roadless rule.
197	Commenters sought consideration of the science of the impacts of island ecology as key regions for sustaining the evolutionary processes related to diversification.
198	Commenters sought information on plans to restore or maintain the diversity of ecosystems and habitat types within the planning area including large-tree old growth and old-growth cedar stands.
199	There was concern about the adequacy of effects analysis for Old-growth Habitat. Commenters referred to the 'Old-growth Habitat Conservation Strategy' as outdated and were concerned that the DEIS does not consider the impact of high grading, habitat connectivity, climate change, and road effects. Determining the impact of exemption on old-growth trees requires mapping the quantity, age, and species of old-growth trees in the Tongass, taking inventory of champion trees, and preserving the genetics of old-growth trees. The DEIS also needs to consider and document the aerosols, pheromones, and chemicals that the oldest and largest trees of each species and subspecies of tree in the Tongass produce.
200	Commenters sought disclosure of deficiencies of the Old-growth Habitat Conservation Strategy for conserving goshawks.
201	There was concern that the temporal scales used in the DEIS rationale for maintaining viable, well-distributed wildlife populations are not correct for projecting the loss of old-growth habitat and its impact on species. The analyses refer to 100-year projections, yet it takes at least 250 years for Tongass forest lands to reflect characteristics of old-growth forest structure. The population viability analyses should include a time horizon of at least 250 years.
202	Commenters sought analysis of the effects of roads on air, light, sound, endangered species, wildlife, wildlife habitat, wildlife habitat connectivity and movement corridors within the project area as well as on and between nearby National Park Service (NPS)-managed lands. Commenters requested the analysis include impact to night skies, natural sounds, air quality, and landscape composition on NPS lands, as well as fish and the natural flow and character of waterways such as the Skagway River.
203	Commenters sought effects analysis for Alexander Archipelago wolves, that provides site-specific baseline information on impacts to wolf populations, survival and viability. Commenters were concerned with the effects analysis for wolf due to reduced deer habitat capability, road density, development, habitat fragmentation, den disturbance, and impacts to reproductive success. Commenters sought analysis of effects associated with how opening previously inaccessible acres to roadbuilding would increase wolf harvest from legal and illegal hunting and trapping.
204	Commenters sought cumulative effects analysis for bears and bear habitat associated with future logging or roadbuilding that could occur if areas were exempted from the Roadless Rule.
205	Commenters were concerned with analysis of the impacts on endemic terrestrial mammals (examples included ermine, flying squirrel, Pacific marten, and wolves) and the findings of a moderate to high probability of maintaining viable, well distributed wildlife populations for all species identified for the DEIS. Commenters questioned whether scientific rationale was used or scientific analyses beyond referral to the Habitat Conservation Strategy in the 2016 Tongass Plan. There was concern that many of the species, including endemic mammals and Management Indicator Species such as the American marten, illustrate declines on the Tongass since large-scale, industrial logging began in the 1950s.

Appendix H Concern Nu	Appendix H Concern Text
206	Commenters sought effects analysis for marbled murrelet.
207	Commenters sought effects analysis for road construction or other activities that would pose environmental risks to marine wildlife and marine habitat.
208	Commenters requested that the best available information be used in analyzing effects for Prince of Wales ermine.
209	Commenters sought cumulative effects analysis to determine if exemption threatens viability of the Queen Charlotte goshawk including location specific information showing where inventoried roadless areas provide habitat features for Queen Charlotte goshawk nest sites and foraging habitat, especially on Prince of Wales Island.
210	There was concern that 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.
211	Commenters sought separate effects analysis for two species of marten present on the Tongass National Forest due to one having an extremely limited range. American marten and Pacific marten are both found on the Tongass National Forest.
212	Commenters identified Sitka black-tailed deer as the most important land mammal species for traditional and customary use by indigenous peoples of Prince of Wales Island. Commenters were concerned that deer populations have already decreased due to environmental pressures such as timber harvest and development and because they expect changes to the Roadless Rule would lead to natural resource extraction and developmental activities, there was concern about adverse impacts and cumulative effects on deer habitat. Other respondents anticipated improved deer population numbers for hunters as outlined in the Quality Deer Management Association methods. Commenters sought effects and cumulative effects analysis for Sitka black-tailed deer and deer winter range including an evaluation of the size of deer populations in roadless areas, annual harvest of deer for subsistence, and the percent of deer using roadless areas versus those using previously harvested areas in the winter months. Commenters are concerned that removing roadless protections would negate the larger Tongass conservation strategy and that analysis is needed to either a) prove otherwise; b) conclude that the conservation strategy without roadless is adequate; or c) result in a change in program direction to fully ensure that there is a viable and robust population of Sitka black-tailed deer across the landscape that can survive winters with heavy snow. Area-specific requests were also made for inclusion within the analysis, which includes Duffield Peninsula. Concerns that old-growth timber harvest at higher elevations will create bottlenecks restricting movement of deer were expressed. Concerns that restrictions on altitudinal migration and movement will lead to starvation and death, negatively impacting total deer populations were expressed. Additionally, concerns were expressed about young-growth forests growing thicker and reducing sunlight to the understory. The reduced light source prevents vegetative growth in the understory that provides important food sources for deer. Commenters sought assessment of the stability of deer populations as a function of deer habitat and commented that the removal of lower elevation productive old-growth forest habitats is a key factor in determining the effects of an action on the species. Commenters sought analysis regarding the potential effects of the removal of essential deer habitat in areas where unfragmented habitat still exists. Commenters said that deer depend on old-growth forest habitat for foraging and refuge from severe weather. Commenters were concerned that deer populations have already decreased due to environmental pressures such as timber harvest and development. Commenters discussed effects of clear-cuts on deer habitat. There was concern about losses to deer populations
213	When road systems are connected to communities, commenters sought road density limits (no greater than 0.7 mile of open roads per square mile of forest) to reduce impacts associated with overharvest of important game and furbearing species in the area.

Appendix H Concern Nu	Appendix H Concern Text
214	There was an expectation that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities that would negatively impact the viability of apex predators, including bears, which are important for regulating populations of herbivores such as moose, elk, caribou and provide economic, social, and cultural benefits.
215	Commenters were concerned that the wildlife viability assessments conducted for the Forest Plan to determine viability risk for 30 endemic species had flaws with the calculations, which resulted in substantially underestimated viability risks for wildlife.
216	Commenters said that the Roadless Rule protects habitat for the Prince of Wales spruce grouse and the northern goshawk, which are environmentally and culturally important. There is concern that roadbuilding and development activities may decrease nesting and foraging habitat and increase mortality rates.
217	There was concern that natural resource extraction and development, that could occur throughout the Forest should there be an exemption to the rule, would fragment habitat and destroy landscape connectivity.
218	Commenters sought additional analysis on causes and impact of decreased biodiversity associated with the clear-cutting and timber industry activities that changing the Roadless Rule would allow, taking a wholistic view of the ecosystem and understanding the full cycle of ecosystem wellbeing and biodiversity as an invaluable resource. Commenters sought analysis of effects to the rainforest ecosystem that 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.
219	Commenters sought effects analysis considering habitat contiguity to provide refuge for wildlife impacted by climate change. Habitat connectivity facilitates wildlife adaptation by allowing wildlife to adjust their home ranges and movement patterns.
220	Commenters sought additional effects analysis considering the cumulative impacts of deforestation and climate change and changing the Roadless Rule on the existing and future declines for deer population and the required minimum deer population capabilities of existing ecosystems.
221	Commenters said that 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.
222	Commenters were concerned that removing Roadless Rule protections could lead to increases in human-wildlife conflict, threatening the well-being of humans and wildlife.
223	Roadless Rule protections could lead to natural resource extraction and developmental activities that resulting in displacement of wildlife and have detrimental effects on functional behaviors such as breeding and movement, that are essential for functional, healthy wildlife populations.
224	Commenters stated that wildlife use roads and may be affected by road development.
225	Commenters said that Roadless Rule protections helped maintain salmon populations which helps preserve the food source for bears, sustaining their population numbers.
226	Changes to Roadless Rule protections could lead to natural resource extraction and developmental activities resulting in activities that negatively impact rare and endangered species.
227	Commenters sought disclosure of how the agency would restore or maintain the diversity of ecosystems and habitat types within the area affected by the proposed changes to the Roadless Rule and that large-tree old growth be considered a distinct habitat type. Commenters described large-tree old growth and old-growth cedar stands as being at risk of being eliminated on northern Prince of Wales Island and other bio-geographic areas on the Tongass. There was concern that reductions in these forest communities would lead to a reduction in Sitka black-tailed deer populations and Alexander Archipelago wolf populations on Prince of Wales.

Appendix H Concern Nu	Appendix H Concern Text
228	The DEIS relies on outdated and inadequate monitoring data for goshawks and other wildlife in order to support its conclusions. The agency has not presented the limited wildlife survey data conducted in connection with timber sales or explain how these monitoring data have helped inform the DEIS.
229	The DEIS fails to rationally assess impacts to migratory birds.
230	The Forest Service must reinitiate ESA consultation before adopting the proposed rule. The Service cannot forgo additional consultation because the prediction that logging will not increase if roadless areas are opened to new development is unsubstantiated.
231	Commenters disagreed with DEIS findings and expressed concern about effects analysis for fish and the region's commercial, sport, subsistence and ursine fisheries. Commenters requested the use of more current baseline data, including consideration of climate change, in this analysis. Commenters sought analysis for anadromous fish streams, salmon (including coho and pink) habitat and survival. In analyzing effects for fish, commenters sought use of data that incudes current harvest data or information about project area salmon populations.
232	Because there was concern that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities, commenters sought consideration of effects to fish, Dungeness crabs, wetlands and watershed ecosystems including soil erosion and sedimentation, edge effects on windthrow or blowdown, mass erosion and channel erosion resulting from hydrologic changes caused by logging, the effects of roads altering hydrology and erosion processes, and alteration of groundwater temperature by logging. Commenters sought analysis of cumulative effects to salmon streams and salmonid habitat associated with future road system expansion. Commenters questioned the effectiveness of mitigations discussed in the DEIS.
233	There was concern that changes to Roadless Rule protections would lead to natural resource extraction and developmental activities that would accelerate acidification of water bodies; reducing the survival of calcifying species such as oysters, clams, corals, urchins, and certain phytoplankton which are food sources for humans and other wildlife. The loss of these species could have substantial consequences on the ecosystem structure, food systems, and subsequently negatively impact the economy.
234	The DEIS fails to substantively and accurately address fisheries and watershed effects, such as windthrow/blowdown, mass erosion, channel erosion, roads, erosion processes, alteration of groundwater temperature, post-logging fluvial erosion, gullying and channel expansion, and sedimentation. The assumption in the DEIS that road building and logging can occur in currently roadless watersheds with no risk to aquatic habitat and fisheries is not supported by available scientific literature. Commenters were concerned that impacts of the rule change on aquatic ecosystems (both freshwater and saltwater) are not adequately analyzed in the DEIS.
235	Concern was expressed that the DEIS fails to adequately assess the current status of fish and fish habitat on the Tongass, discuss how the current status relates to historic abundance, and to analyze how the proposed action will affect fisheries, fish habitat, and the important waters that support these resources. Underlying the DEIS and made explicit by various statements of Forest Service officials at public meetings, is the misguided belief that expanding logging and logging roads into roadless areas will have no effect on fish and fish habitat.
236	There was concern expressed that the analysis assumed that logging can occur in roadless areas without harm to fish resources.
237	Concern was expressed that the proposed plans have not designated what protections would occur in T77 Watersheds and TNC/Audubon Conservation Priority Areas relative to new road building. Also, that the proposed plan will result in significant entry into roadless areas to access adjacent timber that is not part of these protected watersheds.

Appendix H Concern Nu	Appendix H Concern Text
238	Commenters expressed concern that the DEIS analysis, which concluded that logging and road building in roadless areas would not have substantial adverse effects to soil, water quality, water quantity, and riparian conditions due to the implementation of current Forest Plan BMPs and other requirements is not valid. Concerns were related to the effects from logging and road building on high hazard soils, stream buffer effects on windthrow, effects of roads on hydrology and erosion, related effects to sediment in stream channels and stream channel stability, and upslope clearing effects to stream temperature.
239	Commenters noted that the DEIS did not include most recent status of Pink and Coho salmon numbers especially recent decreases in abundance.
240	Commenters noted that declines of pink salmon appear worse in the northern inside areas of Southeast Alaska and on Prince of Wales Island. There is concern that timber harvest in these areas is a major contributing factor.
241	Commenters noted that low harvest number of coho salmon in 2018 and 2019 may be related to timber harvest practices including a lack of buffers on small streams and culvert blockages of fish passages.
242	Commenters expressed concern that 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.
243	Commenters said that fish populations are already low in many fisheries and asked if fish populations completely disappear due to change in Roadless Rule, who would be responsible for replenishing fish stocks.
244	Because the region is prone to windthrow, commenters sought buffer zones 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 would expose more miles of important fish habitat to these destructive practices.
245	Concern was expressed that roadless areas supply unique areas for protection of fish and fish habitat and this was not properly assessed in the analysis in the DEIS. Areas with limited roads often have healthier fish resources.
246	Concern was expressed that pending DEISs on Prince of Wales Island that propose increased timber harvest, road building, and stream crossings have delayed final analysis until the Roadless Rule proposal is finalized. The concern is that these projects would greatly expand harvest into areas currently not accessible due to current Roadless Rule prohibitions and that if this rule is implemented these plans would then be finalized with these expansions included, which would damage fish and fish habitat.
247	Commenters expressed that the protected T77 Watersheds and TNC/Audubon Conservation Priority Areas watersheds are a small portion of the major fish producing watersheds on the Tongass and protections for these areas alone will not protect overall fish production in the Tongass and will also result in the concentration of fisheries in some areas and lack of fisheries in other areas.
248	Past analysis of roadless areas concluded that logging related practices have the risk of affecting fish habitat and fish populations. Current analysis cannot now be justified in saying that allowing harvest and related actions in these areas can now occur without adverse effects to fish. Also, the current analysis relies on the 2016 Forest Plan analysis that concluded actions could be taken and result in minimal harm to fish resources. This analysis cannot be used to justify the conclusion of no adverse effects to changes in the Roadless Rule. Some adverse effects would be expected with even the best planned or implemented actions.

Appendix H Concern Nu	Appendix H Concern Text
249	Commenters expressed that many existing barrier culverts in the Tongass have not been repaired and continue to block suitable fish habitat. Construction of more roads in currently roadless areas will add more barriers and add to the backlog of culverts that are not repaired reducing further available habitat. There was concern about the Forest's road maintenance backlog.
250	Commenters sought more full consideration of the effects of climate change in both the ocean and freshwater on salmon stocks. Commenters also noted that Roadless Areas may supply better fish habitat than other Tongass Forest areas after climate change effects occur.
251	Because changes to Roadless Rule protections may lead to natural resource extraction and developmental activities, commenters expressed concern about soil erosion and hydrology. This included concerns about effects such as landslides, river channelization, flow patterns, streamflow, snowmelt, wetlands, changing water chemistry, and flooding. Commenters were concerned that leaving unlogged riparian forests is insufficient to mitigate for the effects of upland logging on streams.
252	Commenters expressed concern that exempting the Tongass National Forest from the Roadless Rule may lead to the removal of trees which would impact air quality. Removing protections can lead to indirect effects that may increase air toxic emissions, further reducing air quality. Negative impacts to air quality from the removal of trees and secondary effects would exacerbate or worsen pre-existing conditions and disease risk. An increase in disease risk could lead to increases in health care costs, creating a reinforcing feedback loop where limitations to health care access further worsen health outcomes.
253	There was concern that exempting the Tongass National Forest from the Roadless Rule protections would lead to climate change and the subsequent long-term economic impacts of climate change would significantly outweigh any short-term economic benefits from natural resource extraction and development. Investing in the development of sustainable and innovative resource management can mitigate climate change effects, while providing jobs for Alaskans.
254	There was concern that developmental activities exacerbate climate change effects and will lead to communities being displaced.
255	Commenters were concerned that global loss of forests to deforestation and wildfires have made large intact forests increasingly rare. Exempting the Tongass National Forest can result in further loss in intact ecosystems that have global importance for sustaining life.
256	There was concern that exempting the Tongass National Forest from the Roadless Rule protections would lead to natural extraction and developmental activities that would exacerbate uncertain and extreme weather events that can have catastrophic consequences such as increases in the incidence of flooding, fires, drought, landslides, as well as intensified hurricanes. Increased incidence and severity of natural disasters can have profound economic and public safety consequences by putting human health, infrastructure, and natural resources at risk.
257	There was concern that exempting the Tongass National Forest from the Roadless Rule protections could lead to lead to developmental activities that increase the release of greenhouse gas emissions. Atmospheric concentrations of greenhouse gases (water vapor, nitrous oxide, carbon dioxide, methane, and chlorofluorocarbons) have changed with increases of emissions from human activities such as deforestation, burning of fossil fuels, production of energy, land use changes, landfill waste decomposition, as well as industrial and agricultural practices. Increases in these natural occurring greenhouse gases reinforce the trapping of heat from the Sun on Earth. Increases in temperature can create reinforcing feedback loops that can further increase greenhouse gases in the atmosphere, examples include increased water vaporization, demand for heating and cooling, as well as increased releases of methane and carbon dioxide from thawing ice stores and permafrost.

Appendix H Concern Nu	Appendix H Concern Text
258	Commenters said that by keeping the Roadless Rule protections in place, a considerable amount of carbon sequestration can occur that will contribute to climate change mitigation, while maintaining critical habitat. There was concern that exemption from the rule would lead to logging, in which case, the Forest would release considerable carbon reserves in addition to the loss of the carbon sequestration capabilities, contributing to the acceleration of climate change. Because old-growth trees sequester more carbon than new growth, the carbon sequestration capabilities cannot be recovered following logging on a time scale sufficient for the mitigation demand. Removal of trees and secondary development activities (logging, road construction, resource extraction) that damage the old-growth ecosystem will impact the capacity of other flora to sequester carbon. Climatic changes disrupt normal environmental parameters such as environmental fluid dynamics, ambient air temperature, water temperature, rainfall, and water acidity, which can have detrimental impacts on ecosystem services and natural resource availability.
259	Commenters were concerned about the impact of the carbon footprint from shipping timber overseas, asking that it be properly accounted for as an additional impact on climate change.
260	Commenters said that exempting Tongass National Forest from the Roadless Rule protections will lead to natural extraction and developmental activities that would accelerate climate change effects negatively impacting human health and survival.
261	Commenters sought effects analysis disclosing how the proposed rule change will directly and indirectly impact carbon stores and sequestration, as well as the resulting environmental and economic effects from climate change associated with the rule change. Commenters sought analysis of either the potential value of carbon storage on the Tongass or the socioeconomic costs of carbon emissions and associated climate effects. Commenters were concerned that there was a lack of analysis associated with increased road construction, logging, and mining with the comprehensive cumulative impacts that would 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.
262	Commenters disagreed that logging in the Tongass National Forest could lead to reductions of greenhouse gases
263	The DEIS inadequately analyzes and unlawfully discounts the proposed rule's potential climate impacts. The DEIS unlawfully discards in silence the Forest Service's earlier conclusions that logging on the Tongass can cause significant greenhouse gas emissions.
264	The Forest Service violated NEPA and NFMA requirements to use high quality, accurate, scientific information by failing to recognize the global importance of the Tongass for carbon storage; use of an inappropriate analysis scale to understate the value of the Tongass; and analyze that old growth forests in roadless areas store substantially more carbon than saw logs and young growth.
265	The DEIS failed to disclose the economic value of roadless areas of the Tongass on the carbon markets and the social cost of carbon emissions resulting from logging.
266	When the Forest Plan was originally developed it was based on the best available information; however, new information is available regarding the impacts of climate change on the area that should be incorporated into the Forest Plan.
267	The Forest Service failed to disclose and analyze the cumulative effects of expected climate change, road development, and logging on watersheds considered “safe havens”, refugia, or core areas for conservation of salmonid and other sensitive fish species. The analysis also fails adequately detail these areas importance to vulnerability and resilience on freshwater habitats and the fish populations’ dependent upon them.
268	Roadless Rule changes affect the opportunity, or lack, for renewable energy development (ex. Southeast Alaska Intertie) which has climate change impacts.

Appendix H Concern Nu	Appendix H Concern Text
269	Commenters sought expanded regulations to ensure that timber industries are restricted from logging in any old-growth and rainforest habitats.
270	Commenters sought more site-specific analyses.as they believe the assumption used in the DEIS for even distribution of logging is arbitrary and the EIS needs to make a reasonable projection of likely areas of logging. The Forest Service should provide this analysis based on VCUs.
271	Commenters said that virgin old growth forests may have future research potential and resources that could lead to new medicines and medical treatments.
272	The assumption that the Roadless Rule will not result in additional logging is arbitrary and capricious because the PTSQ is not a limitation on harvest as described in the DEIS and increased harvest is reasonably foreseeable. The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The PTSQ is insufficient to determine maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.
273	Commenters were concerned that the assumption that harvest levels would be equal across the action alternatives was flawed. The Forest Service fails to provide any support for its claim that the proposed rule will not increase logging in the Tongass.
274	The assumption that changing the Roadless Rule will not lead to changing the forest plan and, subsequently, subject more than 165,000 additional acres to logging is flawed.
275	Commenters expressed concern and sought effects analysis that considered the potential increased quantity of roads and acreage impacted to harvest the same amount of timber from young-growth, at 65 years of age, instead of waiting until the timber was at its maximum growth potential of 90–100. Commenters also sought information about reforestation plans for projects that may occur following an exemption to the rule.
276	Commenters provided input about logging practices in Alaska and logging in roadless areas. Some said that logging either enhances, or does not harm, watershed ecosystems and others expressed support for a second growth timber management strategy and still others were concerned with the sustainability of current harvest practices. There was concern that logging in roadless areas would impact a greater area and cost more than areas with roads and that logging old-growth also requires building more roads than logging young-growth. There was support for logging and forest treatment practices that are sustainable and protective of ecosystems and communities.
277	Commenters sought a discussion in the EIS considering young-growth as a sustainable supply when compared to old-growth and a productivity comparison of young- and old-growth.
278	Commenters were concerned about the cost and necessity of logging old-growth and intact forests when compared to the costs for other timber resources available for harvest that are more sustainable and cost efficient.
279	Commenters sought consideration for changing the roadless areas to Wilderness.
280	Commenters sought effects analysis for changes in roadless status of Tongass National Forest lands adjacent to National Park Service-managed wilderness and how they may affect wilderness qualities, viewshed, and visitor experience within the Glacier Bay National Park Wilderness.
281	Commenters expressed concern that the Forest Plan does not protect roadless area values in Development LUDs and that removing roadless area protections provided by the "not suitable for timber production" plan component would lead to degradation of unroaded area values.
282	Commenters were concerned that removing the Roadless Rule in Alaska could lead to the precedent of removing Roadless Rule protections in other areas which could lead to a precedent of excessive logging and road construction in forests across the United States.
283	Comment letters included introductory narrative and other information that was reviewed and noted with no further response required.

Appendix H Concern Nu	Appendix H Concern Text
284	Commenters expressed general opposition for logging in the Tongass and Chugach National Forests.
285	An assessment of Alaska's potential energy production contribution on NFS lands should be considered in the Roadless Rule issues under analysis since the rule does not adequately address other forms of renewable energy outside of hydropower and wind.

CARA Concern Number	CARA Concern Text				
138	In the Alaska Roadless Rulemaking process, it is clear that the legally required tribal consultation has been completely inadequate. The State of Alaska was granted $2 million to participate as a cooperating agency, while the tribal governments that participated in this capacity did not receive funds to pay the direct costs incurred. Tribal officials were not consulted early in the process of developing the proposed regulation; we were notified of the rulemaking process after the State of Alaska's petition had been granted. We have not seen a tribal summary impact statement and we assert that our concerns have been inadequately addressed. We supported a no-action alternative and were told that the preferred alternative would be a full exemption. Despite creating a regulatory change for issues related to tribal trust resources, the USDA did not use 'consensual mechanisms' for developing regulations; our concerns were not heard or reflected in the AKRR DEIS, our requests for government-to-government consultation were repeatedly denied and not responded to in a prompt or timely manner.				
148	On February 5th, 2019, HCA signed a Memorandum of Understanding with the United States Department of Agriculture, Forest Service (USDA Forest Service) in accordance with 40 CFR Section 1501.6 and 1508.5, and was established as a Cooperating Agency in the preparation of analysis and documentation under the National Environmental Policy Act (NEPA). On February 28, 2019, as a Cooperating Agency, HCA made comments on the Preliminary Draft Environmental Impact Statement. Between the PDEIS and the DEIS, the USDA Forest Service as the lead agency broke their trust with HCA as a Cooperating Agency. Suggestions for how to improve the analysis were not taken into consideration and community use area maps were not adjusted. Further, the spirit of compromise was abandoned when the U.S. Forest Service unilaterally decided to designate the full exemption alternative (Alternative 6) as the Preferred Alternative in the DEIS. Therefore, HCA prefers to make these current comments as a federally recognized Tribe, a sovereign nation in which the USDA Forest Service has a trust responsibility.				
32	Comments were received that were outside the scope of this project. These included position statements with no rationale, background and introductory statements.				
34	Commenters requested an extension on the comment period and express concerns that the public has not been given an adequate opportunity to comment.				
35	Commenters requested additional information regarding the proposed rule.				
97	Commenters cite a report that states the Forest Service illegally used funds congressionally appropriated for fires, to fund the development of the proposed rule. By making a $2 million grant to the State of Alaska to support the state's involvement in the Alaska roadless rulemaking process, the Forest Service illegally funded and controlled a Federal Advisory Committee. The Forest Service appears to have violated the Federal Advisory Committee Act by providing all the funding for a state-run advisory committee that was charged with developing alternatives for the Forest Service to consider in the Alaska Roadless Rule EIS.				
98	The Forest Service is not using the best available scientific information for this rulemaking. Given the inadequacy of the information and analyses contained in the DEIS regarding potential costs and benefits of the proposed action, we question whether the agency can satisfy its responsibilities under the E.O. 12866 to make a reasoned assessment of the need for the proposed action and the costs and benefits of the action. We question the reasonableness of the agency's conclusion that this regulatory action will be a `durable solution', promote economic growth, promote predictability and reduce uncertainty, or take into full account both the quantitative and qualitative costs and benefits of the action. Under agency planning regulations, the agency must document the basis for deciding that the information disclosed is the best available scientific information and "accurate, reliable, and relevant to the issues being considered." See 36 C.F.R. 219.3. The DEIS fails to meet these standards and the reasoning for the preferred alternative can be easily considered arbitrary and capricious.				
99	Forest Service stated in its notice of proposed rulemaking that the proposed Tongass National Forest Exemption is a deregulatory action under Executive Order 13771. The Forest Service stated that the proposed rule would create an incremental reduction in the cost of conducting compliance reviews of permissible projects proposed in designated inventoried roadless areas on the Tongass National Forest, thus reducing expenditure of taxpayer dollars. The Forest Service has not adequately evaluated the costs of this proposed rule. The proposed rule has a total cost greater than zero, making it a "new regulatory action," not a "deregulatory action" under E.O. 13771.				
48	The proposed rule recognizes the authority of the NFMA for rulemaking. However, the proposed rule and alternatives were prepared following processes that are inconsistent with the requirements of the land and resource management plans requirements of 16 U.S.C. 1604 parts (a), (c), (f), (g) and (k). A specific concern is the rule proposal to modify desired conditions and land suitability decisions without amending or revising the Forest Plan. This is a critical flaw, and with this flaw, I recommend that the proposed 36 CFR 294.50 rule be withdrawn from the rulemaking process.				
100	Exemption of the Tongass National Forest will violate the Endangered Species Act (ESA) for various ESA listed species such as the marbled murrelet, short tailed albatross, humpack whale, and eskimo curlew.				

CARA Concern Number	CARA Concern Text				
101	Commenters disagree with the Forest Service's conclusion in the DEIS that "[a]n ANILCA Section 810 evaluation and determination is not required for the Alaska Roadless Rulemaking because it is a programmatic level decision and not a determination whether to 'withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition.") This conclusion is even inconsistent with the other facts reported in the DEIS. The Region 10 Forest Service Handbook provides their Subsistence Management and Uses Handbook as FSH 2090.23, and Chapter 10 outlines the process for making an ANILCA Section 810, which includes an evaluation, a finding, notice and hearings, and finally a determination. ANILCA Section 810 requires Federal land management agencies to evaluate the effects of their proposed actions on subsistence uses and needs. Where an agency finds that its action may significantly restrict subsistence uses, it is prohibited from implementing that action prior to taking certain steps. Those steps include: giving notice to certain State, local, and regional entities (including regional councils); giving notice of and holding hearings in the vicinity of the area involved; and determining that (A) such a significant restriction if subsistence uses is necessary, (B) the proposed activity will involve the minimal amount of public lands necessary, and (C) reasonable steps will be taken to minimize adverse impacts on subsistence uses and resources. Because the finding was not made in the DEIS, the subsequent notice and hearings were out of order and therefore prevents the USDA Forest Service making a legal Section 810 Determination for Subsistence.				
49	The DEIS violates the National Historic Preservation Act (NHPA). Historic properties and significant cultural resources exist in the Tongass National Forest that may be eligible for inclusion on the National Historic Register. Yet it appears that the Forest Service has failed to meet its obligation to protect these resources under the NHPA by carrying out the Section 106 process in reasonable and good faith effort with relevant consulting parties. The Forest Service cannot meet its NHPA obligations unless it first conducts a cultural resource/historic property inventory in conjunction with the DEIS. It is not enough that such inventories will be completed on a site-specific basis as is currently proposed because it fails to illustrate the potential cumulative impacts to cultural resources and historic properties that would be seen in an overarching inventory.				
50	As reported by the Washington Post on August 28, 2019, the full exemption was chosen as the preferred alternative after President Trump instructed Secretary of Agriculture Sonny Perdue to select this alternative, as requested by Alaska Governor Mike Dunleavy. This political interference in the process is reflected by the inadequate reasoning given for the selection of the preferred alternative in the DEIS, which is arbitrary and capricious due to the Agency's failure to explain its reasoning in response to significant comments that were raised during the scoping process. Reported political interference from the highest levels of American Government in the Alaska Roadless Rulemaking process has evaporated the public trust and the social license of this endeavor, and it is clear that the Forest Service must restart the entire process in a transparent and equitable manner if it hopes to create any durable solution for management and conservation of inventoried roadless areas in the Tongass National Forest				
102	According to the DEIS and the Notice of Proposed Rulemaking, the Forest Service is proposing to change suitability designations in the Tongass Land Management Plan (TLMP) through an administrative change, a directive that the Forest Service recognizes differs from previous rulemaking proceedings. Specifically, the Forest Service claims that it can add 185,000 acres of IRAs to the Tongass National Forest's suitable timber harvest base without amending the TLMP. In doing so, the Forest Service asserts it does not have to adopt a plan amendment and conduct an environmental review process if the Tongass National Forest Supervisor provides notice of this administrative change concerning lands previously deemed unsuitable in the 2016 TLMP solely due to the application of the 2001 Roadless Rule. The Forest Service is attempting to take advantage of the 'administrative change' procedure in the 2012 Planning Rule, which can only be used to fix clerical errors, conform a plan to new statutory or regulatory requirements, or change the monitoring program or similar plan content. By using this administrative change procedure to reclassify vast tracts of pristine, old-growth forest to facilitate logging, the Forest Service proposal does not comply with the intent of the administrative change procedure.				102
103	The DEIS does not satisfy the requirements of NEPA and must be revised.				
104	For consistency and clarity, the EPA recommends that the Chugach National Forest is discussed more thoroughly in the EIS by moving the discussion in the Scope of the EIS on why the administrative boundary changes to the Chugach National Forest are being considered to the purpose and need discussion along with the discussion of what is included as part of the administrative actions that is listed in the alternatives discussion. In the scope of the EIS, we recommend that the location of the Chugach National Forest to the Tongass National Forest be discussed and a map of the Chugach National Forest be included.				
105	The disregard for incorporating the best available science, combined with providing no supporting economic analysis, undermines the validity of appropriate NEPA analysis. These economic issues were flagged in detailed scoping comments but were not addressed in the DEIS.				
106	Alternatives 2-6 make administrative changes to the 2016 TLMP timber designations which was not significantly raised during scoping period.				

CARA Concern Number	CARA Concern Text				
222	The proposed Alaska Roadless Rule exceeds the scope of the rulemaking and environmental impact statement that the Forest Service released following the mandatory scoping process. The draft rule now includes a provision to eliminate across-the-board protection for roadless areas on the Chugach National Forest, a proposal neither sought by the State of Alaska's petition nor disclosed by the Forest Service during the Notice of Intent nor during scoping. Vastly expanding the potential scope of the rule to include the 5.4 million acres of Chugach roadless areas requires the agency to conduct a new scoping process. The State of Alaska's 2018 petition to the Forest Service requested that the USDA promptly commence "a rulemaking proposing a rule to permanently exempt the Tongass National Forest from application of the Roadless Rule." The petition mentioned only the Tongass National Forest, not the Chugach. In addition, the Forest Service also prepared a PowerPoint presentation that introduced the public to the rulemaking and National Environmental Policy Act (NEPA) process that stated: "Chugach National Forest - currently outside area of focus."				
51	The Forest Service is moving forward with the proposed rule to accommodate natural resource extraction special interests advocated by industry and Alaska's government officials. This bias approach resulted in public scoping only after the rulemaking process had begun.				
108	There were insufficient public meetings in areas near the Chugach National Forest and the public meetings did not sufficiently address the impacts the proposed rule will have on the Chugach area. The Forest Service held public meetings in a dozen communities in or adjacent to the Tongass National Forest, but just one in a city close to the Chugach, in Anchorage.				
109	The Forest Service has ignored requests to extend public comment to 75 or 90 days and schedule public meetings in the lower 48 states. Requests for additional public hearings have been ignored. The State of Washington expressed concern that their economy will be impacted by this proposed rule and requests for public hearings in Washington were ignored. As a result, many organizations participated in a community public meeting held in Seattle on November 23 that provided what the Forest Service would not - an opportunity for community input here in Washington State on the importance of protections for Tongass National Forest roadless areas that are managed for all Americans				
52	The public engagement process for this action has not been satisfactory. Public participation is a crucial part of agency decision making. Federal agencies are bound by 40 CFR. §1506.6(a) of the CEQ rules to "make diligent efforts" to include the public in the NEPA process, and by 40 CFR §1503.1(a)(4) to request comments from the public. Public engagement is a unique right of individuals within a democracy to engage with their government. Thorough public engagement processes improve decisions by ensuring diverse viewpoints are considered and help build the public's trust in government institutions by incorporating public values into decisions. Soliciting feedback from the public is therefore a necessary part of good decision making.				
110	The purpose and need description does not contemplate changes to TLMP, this was not an issue significantly raised during scoping, and is not an issue that has been adequately noticed during the public comment period for the DEIS.				
111	The Forest Service provides no rational basis for adopting the Chugach proposed modifications provision.				
53	The purpose and need description for the proposed rule is insufficient for exempting the Tongass National Forest. A clear and full statement of purpose and need is critical since it is the foundation for the formulation, evaluation, and comparison of alternatives. The statements of purpose and need for the ARR must be amended to clarify the purpose and need of the regulations for addressing key issues				
112	DEIS states that the purpose and need is to resolve controversy with regards to managing roadless areas. Exempting 9.2 million acres of inventoried roadless acres and converting 165,000 old-growth acres and 20,000 young-growth acres previously identified as unsuitable timber lands to suitable timber lands in the Tongass National Forest will create controversy. Facilitating roadbuilding, logging, log rafting, log transfer facilities, stream degradation, salmonid impediment, benthic degradation and carbon release will create controversy. As such, the preferred alternative does not adequately meet the purpose and need description.				
90	The Forest Service takes the position that the proposed rule will not lead to more logging, when the state's petition, comments from Alaska's elected officials and industry proponents clearly demonstrate that the purpose of the proposed rule is to revitalize and expand the failing old-growth logging industry. The old-growth logging industry has already cut nearly all the economically viable forest it has access to in the Tongass and must expand into new roadless areas if it is to continue.				
113	Alternative 6 does not meet the purpose and need statement in the DEIS, which calls for a "long-term, durable approach to roadless area management … that accommodates the unique biological, social, and economic situation found in and around the Tongass." Exempting the Tongass National Forest will allow for activities inconsistent with the goal of meaningfully addressing roadless area conservation needs as stated in the purpose and need statement found in the DEIS.				

CARA Concern Number	CARA Concern Text				
114	The Forest Service states the 2019 proposed rule was contemplated and rejected by the agency when promulgating the 2001 Roadless Rule. As a result, the agency must explain why the rationale for rejecting the Tongass exempt alternative in 2001 rests on fact patterns or conditions that have changed now in 2019. However, the Forest Service fails to do this, and even explicitly denies that there were any changed conditions that brought about the 2003 Tongass exemption rulemaking. Instead, the Forest Service provides as a rationale that it has a "different policy perspective on the roadless policy question" in 2019. It lists general policy priorities (rural prosperity, competing economic interests, environmental tradeoffs) that all existed at the time the 2001 Roadless Rule was established, and does not provide a concrete rationale for the change in conditions that would allow an agency to pivot away from what it had promised to the public that it would do. The receipt of a petition from the State of Alaska does not in and of itself equate to a change in conditions, any more than the various court rulings discussed. The Forest Service must provide its own explanation and rationale as to what change in conditions from 2001 to 2019 merit a change in its decision on whether to reject or accept the Tongass exempt alternative. This rationale must be more than an arbitrary or capricious rationale, in consideration of the substantial reliance interests of the American public that were created by previous Forest Service actions and declarations.				
115	Keeping the Roadless Rule intact (Alternative 1) best addresses the three key issues identified in the DEIS: 1) roadless area conservation; 2) to support local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors; and, 3) conserve terrestrial habitat, aquatic habitat, and biological diversity. Furthermore, the DEIS acknowledges that Alternative 1 "would protect the most acres and existing management direction would provide the highest degree of protection, with the existing general prohibitions remaining in place."				
116	The general discussion for impacts to Wetlands in Chapter I, Purpose and Need for the Action (p. 1-9), provides a good example of a comparative summary among the alternatives. The EPA recommends the USFS use a comparative summary format similar to the Wetlands section for the following sections in Chapter 1: Water Quantity and Quality, Air Quality, General Vegetation, General Wildlife Species/Habitat, and General Aquatics.				
219	The impact analysis fails to accurately identify differences among the range of alternatives and minimizes the impact of even the most extractive alternative. Such an approach grossly misrepresents the impact of the preferred alternative and ignores a key requirement under the National Environmental Policy Act. The lack of impact analysis sets a dangerous precedent for future proposed rulemakings impacting our public lands, parks and forests.				
118	The DEIS violates NEPA because it does not present a range of reasonable alternatives. The alternatives presented were contradictory with arbitrary differences in roadless acreage and logging. The DEIS should have included an alternative that updates the roadless inventory to include all roadless areas that were not included as inventoried roadless areas under the 2001 Roadless Rule. The DEIS also should have included an alternative providing the Tribal Nations with a more meaningful role in management decisions affecting land in Tongass within their traditional territory.				
119	Commenters expressed concern that the Forest Service never truly considered any of the other action alternative. Alternative 2 was only added to the DEIS to provide a false narrative that the Forest Service considered an alternative that would expand protections of roadless areas, when the alternative was never truly considered. The current administration and Alaska state officials have arbitrarily predetermined the outcome of the rulemaking to exempt the Roadless Rule. Concern regarding the use of tax-payer monies to move forward on a proposed rule that is not in the interest of the public.				
120	The EPA recommends the USFS provide clarification on the process for subsequent NEPA analyses for future ground-disturbing activities and how future site-specific NEPA analyses relate to this EIS as well as the 2016 Forest Plan Final EIS. In addition, the EPA recommends the final EIS include a flow chart to better explain the process and the relationship to other NEPA documents.				
121	The Regulatory Impact Assessment (RIA) relied on data that detailed the historical numbers of the timber harvest and road density during the temporary exemption period through the period after the exemption was lifted. This historical data was not included in the draft EIS. The EPA recommends the USFS include this data in the affected environment section in the EIS for consistency and completeness.				
122	The Forest Service's failure to use the most updated roadless inventory data for this rulemaking is of concern. Importantly, the updated inventory would include roadless areas in the Keex' Kwaan traditional area that were not included in the 1996 inventory used as the basis for the 2001 Roadless Rule, specifically critical lands in Three mile Arm, Seclusion Harbor, and No Name, Alvin, and Reid Bays. We also urge the Forest Service to update the existing National Roadless Rule to apply to all Tongass Inventoried Roadless Areas, particularly those important to Keex' Kwaan.				
71	The DEIS relies on the 2016 Forest Plan FEIS to assess baseline conditions for salmon. That FEIS considered harvest data through 2013. Since that time, pink populations plummeted. More up-to-date pink salmon population data needs to be incorporated into the DEIS				
123	The Langdon and Sanderson (2009) publication should be used as a resource which defines the K'iis Xaadas territory that the Alaska Roadless Rule DEIS uses in both Appendix E pages E-32 to E-34 and Appendix F pages F-1 and F-2. Table E-12 of the DEIS should reflect the corrected traditional territory. HCA understands that this area may be smaller than the "Community Use Area" currently defined in the DEIS, however the K'iis Xaadas traditional territory is more widely recognized and is still the currently recognized traditional use area for Hydaburg.				
124	The K'iis Xaadas have an intimate knowledge of the land in which they occupy. The subsistence economy for residents of Hydaburg is strong, and the reliance upon fishing, hunting and gathering takes an understanding of the available habitat and environment throughout the territory. This traditional knowledge is not incorporated at any level in the DEIS.				
125	The DEIS fails to quantify the reduction in expenses from exempting the Tongass from the Roadless Rule.				

CARA Concern Number	CARA Concern Text				
126	The DEIS should include an analysis on the affect the proposed rule will have on the renewable energy sector. Specially, how will the proposed rule change the facilitation of renewable energy development including hydropower, geothermal, and wind.				
127	The Forest Service is required to provide site-specific analysis for the locations where logging will have effects. The Forest Service must issue a revised EIS that bases its analysis of effects on projections of likely areas of logging, not on the assumption that logging will be evenly distributed across the forest.				
128	The temporal scales used in the DEIS rationale for maintaining viable, well-distributed wildlife populations are not correct for projecting the loss of old-growth habitat and its impact on species. The analyses refer to 100-year projections, yet it takes at least 250 years for Tongass forest lands to reflect characteristics of old-growth forest structure. The population viability analyses should include a time horizon of at least 250 years.				
129	The DEIS is insufficient and misleading because it underreports or fails to disclose the many, potentially significant, environmental impacts of the removing Roadless Rule protections from the Tongass. This misrepresentation makes it impossible for the public and decision-makers to assess the exemption's adverse effects on the economy and ecosystems. The Forest Service's proposal for exemption and claim that it will not cause direct harm, without explanation, contradicts its own findings from 2001 that logging, development, and roads have direct correlations with harm to National Forests.				
130	The DEIS relies on the outdated 'Old-growth Habitat Conservation Strategy' to determine the impact to old-growth habitat. The DEIS does not consider the impact of high grading, selectively cutting the largest trees, which decreases habitat value and decrease biodiversity. Determining the impact of exemption on old-growth trees requires mapping the quantity, age, and species of old-growth trees in the Tongass, taking inventory of champion trees, and preserving the genetics of old-growth trees. The DEIS also needs to consider and document the aerosols, pheromones, and chemicals that the oldest and largest trees of each species and subspecies of tree in the Tongass produce.				
131	The Forest Service's failure to consider information about the negative effects of roads on habitat and wildlife violates NEPA. Roads are a significant stressor to wildlife. Roads negatively impact wildlife through noise and air pollution, wildlife-vehicle collisions, and introduction of invasive species. Connectivity between populations of island endemics is particularly important for the maintenance of viable, well-distributed populations.				
132	The DEIS does an inadequate job of analyzing the effects of roadbuilding on subsistence resources. The DEIS states "The analysis of the likely effects of the DEIS alternatives on subsistence resources and uses is presented in two parts. Effects on subsistence resources and uses important to each rural community are discussed individually by community in Appendix E" (page 3-223). In Appendix E, Subsistence is discussed on page E-15 and does not discuss any individual community. Individual Community Assessments start on the bottom of page E-15 and do not discuss impacts to subsistence (although there is mention of customary and traditional use for the alternatives with a Timber Priority). Back on page 3-223, the second part of the subsistence analysis "provides a Forest-wide evaluation that assesses the three factors related to subsistence uses identified by ANILCA" (page 3-223). The analysis relies heavily on the 1997 Forest Plan Revision FEIS, because "The 2016 Forest Plan EIS found that the possibility of a significant restriction, resulting from a change in abundance or distribution, would be less than the possibility under the 1997 Forest Plan or 2008 Forest Plan for all the alternatives considered…" (page 3-224). The rest of the Alaska Roadless Rule DEIS analysis for subsistence seems to rely on the 1997 Forest Plan Revision FEIS, for "abundance and distribution", "access", "competition" and "cumulative effects". HCA believe this does not take into consideration that the data used for the 1997 Forest Plan Revision FEIS was 22 years ago. While the analysis for the 1997 Forest Plan came out more conservative than the 2016 Forest Plan, this does not mean using any analysis for other Plans is appropriate. For both parts of the subsistence analysis sections (Chapter 3 and Appendix E), HCA recommends using current data (for instance Hydaburg's harvest data taken and reported by the State of Alaska was updated in 2012).				
133	Given how important salmon and salmon habitat is to indigenous communities and Alaska's economy, the analysis would benefit from a closer look at where timber harvest could occur with respect to anadromous fish streams. Under Alternative 6, the number of anadromous salmon stream miles that would be exposed to roadbuilding activities significantly increases from the number of miles that are protected under the current 2001 Roadless Rule (Alternative 1).				
54	The DEIS ignores or underestimates the environmental impacts on inventoried roadless areas with Developmental Land Use Designations (Development LUDs). The DEIS should be amended to clarify that the alternatives identify both prohibitions and permissions for land use such as timber production and road construction				
55	The DEIS did not address the issues associated with landless and marine traffic issues.				
135	The cost-benefit analysis arbitrarily omits scenic values. A primary purpose of NEPA is to "assure for all Americans ... esthetically and culturally pleasing surroundings" and agencies must incorporate "the environmental design arts in planning and in decision-making."				
137	The Forest Service needs to do a full cost-benefit analysis to assess the socioeconomic impact of all the alternatives in the DEIS. Additionally, commenters request analysis of the socioeconomic value and impact on fisheries, ecotourism, special use permits, recreation, game populations, and subsistence resources.				
139	Commenters request the Forest Service provide the cost of roadbuilding upon exemption. It is expected that the costs of building roads in these areas would be substantial, especially considering that all the economical timber has been cut. We request that the costs per mile of building and maintaining roads in these areas are analyzed and released to the public.				
92	Commenters ask the Forest Service to include an analysis of the impacts the proposed rule will have on wildlife and endangered species.				

CARA Concern Number	CARA Concern Text				
93	The Tongass Roadless Rule DEIS is lacking a credible economic analysis and falls well short of appropriate NEPA economic requirements. In the DEIS, USDA has ignored the best available economic science, which clearly illustrates that from almost every economic angle, the U.S. and southeast Alaskans are better off keeping the Roadless Rule intact. Not only has USDA ignored the best available science, they also did not provide any economic analysis to show how exempting the Roadless Rule on the Tongass would help Alaska or the nation. The disregard for incorporating the best available science, combined with providing no supporting economic analysis, undermines the validity of appropriate NEPA analysis. The DEIS does not analyze corresponding effects on the visitor industry or rural communities.				
56	The DEIS and proposed rule fails to adhere to federal environmental laws. This undermines the credibility of the DEIS and weakens the proposal overall. The Forest Service is supposed to have identified listed species may be present and affected in the action areas. Not only did they not do this, but they listed some of the species present in the area and claimed that their actions would have minimal consequences on the survival of the species without even conducting a biological assessment. Issues such as these are exemplified across the entire EIS, ultimately affecting the proposals credibility on environmental issues.				
141	The Forest Service needs to provide more information as well as commit to monitoring and mitigation in terms of adaptive risk management for all action alternatives in the DEIS.				
143	A cultural resources survey is needed in the DEIS in collaboration with Alaska Native Tribes to assess the impacts the rulemaking could have on cultural resources within the Tongass to satisfy NEPA requirements.				
145	Commenters requested an analysis showing potential financial returns from opening roadless areas and actual return from timber in these areas. A full inventory of economically viable old growth timber needs to be conducted. The results of these analyses need to be disclosed.				
149	The DEIS fails to show how the proposed rule will be beneficial for the socioeconomic welfare of Alaskans.				
150	Inadequate analyses were conducted to determine how the proposed rule will directly and indirectly impact ecosystem services in the region. Economic cost and benefits related to impacts on ecosystem services needs to be analyzed.				
153	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. Since the DEIS does not include an analysis of either the potential value of carbon storage on the Tongass or the socioeconomic costs of carbon emissions and associated climate effects, it does not allow the public or decision makers to evaluate these economic tradeoffs and therefore violates NEPA. These analyses need to be undertaken.				
160	The DEIS failed to analyze impacts to habitat contiguity important for wildlife impacted by climate change. The DEIS fails to acknowledge the importance of habitat connectivity as the best strategy to allow wildlife to adapt in the face of climate change. Habitat connectivity facilitates wildlife adaptation by allowing wildlife to adjust their home ranges and movement patterns.				
162	The DEIS fails to quantify the amount of forest fragmentation that will result from removing the Roadless Rule protections. The DEIS failed to document the amount of contiguous productive old-growth and contiguous large tree old-growth currently remaining.				
163	Inadequate analyses were conducted to determine how the proposed rule change will directly and indirectly impact subsistence users and harvesters in the Tongass National Forest. Commenters express that the DEIS includes out-of-date subsistence data references that need to be updated. The DEIS also fails to account for changes in subsistence distribution resulting from climate change effects. The Forest Service needs to consider specific measures to mitigate the effects of the proposal on subsistence use on traditional use areas, including protecting all the remaining productive, intact, old-growth habitat in Tribal Nation's traditional use area, updating the Tongass roadless inventory to capture all roadless lands important to Tribal Nations.				
164	The DEIS contains taxonomic errors for the pine marten (*Martes americana*). Contrary to the analysis in the DEIS, other Forest Service documents (e.g. Central Tongass Project) and best available science, recognize that there are two species of marten are present on the Tongass National Forest and one species has an extremely limited range. American marten (*Martes americana*) and Pacific marten (*Martes caurina*) are both found on the Tongass National Forest.				
165	The DEIS failed to provide a detailed analysis of impacts to Sitka black-tailed deer and deer winter range. Commenters request analysis evaluating the size of deer populations in roadless areas, annual harvest of deer for subsistence, and the percent of deer using roadless areas versus those using previously harvested areas in the winter months. Commenters are concerned that removing roadless protections would negate the larger Tongass conservation strategy and that analysis is needed to either a) prove otherwise, b) conclude that the conservation strategy without roadless is adequate, or c) result in a change in program direction to fully ensure that there is a viable and robust population of Sitka Black-Tailed deer across the landscape that can survive winters with heavy snow. Area-specific requests were also made for inclusion within the analysis, which includes Duffield Peninsula. Concerns that old-growth timber harvest at higher elevations will create bottlenecks that restrict movement of deer were expressed. Concerns that restrictions on altitudinal migration and movement will lead to starvation and death, negatively impacting total deer populations were expressed. Additionally, concerns were expressed about young-growth forests growing thicker and reducing sunlight to the understory. The reduced light source prevents vegetative growth in the understory that provides important food sources for deer.				

CARA Concern Number	CARA Concern Text				
166	The DEIS has deficient analysis of impacts to Alexander archipelago wolves because it does not provide site-specific baseline information on impacts to wolf populations as required under NEPA, NFMA, and the Forest Plan. The DEIS minimizes the risks of exemption to the wolf population due to reduced deer habitat capability, road density, habitat fragmentation, den disturbance and impacts to reproductive success. The DEIS also fails to assess how opening previously inaccessible acres to roadbuilding will increase wolf harvest from legal and illegal hunting and trapping.				
167	The DEIS lacks cumulative effects analysis to determine if exemption threatens viability of the Queen Charlotte goshawk. This will require location specific information showing where inventoried roadless areas provide habitat features for Queen Charlotte goshawk nest sites and foraging habitat, especially on Prince of Wales Island. The DEIS does not acknowledge deficiencies of the Old-growth Habitat Conservation Strategy for conserving goshawks.				
169	The DEIS fails to sufficiently analyze the impacts of the proposed rule on the marbled murrelet.				
171	The DEIS fails to assess the reasonably foreseeable impacts to black bears, brown bears and bear habitat from the proposed action. Those impacts include reductions to prime bear habitat that would not otherwise be possible. The EIS must disclose and discuss the impacts to bears and their key habitats of eliminating the Roadless Rule and making significant amounts of prime bear habitat available for logging and roadbuilding.				
173	The DEIS fails to account for the best available information for Prince of Wales ermine. As a result, the Forest Service has failed to adequately assess the impacts of lost Roadless Areas on Prince of Wales for this species. Ongoing work on the Prince of Wales ermine highlights the distinct evolutionary origin and unique genetic properties of this mammal that, to the best of our knowledge, is only found on Prince of Wales Island, and potentially a very few nearby islands (not yet fully assessed).				
192	The EIS should determine how changes in the roadless status of Tongass National Forest will directly and indirectly impact the qualities of the Biosphere Reserve, particularly Glacier Bay National Park and Preserve - Admiralty Island.				
175	The EIS should examine how changes in roadless status of Tongass National Forest will directly and indirectly impact wildlife populations in adjacent National Park Service-managed lands. The shared boundary has areas of potential wildlife connectivity and movement corridors between TNF and NPS land.				
176	The EIS should determine how changes in roadless status of Tongass National Forest will contribute to air, light, and sound pollution in adjacent National Park Service-managed land. This includes the impact to night skies, natural sounds, air quality, and landscape composition on NPS lands, as well as fish and the natural flow and character of waterways such as the Skagway River, among others, should be considered in the EIS.				
178	The Forest Service failed to disclose and analyze significant information about the effects of the proposed rule on fish and watersheds. Leaving unlogged riparian forests is insufficient to mitigate for the effects of upland logging on streams, contrary to the implications in the DEIS. The DEIS arbitrarily and capriciously dismisses, and fails to substantively and accurately address, the environmental effects including edge effects on windthrow or blowdown, mass erosion and channel erosion resulting from hydrologic changes caused by logging, the effects of roads altering hydrology and erosion processes, and alteration of groundwater temperature by logging. The DEIS utterly fails to explain how road system expansion will not be associated with more widespread impacts of salmon streams and more extensive deterioration of high-quality salmonid habitat.				
57	The DEIS for this rulemaking improperly relies on outdated data from the 2016 Forest Plan FEIS to assess impacts to the region's commercial, sport, subsistence and ursine fisheries. The failure to provide updated information about the region's salmon fisheries is a major flaw with the DEIS. The DEIS also lacks baseline conditions, omitting any current harvest data or information about project area salmon populations.				
58	The DEIS fails to access the impact the proposed rule change will have on coho salmon habitat and survival.				
59	The DEIS provide a detailed analysis of barrier culverts in southeast Alaska and acknowledges that fish passage obstructions cause "indirect" effects to fish. However, the DEIS failed to discuss the current number of blocked culverts, number of stream miles impacted, and the average number of blocked culverts addressed each year. The absence of barrier culverts and stream crossings from inventoried roadless areas is another distinctive habitat feature that makes the impacts of this rulemaking different from impacts predicted under the 2016 Forest Plan FEIS. Because barrier culverts block access to habitat entirely, barrier removal is frequently the most effective recovery measure (and often the measure with the most immediate positive impact) when compared with other habitat recovery efforts, such as reforestation, repairing stream-straightening or channelization, or increasing flows. The Forest Service's refusal to fix existing barrier culverts reduces salmon productivity with real costs to commercial fishermen. The DEIS and cost-benefit analysis arbitrarily ignore these costs.				
179	The DEIS analysis should identify where on the landscape the expected changes to timber harvest and roadbuilding will occur with respect to the resources that are important to communities. Mapping this out on a smaller scale (i.e. traditional territory, USDA Forest Service Ranger District, Biogeographical Province) would benefit the analysis and truly show the differences between the range of alternatives and their impacts on key issues and resources.				
60	The DEIS fails to recognize that tourism access commonly concentrates in areas designated, but not currently used for timber. Currently, many timber management areas are in roadless status, which provides tourism companies with predictable and consistent land use. A critical missing piece from the DEIS is site-specific information showing whether guided visitors are now using areas classified as " Roaded Natural" or other more developed settings and whether timber sale activities would displace them. The DEIS and cost-benefit Analysis fail to adequately describe the impacts of displacement and congestion on tour operators.				

CARA Concern Number	CARA Concern Text				
61	The DEIS improperly defers analysis of adverse impacts to outfitter/guides and the guided public. The DEIS erroneously measures the impact of logging on recreation across the entire Tongass National Forest rather than across specific area combinations used by operators and visitors. Another significant error is the Forest Service's cost-benefit analysis used changes in suitable old-growth and young-growth acres as an indicator for potential displacement of recreationists interested in primitive recreation experiences. The methodology used to measure adverse visitor impacts is wrong. NEPA requires that agencies ensure the professional and scientific integrity of cost-benefit analyses. An EIS fails this standard when it relies on misleading economic assumptions.				
180	The DEIS fails to mention the impact of removing Roadless Rule protections on yellow cedar (*Callitropsis nootkatensis*). Yellow cedar is an important economic and cultural tree species across the Tongass. Despite compelling evidence of the fragility of yellow cedars in the Tongass in the face of threats including climate change and logging, the U.S. Fish and Wildlife Service recently denied a petition was submitted requesting that the species be listed under the Endangered Species Act. A significant portion of yellow cedar range occurs in roadless areas on the Tongass National Forest, and therefore, an adequate analysis of maintaining viable, well-distributed populations of Yellow cedar should be done before any conclusions can be made about the persistence of the species. The USFS needs to conduct studies to determine harvest data especially old-growth harvest data for yellow cedar, create a detailed map of climate envelope maps for yellow cedar for the next 400 years, and analyze range shifts.				
181	The Tongass is an island archipelago and, as such, it is highly susceptible to a host of impacts to wildlife that are amplified in island systems. In addition to loss of habitat and fragmentation, greater human access through additional road construction often means increased potential for invasion by exotic invasive species and pathogens.				
62	The DEIS fails to consider the impacts that mining activities will have on the area.				
184	No analyses were undertaken that demonstrate there is a need for additional timber harvest in the area. The DEIS relies on unsupported assumptions about regional dependency, particularly rural economies, on large federal timber sales. Additionally, logging in roadless areas will impact a greater area and cost more than areas with roads. Logging old-growth also requires building more roads than logging young-growth.				
63	The DEIS should have analyzed the impacts of prematurely harvesting young-growth timber, as it proposes to harvest young-growth timber at 65 years of age instead of the maximum growth potential of 90-100. This would increase the amount of access roads and acreage of timber harvesting to produce the same amount of timber.				
64	The DEIS fails to disclose plans to reduce scenic integrity objectives. The DEIS claims that no changes in Visual Priority Routes, or scenery standards are proposed under any alternative, and that old-growth harvests would follow Forest Plan scenic integrity objectives for all alternatives. However, the Forest Service has planned a Forest Plan amendment to lower adopted Scenic Integrity objectives in order to allow for increased volume through clearcutting on scenic viewsheds adjacent to Frederick Sound, Wrangell Narrows, Sumner Straits and on all sides of Wrangell Island. The amendment could result in additional 12,084 acres of clear-cuts visible from Forest Plan Visual Priority Routes and Use Areas that provide scenery.				
185	Impacts to viewshed in adjacent National Park Service lands should be considered in the EIS. Removing roadless rule protections could impact viewsheds for cultural landscapes like the Skagway and White Pass District National Historic Landmark managed by Klondike National Historic Park.				
187	The DEIS acknowledges that road construction will pose environmental risks to marine wildlife, yet the EIS claims that "excepting the Tongass from the Roadless Rule would have negligible effects on marine habitat." Analyses should be conducted to determine the effects on marine habitats.				
188	The DEIS incorrectly depicts a moderate to high probability of maintaining viable, well distributed wildlife populations for all species identified for the DEIS. Without providing any scientific analyses except referral to the Habitat Conservation Strategy in the 2016 Tongass Plan, the agency uses no scientific rationale for their findings. On the contrary, many of the species, including endemic mammals and Management Indicator Species such as the American marten, illustrate declines on the Tongass since large-scale, industrial logging began in the 1950s. The 2016 Tongass Plan amendment does not provide a rational basis for concluding that future Forest Service actions would maintain viable, well-distributed populations of endemic species on the Tongass and cannot be relied upon as the scientific rationale for this DEIS. This DEIS's analysis of the impacts on endemic terrestrial mammals (especially ermine, flying squirrel, Pacific marten, and wolves) is unsubstantiated and inadequate.				
193	Changes in roadless status of Tongass National Forest lands adjacent to National Park Service-managed wilderness have the potential to affect wilderness qualities, viewshed, and visitor experience within the Glacier Bay National Park Wilderness. These impacts should be evaluated.				
194	The DEIS does not adequately address the impact the alternatives will have on Federal and State budgets. Commenters request analyses to address this concern.				
197	The failure of the DEIS to accurately analyze relevant information by comparing the respective socio-economic contributions of timber sale purchasers and visitor products providers subverted NEPA's purpose of ensuring the availability of an "accurate assessment of the information" necessary to evaluate project impacts. The DEIS discloses visitor industry impacts broadly, but then relied on outdated information and erroneous assumptions that minimize the regional scale of the industry.				

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198	If implementation of the proposed rule results in timber sales at the target levels specified in the 2016 Forest Plan, it would represent a significant increase from current practice. The Forest Service's claim that the proposed rule would not increase agency costs because it would not increase timber harvest levels is unfounded. The Forest Service must develop a more comprehensive estimate of anticipated agency costs and losses from below-cost timber sales before any alternative is selected and a final rule is promulgated.				
199	The Forest Service ignores the science of the impacts of island ecology in the DEIS and grossly minimizes the diversity of endemic animals and plants. The Forest Service's reliance on habitat thresholds for endemic mammals has no basis in the contemporary science of conservation biology of island endemics. Islands are key regions for sustaining the evolutionary processes related to diversification.				
65	The DEIS does not discuss the impact of environmental issues that it claims to address and instead references the 2016 Tongass Forest Plan Amendment EIS. The DEIS must be changed to discuss significant environmental impacts rather than simply incorporating them by reference. The majority of this DEIS relies on the biological assessments (BA) conducted by the National Marine Fisheries Service (NOAA) for the 2016 forest plant. However, the new Forest Service plan is fundamentally different to that introduced in 2016. The new plan aims to open areas for logging that will no longer be protected by the roadless rule.				
201	Wolf harvests increase with increasing road density, yet the current Forest Plan does not require road density limits where wolf mortality is a concern. The DEIS should consider the impacts the proposed rule will have on wolf survival.				
203	The EIS states "The Regional Forester may issue administrative corrections after a 30-day public notice and opportunity to comment period" and "The Regional Forester would provide at least a 45-day public notice and opportunity to comment period for all modifications." Please expand on this public involvement process to explain how the Regional Forester would consider any public comments received on the administrative corrections or modifications to the Chugach National Forest.				
205	The DEIS fails to disclose that public scoping comments were overwhelmingly opposed to the Forest Service's proposal to change the Roadless Rule in Alaska.				
211	The DEIS reflects an overly narrow focus on providing timber for two companies, Alcan/Transpac (which currently holds 56 percent of sold and uncut Tongass timber) and Viking Lumber (which currently holds 28 percent of sold and uncut Tongass timber). The singular goal of exemption is to allow the two companies who purchased large timber sales from the government opportunities to realize some cost-savings by authorizing them to clear-cut some of the last remaining stands of high volume old-growth forest.				
220	The Change to Timber Land Suitability acres should be updated to remove the Alaska Roadless Areas and LUD II Priority lands and reflect that timber production will not occur in these areas. Designated Alaska Roadless Areas and LUD II Priority lands are not suitable for timber production, since timber production and road construction is inconsistent with Roadless Area and LUD II desired conditions.				
66	The DEIS downplays the potential negative impacts the proposed rule will have on the environment, ecosystem services, society, and economy by underestimating the value of intact old-growth forests and overestimating the benefits to economy.				
217	Despite the fact that the preferred alternative would eliminate the Roadless Rule's prohibitions on road building and logging on all 9.2 million acres of inventoried roadless areas on the Tongass National Forest, the Federal Register notice nonsensically states that "the proposed rule would not cause a substantial loss of roadless protections" the DEIS claims that exempting the Tongass from the Roadless Rule (and all other alternatives) would have "negligible" effects on fish habitat and are not expected to affect the fishing industry, despite acknowledging that "roads pose the greatest risk to fish resources on the Tongass."				
224	The proposed rule and accompanying DEIS includes problematic language when referencing proposed changes to the management of IRAs in the Chugach National Forest. Specifically, the proposed Alaska Rule contains the following provision pertaining to the Chugach: Administrative modifications to Classifications and Boundaries. The Regional Forester for the Alaska Region may issue modifications to the classifications and boundaries of an Inventoried Roadless Area after a 45-day public notice and opportunity to comment period. This provision would permit Forest Service staff to make decisions on road construction and commercial logging in the Chugach National Forest, which could effectively repeal existing roadless protections. The lack of clarity as to the definition and scope of modifications and classifications seems to allow the Regional Forester to completely remove an area's protections, regardless of the size of the repeal or the activity to be permitted.				
230	The DEIS acknowledges that none of the Roadless Rule exemption alternatives will have any economic impact in terms of jobs and employment in the region relative to keeping the Roadless Rule intact. Instead, this action aims solely at achieving cost savings for timber sale purchasers.				
232	The DEIS does not support the Alaska's petition to amend or repeal the Roadless Rule. The DEIS describes Alternative 1 as providing the most comprehensive social, economic, and environmental protections.				
235	When it comes to key issue 3 - conserving terrestrial habitat, aquatic habitat, and biological diversity - Alternative 1 is the best alternative. Under Alternative 1 overall impacts due to fragmentation and on the Old-growth Habitat Conservation Strategy are expected to be minor and consistent with the existing Forest Plan. In contrast, harvest associated with all action alternatives would contribute to the cumulative reduction in POG and associated increase in fragmentation and loss of connectivity, which has the potential to reduce biological diversity.				

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67	The DEIS states that timber harvest is needed to maintain, restore, or improve fish habitat. Alaska has been managing wildlife in accordance with the state's Intensive Management principles laid out in the Alaska Code (ALASKA STAT. § 16.05.255). The State of Alaska wildlife management mandates are at odds with maintaining desired ecosystem characteristics in roadless areas. This part should be deleted, since the State could influence wildlife habitat management proposals which has happened with this ARR proposal.				
68	The DEIS makes erroneous claims that logging in the Tongass National Forest could lead to reductions of greenhouse gases.				
288	The DEIS does not accurately describe the current limitations on the construction, operation, and maintenance of roads and utilities connecting the communities of Southeast Alaska.				
289	DEIS lacks mention of the federal powersite classification and Southeast Intertie, its authorization in the Public Law, and its support from the Southeastern Alaskan communities. Only Alternative 6 permits or recognizes the legal standing of the US federal powersite classification on select hydropower resources. The Forest Service needs to address the contradiction between Public Law 106-511, Title VI, and the Roadless Rule.				
69	The DEIS and proposed rule did not mention reforestation plans. Commenters express concern with regards to the lack of these plans.				
70	Despite knowing that young-growth is as productive as old-growth and this is an existing sustainable supply available for harvest, the Forest Service failed to provide this information to the public and include it in the DEIS analysis.				
292	In multiple chapters, the DEIS references that the impacts are similar or the same to those disclosed in the 2016 Forest Plan Final EIS. While it is appropriate to incorporate by reference, the EIS would benefit from including a summary of the effects for each of the various impacts from the 2016 Forest Plan Final EIS. This will reduce the need for the reader to search for the summary findings in the 2016 Forest Plan Final EIS.				
293	The State of Alaska in their letter requested several edits (additions/deletions) be incorporated into the FEIS				
294	The FEIS analysis should address how the Forest Service will restore or maintain the diversity of ecosystems and habitat types within the planning area. The large-tree old growth should be considered a distinct habitat type under the planning regulations. These forest communities (as well as old-growth cedar stands) are very rare and have been a primary target of past timber harvest. These forest communities (habitat types) are at significant risk of being largely eliminated on northern Prince of Wales and a few other bio-geographic provinces of the Tongass				
295	The DEIS currently defines "remoteness", which should be replaced with "desired Recreation Opportunity Spectrum (ROS) descriptions". The FEIS should describe that, "Primitive, semi-primitive non-motorized, and semi-primitive motorized Recreation Opportunity Spectrum class settings have a natural or natural-appearing environment. These ROS settings are not suitable for timber production."				
134	The Roadless Rule is preventing Alaska Native Vietnam veterans from accessing their land allotments.				
138	In the Alaska Roadless Rulemaking process, it is clear that the legally required tribal consultation has been completely inadequate. The State of Alaska was granted $2 million to participate as a cooperating agency, while the tribal governments that participated in this capacity did not receive funds to pay the direct costs incurred. Tribal officials were not consulted early in the process of developing the proposed regulation; we were notified of the rulemaking process *after* the State of Alaska's petition had been granted. We have not seen a tribal summary impact statement and we assert that our concerns have been inadequately addressed. We supported a no-action alternative and were *told* that the preferred alternative would be a full exemption. Despite creating a regulatory change for issues related to tribal trust resources, the USDA did not use 'consensual mechanisms' for developing regulations; our concerns were not heard or reflected in the AKRR DEIS, our requests for government-to-government consultation were repeatedly denied and not responded to in a prompt or timely manner.				
140	The Organized Village of Kake is concerned that following a full repeal of the 2001 Roadless Rule from the Tongass, the Forest Service will next attempt to revise the 2016 Tongass Land Management Plan, (TLMP) and amend it of authorize logging in roadless areas on a project-by-project basis. In such circumstances, it is likely the agency will turn to the analysis contained in any relevant EIS previously prepared for the Tongass National Forest for this rule making, including the analysis contained in the Alaska Roadless Rule DEIS. Given the agency must consult and coordinate forest planning on the Tongass National Forest with Alaska Native Tribes (36 C.F.R.291.4), we are gravely concerned that the agency's failure to consult and collaborate adequately with the tribe on this Alaska-specific roadless rulemaking process will impair the agency's performance of its responsibility to consult and coordinate with Tribe regarding any future DEIS for the Tongass. Both outcomes impair the Tribe's responsibility to "protect the general welfare and security of the village."				
142	Despite the Forest Service being obliged to consult with tribes on a government-to-government basis, the Forest Service has not meaningfully engaged Southeast Alaska tribal communities in this rule-making process. Six sovereign tribal governments became cooperating agencies with the Forest Service in the rulemaking process. These tribes became cooperators in good faith and invested considerable time and effort in the process, communicating with the Forest Service and meeting deadlines for meaningful comments. All six cooperating agency tribes co-signed a letter opposing a full exemption of the rule, and individual tribes including Craig, Kake, Saxman, and Kasaan passed tribal resolutions favoring the 'no action' alternative in the rulemaking process.				

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144	Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," directs each Federal Agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations," including tribal populations. The fact that Organized Village of Kake tribal citizens rely on the surrounding intact habitat provided by inventoried roadless areas for our food security, cultural practices and traditional way of life means that compliance with E.O. 128987 has been insufficiently analyzed in the Alaska Roadless Rulemaking process. Our tribal communities will be disproportionately impacted by proposed regulatory changes and this is a potential violation of the U.S. government's own regulations concerning environmental justice.				
148	On February 5th, 2019, HCA signed a Memorandum of Understanding with the United States Department of Agriculture, Forest Service (USDA Forest Service) in accordance with 40 CFR Section 1501.6 and 1508.5, and was established as a Cooperating Agency in the preparation of analysis and documentation under the National Environmental Policy Act (NEPA). On February 28, 2019, as a Cooperating Agency, HCA made comments on the Preliminary Draft Environmental Impact Statement. Between the PDEIS and the DEIS, the USDA Forest Service as the lead agency broke their trust with HCA as a Cooperating Agency. Suggestions for how to improve the analysis were not taken into consideration and community use area maps were not adjusted. Further, the spirit of compromise was abandoned when the U.S. Forest Service unilaterally decided to designate the full exemption alternative (Alternative 6) as the Preferred Alternative in the DEIS. Therefore, HCA prefers to make these current comments as a federally recognized Tribe, a sovereign nation in which the USDA Forest Service has a trust responsibility.				
151	As previously explained in HCA's February 28, 2019 letter, watersheds that have been identified as the most important to Hydaburg include the following: Hetta Lake, Eek Lake, Nutkwa Inlet, Keete Inlet, Hunter's Bay, Manhattan Lake (on Dall Island) and the whole of Sukkwan Island. These areas encompass culturally and traditionally important sockeye salmon systems (in addition to other locations), as identified by Langdon and Sanderson (2009). In many areas within these watersheds, the 2001 Roadless Rule are the only protections that apply. Further, the TNC/Audubon Conservation Priority Areas and Tongass 77 Watershed lists do not add any additional protections, if the Watershed Priority is applied, as these watersheds were not included on those lists. This subject will continue to be of great concern to HCA, until an alternative that includes continued protections to these watersheds is developed. A primary example, but not the only example, is Sukkwan Island. Sukkwan Island hosts two important sockeye salmon systems, important habitat for other salmon species, important hunting and trapping areas, and numerous cultural sites. Landownership on the island is predominantly USDA Forest Service Lands. Hydaburg supported the Sealaska Land Bill in 2014, because it included LUD II designations for Eek Lake and Sukkwan Island. However, much of the west side of the island is NOT designated LUD II and the only protections it current has is the 2001 Roadless Rule.				
152	Sitka black-tailed deer are the most important land mammal species for traditional and customary use by indigenous peoples of Prince of Wales Island. Typically for an EIS, the USDA Forest Service conducts a Biological Evaluation for proposed projects and the effects analysis for Sitka black-tailed deer includes assessing the stability of deer populations as a function of deer habitat. The removal of lower elevation productive old-growth forest habitats is a key factor in determining the effects of an action on the species. The Alaska Roadless Rule DEIS is lacking in proper analysis regarding the potential effects of the removal of essential deer habitat in areas where unfragmented habitat still exists. Further, the Preferred Alternative (Alternative 6) would be the first step needed to begin timber harvest on Prince of Wales Island that would have significant and adverse impacts and cumulative effects on deer habitat.				
154	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 the Sitka Tribe of Alaska.				
155	We, the Federally Recognized Tribe of the Village of Kake, were not granted Sovereignty; we have always maintained it, since time immemorial. The U.S. Government is our Fiduciary Trustee of natural resources, which means the government must act with Good Faith and Loyalty to promote the best interests of the Indians. To achieve that end, the Organized Village of Kake advocates for no changes to the roadless rule apart from inclusion of the aforementioned inventoried roadless areas that were excluded from original protections underneath the 2001 Rule.				
156	The State of Alaska's Citizen Advisory Committee (CAC) was put together hastily without any of the procedural safeguards. The CAC members lacked understanding of the Roadless Rule and lacked resources to make informed decisions. The CAC members were primarily in resource extraction industries like logging and not representative of all stakeholders. The CAC lacked any members from the industries of tourism, visitor services, fishing and hunting, those operating on special use permits, and scientists and technical experts.				
158	Many Citizen Advisory Committee members feel that their recommendations were not carefully considered and/or reflected in the DEIS, particularly the exceptions language that the Committee had agreed should be applied to any option or alternative put forward.				

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161	The Alaska Roadless Rule Citizen Advisory Committee included a diverse group of stakeholders. A considerable amount of time, energy, and money was invested in collaboration across industry sectors, interest groups, and tribal government representation during this process in order to create suggestions for a durable solution for Southeast Alaska roadless area conservation and management. The recommendations that were made would have satisfied all sides and found ways to preserve the unique natural roadless characteristics of inventoried roadless areas on the Tongass, while also allowing direction for land managers to implement community-priority projects in the least impactful way in order to benefit community and tribal priorities. Unfortunately, the consensus report, Alaska Roadless Area characteristics, and community-focused exceptions language was all thrown out in favor of an extreme alternative, the full exemption. The selection of this extreme alternative has polarized the discussion and made it difficult to engage in a nuanced conversation about what may best suit community and tribal priorities on the Tongass, especially due to the political interference in the rulemaking process.				
168	Commenters request explanation for vague language in Alternatives 2-5 that lacks the mandatory authorization language proposed by The Citizen Advisory Committee including the new road exceptions and timber cutting exceptions. Commenters express concern regarding the existing regulatory language which was retained from the 2001 Roadless Rule.				
39	Rulemaking processes in place contribute to a practice of discrimination by minimizing or eliminating the voices of marginalized and low-income communities.				
37	Environmental justice concerns for the proposed rule should be considered as effects on culture, not solely based on race designations.				
38	Exempting the Tongass National Forest is a human rights issue and an act of racially motivated environmental injustice. Exempting the Tongass National Forest is a violation of indigenous rights and will contribute to the ongoing genocide of Indigenous Peoples whose identities, cultures, and livelihoods are integral to the forest.				
186	The DEIS defers analyses of localized effects (community scale analyses) to subsequent site-specific proposals under the new rule. This places an undue burden on local communities, particularly low income and marginalized communities that may lack resources necessary to conduct these analyses.				
20	When it was adopted, the Roadless Rule was the most publicly supported rulemaking in U.S. history with over one million comments and 600 public hearings. This policy was endorsed by more than 500 scientists who believed that the Roadless Rule was the most scientifically credible approach for managing and protecting our last undeveloped national forests. The Roadless Rule received overwhelming support from the general public and diverse stakeholder groups, including industry stakeholders, Tribal Nations, cooperating agencies, conservation groups and non-governmental agencies who provided feedback on the implementation of the Roadless Rule in Alaska. Commenters express that exempting the Tongass National Forest from the Roadless Rule would be ignoring local interests and unprecedented public support, while casting aside years of collaboration with diverse stakeholder groups.				
189	Commenters expressed support for Alternative 1 without rationale.				
190	Commenters expressed support for Alternative 1 and support for maintaining and extending protection of the Tongass National Forest. Commenters express that there's an intrinsic value in undisturbed, intact wild areas and that these areas should remain undisturbed for a sustainable future and national heritage.				
191	Despite receiving a 90% response from Southeast Alaskans in opposition of lifting the Roadless Rule, other alternatives are still being sought. Additionally, across the United States there was a 70% opposition response to lifting the Roadless Rule in the Tongass.				
36	Commenters expressed that the Roadless Rule is unnecessary because of other protections that are in place, such as the Tongass Timber Reform Act, Wilderness and national monument designations, National Environmental Policy Act, planning processes put into place by Congress, National Forest Management Act, and the Tongass Land Management Plan. Commenters also suggest that the Tongass does not require protection because there is already a sufficient amount of land protected in the world.				
195	The Roadless Rule should remain intact because it provides unique protections for the Tongass that will not be provided by any other legislation. This is because the Forest Service proposed administrative changes to the forest plan to reclassify areas as suitable for logging. The Forest Service also often opens areas to logging on a project-by-project basis, which could expand logging beyond the initial 185,000 acres.				
196	LUD II priority and roadless protections should overlap to ensure the greatest restriction on road construction. One of the strongest combinations of protecting National Forest System lands from degradation is overlapping special area designations. These overlapping designations provide a complimentary framework for a high-level of protection from overuse and development of federal lands.				
200	The exemption does not set a maximum limit on logging, which increases risk of significant environmental damage. The Projected Timber Sale Quantity is insufficient to determine maximum limits to logging because it only determines maximum harvest by a suitable yield limit, which could increase with exemption by increasing the total amount of suitable forestland.				
12	Commenters expressed support for Alternative 2 because it protects current roadless areas and expands protections, while balancing timber harvest, conservation, and management goals.				
13	Commenters expressed preference for Alternative 1 and then provided secondary preferences. Individuals listing Alternative 2 as a secondary preference did so because there would not be a significant net change in acres protected.				
202	Commenters expressed general opposition towards alternative 3 as it would extend areas that allow logging.				

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14	Commenters expressed support for Alternative 3 because the designations of the Roadless Areas will be updated where previous development and timber harvest has occurred. Commenters also expressed support for Alternative 3 because it limits new natural resource extraction and development to previously developed areas, keeping the scale of development small.				
204	Commenters expressed support for the Community Priority Areas outlined in Alternative 3, so that local communities directly benefit economically to the small-scale development and resource extraction that would occur under this alternative.				
16	Commenters express support for Alternative 4, as it provides for scenic watersheds and Audubon priorities, and it is a compromise that allows for economic development and the protection of roadless characteristics.				
206	Commenters expressed opposition for Alternative 4 without rationale.				
207	Including the Timber Priority LUD within the ARR boundary is confusing and inappropriate. Timber production is incompatible with protecting roadless area values. Alternative 4 should describe exempting/excluding 749,000 acres of the Timber Production Priority LUD land from the ARR or preferably be eliminated from further consideration in this rulemaking process.				
209	Commenters express opposition to Alternative 5 due to concern that the same extent of logging would be pursued as the Alternative 6.				
210	Commenters express opposition to both Alternatives 4 and 5 as they would convert inventoried roadless areas into roadless priority areas, which reduce protections for these designated areas.				
212	Commenters expressed support for Alternative 6 without rationale.				
213	Commenters express opposition to Alternative 6, stating that this should not be the preferred alternative.				
214	Alternative 6 is not feasible because of the Environmental Impact Statement.				
216	Commenters expressed support for expanding the Roadless Protections in the state of Alaska, so additional lands would be designated as off-limits to development. Commenters also specifically requested expanded protections for T77 and TNC/Audubon Conservation Areas, outside of current roadless areas.				
298	Commenters suggest the Forest Service extend the exemption from the Roadless Rule to the Chugach National Forest to improve access for hydropower development				
226	Commenters expressed support for maintaining Roadless Rule protections in several specific areas in Alaska.				
228	Commenters request the Forest Service reinstate the Transportation Utility System Land Use Designation (TUS LUD) that had been removed in the 2016 version of the Tongass Land Management Plan. This would allow access for renewable energy projects that would have climate change benefits and benefit the local community.				
233	Alternatives 2-5 require additional approval from the "Responsible Official" of the Forest Service to decide whether a road is needed. Commenters consider this an unnecessary requirement that impedes development because the decision is made without any criteria and development projects are sufficiently regulated by meeting requirements for complex federal, state and local permitting, and complying with the USFS TLMP and a Federal Energy Regulatory Commission EIS.				
238	The USDA should provide public outreach to educate the public about Alternative 6 to reduce opposition. For example, commenters expressed that the USDA should clarify for the public that fears of the environmental effects of large-scale clearcutting is based upon inaccurate information and not supported by USDA rules governing timber sales.				
241	Commenters requested that the Forest Service select an alternative that balances environmental protections with economic development.				
242	Commenters express support for designating the Tongass as a national monument.				
74	Commenters express support for designating the Tongass as a national park instead of a national forest, because it would increase protection of the forest.				
244	Commenters express support for designating specific areas in the Tongass as managed farming zones.				
245	The language in the proposed rule that allows changes to designations within the Chugach National Forest are too broad and not specific enough. Allowing changes to designations for administrative purposes would allow the Regional Forester to make designation changes without substantive reason or purpose. Section 294.51(a)(2) should be removed and more explicit language should be used in Section 294.51(a)(1).				
247	The public was informed repeatedly that changes to the Roadless Rule would only materially apply to the Tongass National Forest. The proposed rule allows for broad changes in designations in the Chugach. This is inconsistent with the messaging used to inform the public about the proposed rule. To be consistent with the DEIS and public hearings, section 294.51(a)(2) should be removed from the proposed rule.				
266	Commenters wanted to keep Roadless Rule protections for Chugach National Forest because they do not want pristine habitats to be negatively impact by the proposed rule changes.				
249	Commenters express opposition to the proposed rule because it has the potential to lead to logging activities in the Chugach National Forest.				
267	The proposed rule will lead to the development of roads in Chugach National Forest, which will have negative impacts on numerous species of bird, mammals and marine wildlife.				
268	Exempting Tongass from the Roadless Rule could result in the loss of ecosystem services including oxygen production, filtration of air, water and soil, as well as loss of fisheries and game populations.				
89	Keeping the Roadless Rule intact will continue to preserve and protect the sensitive ecosystems of the Tongass for future generations.				

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79	Exempting the Tongass National Forest will result in natural resource extraction and development throughout the forest which will negatively impact wildlife by fragmenting habitat and destroying landscape connectivity.				
80	Exempting the Tongass from the Roadless Rule could lead to disturbance, development, or logging that that will damage sensitive and pristine ecosystems permanently. These ecosystems will never be recovered. Ancient forests that are cut cannot be replaced.				
95	Keeping the Roadless Rule intact will protect the old-growth habitats within the Tongass, which provides sensitive habitat for over 30 endemic species. The benefits old-growth forests provide are essential to the survival and viability of the ecosystem. Old-growth habitat is rare, with over 95% of the United States' original old-growth forests destroyed, making it a valuable resource as a protected, intact forest and critical to preserve.				
269	Keeping the Roadless Rule in place will protect essential habitat important for fish viability. Fish like salmon are economically and culturally important species that have complex rearing and spawning behaviors that require healthy ecosystems.				
270	Exempting the Tongass National Forest from the Roadless Rule will increase activities that facilitate the spread of invasive species that negatively impact ecosystems. Invasive species can reproduce and generate biomass at a faster rate than the native species which puts native species at risk due to limited food resources.				
271	Exempting the Tongass National Forest will lead to activities that will increase the occurrence of pest species that will further degrade the health of the environment. Pest infestation following natural resource extraction and development have been linked to the loss of other iconic forests. Pests of concern include the hemlock woolly adelgid, emerald ash borer, and Douglas-fir beetle.				
272	Exempting the Tongass National Forest can lead to natural resource extraction and developmental activities that will harm vegetation. For example, loss of trees can cause nutrients to move slower between plants, which in turn will stunt overall growth and the loss of the Yellow Cedar trees on Chichagof Island.				
73	Exempting the Tongass from the Roadless Rule will lead to disturbances in sensitive habitat that would negatively impact both plant and animal communities and cause decreased biodiversity in the Tongass. Loss of biodiversity can lead to ecosystem collapse.				
274	Commenters ask to preserve key wetland areas in the Tongass such as the T77 for its value as the highest quality salmon-producing watershed and other ecosystem services from wetland areas. The area is described as a "pristine fish habitat" which hosts thousands of miles of clean creeks, rivers and lakes that allow lots of salmon breeding. Wetlands overall can help mitigate effects of hurricanes and help filter water				
275	Commenters requested the Forest Service to focus on restoring the streams and habitat, removing or replacing culverts and improving fish passage, rather than moving forward with the proposed rule.				
40	Commenters express support for Alternative 1 and request the Forest Service maintain the Roadless Rule protections for the Tongass National Forest because it effectively balances sustainable economic development and conservation goals. 28% of the employment in the Tongass depend on an intact and pristine forest ecosystem. Businesses supported by protected and intact ecosystems include fisheries, ecotourism, and sustainable energy industries.				
41	Commenters expressed that the proposed rule will lead to the extraction of natural resources, which will bring jobs to the area, reduce demand for select imports, and stimulate the economy. Additional roads and rights of way for utilities are necessary for economic development, particularly for the 29 of 32 communities in the region that are not connected to the nation's highway system and are typically surrounded by marine waters and undeveloped Forest land. Exemption will support local communities that live, work, hunt, and fish in the Tongass.				
276	The Roadless Rule does not include a realistic renewable energy resource plan and fails to recognize pre-existing powersite classifications and other renewable energy sources such as hydropower, geothermal, and wind. The Roadless Rule impedes access and development of renewable energy and transmission lines for Southeast Alaska by limiting and increasing the cost of planning, environmental studies, construction, permitting, and maintenance. Allowing access for renewable energy would eliminate the area's dependence on expensive diesel for electrical power. Access to local renewable energy would reduce costs for local communities, provide jobs, improve the standard of living, and reduce emissions, which would have climate change benefits.				
277	Commercial fishing operators in the Tongass disagree with the Forest Service's assessment of impacts on their livelihood. In an October 2019 letter to Secretary Perdue and Chief Christiansen from over 200 men and women in the Alaska fishing industry, the signatories request that the Forest Service select, "...an alternative that broadly protects fish habitat, continues the phase-out of industrial scale old-growth clear-cutting, and prioritizes the restoration of degraded watersheds and streams." They state that removing roadless protections and reinstating more clear-cut logging will directly threaten their industry and livelihood.				

CARA Concern Number	CARA Concern Text				
278	Washington is the closest state to Alaska and shares close business, economic and cultural connections. Alaska Airlines alone has 24 daily nonstop flights between Seattle and the Southeast Alaska communities of Sitka, Ketchikan and Juneau. A rich cultural connection to salmon inspired by our local Tribes and natural history is shared between our two states. The Tongass National Forest produces on average 28% of Alaska's annual commercial salmon catch, and 25% of the entire west coast annual harvest. A significant number of commercial fishing permits held in Southeast and offshore waters in Alaska have their home port in Washington State in places like Seattle's Fisherman's Terminal or Westport on the Olympic coast. Additionally, five major cruise lines, including Celebrity, Princess, Carnival, Norwegian and Holland America, offer 80 cruises departing from Seattle to the inside passage, the Tongass National Forest and Glacier Bay National Park each summer. The Tongass National Forest and its roadless areas are a central draw and attraction to visitation from Washingtonians and other tourists from around the country and the world. The forest watersheds, wildlife habitat and scenery directly support the visitor experience to nearby national park areas. According to the Cruise Lines International Association, direct expenditures related to cruises from Seattle generated total economic impacts of 18,129 jobs and $949 million in income throughout the Washington economy during 2016.				
279	While industrial logging was a more significant economic driver in southeast Alaska from the 1950s to the 1990s, the regional economy has largely transitioned to other, more sustainable industries. The timber industry accounts for less than 1% of both total employment and total earnings in southeast Alaska and the majority of these positions are not held by individuals from local communities. New sustainable industries should be supported, including hemp, bamboo, and flax. Forest Service should support the fishing and tourism industries rather than logging.				
299	Renewable energy should be supported including nuclear, wind, and solar.				
96	Any direct and indirect profits made from exempting the Tongass National Forest from the Roadless Rule will not be long-lasting and only a small group of individuals and minority of industries will benefit. The long-term impacts will be substantial compared to the short-term benefits, negatively impacting a larger group of individuals and a majority of industries.				
280	The fishing industry accounts for over $2 billion in annual revenue compared the timber industry which losses $30 million annually. The Tongass produces the majority of the annual commercial salmon harvest in America. Exempting the Tongass National Forest can result in damaging the ecosystems required for sustaining this economically vital industry that supports local livelihoods and sustenance.				
281	Tourism is a major part of the Alaskan economy and creates more jobs than extraction industries do. Tourism accounts for 28% of employment in Alaska and generates $1 billion annually. Visitors travel from all around the world to see the old-growth forests, view wildlife, fish and hunt, explore the wild areas, and to experience unique cultural traditions. Tourism is a major driving economic force for the Alaskan economy and is worth more than the timber industry.				
282	Maintaining Roadless Rule protections is important as visitors travel to Alaska for pristine wilderness.				
283	Tourism only provides low-paying, seasonal jobs that are filled by teenagers and non-locals. These are insufficient to support local communities.				
284	Outdoor recreation is a major industry that contributes to the Alaskan economy. The Roadless Rule is crucial to protecting ecosystems that sustain natural resources important for recreational activities like birding, boating, camping, hunting and fishing. Outdoor recreation generates millions for the Alaskan economy and is worth more than the timber industry.				
285	The tourism industry is projected to increase to over 2.4 million visitors to the area. The Forest Service is not ready for this increase, and no plan is in place to prepare for this increase. Large group sites and trails are underdeveloped, and the Forest Service must focus on preparing for an increase tourism, rather than support logging.				
286	When the Forest Plan was originally developed it was based on the best available information; however, new information is available regarding the impacts of climate change on the area that should be incorporated into the Forest Plan.				
77	The wildlife viability assessments conducted for the Forest Plan to determine viability risk for 30 endemic species the Tongass National Forest had at least two major flaws with the calculations, which resulted in substantially underestimated viability risks for wildlife.				
300	Alternative 6 is in direct conflict with the Tongass Land Management Plan (TLMP). Moving forward with the proposed rule will negate the TLMP and require that it be updated. The TLMP should be updated before making any changes to the Roadless Rule Protections.				
287	The Forest Service should stop working on the Land and Resource Management Plan Amendment because it will weaken the scenery standards and significantly diminish scenic values important for ecotourism along cruise routes.				
291	The Secretary does not have the authority to change the 2016 Forest Plan without an environmental impact statement and an environmental assessment. The 2016 Forest Plan does not address the impacts that changing timber designations will have on roadless areas, which is required. Proposed changes will modify approved Final Environmental Impact Statements and Records of Decisions, including determinations that the Forest Plan is in alignment with Tongass Conservation Strategy and Recreation Opportunity Spectrum guidance. Substantial changes to suitable designations following the exemption of the Tongass National Forest would require following the rulemaking guidance for Special Areas, Forest Plan Amendment Revisions, and Administrative Procedures prior to any road or timber harvesting to proceed.				
296	The Land and Resource Management Plan Amendment should include updates to the suitable lands designation and timber transition strategies in consideration of the economic viability of the timber industry.				

CARA Concern Number	CARA Concern Text				
297	The 2016 Tongass Forest Plan Amendment failed to protect roadless area values where the plan established "Development LUDs" within roadless areas. Timber Production LUD management prescription is generally managed for a Roaded Modified ROS setting, which is inconsistent with protecting Roadless Area Characteristics. Removing roadless area protections provided by the "not suitable for timber production" plan component would lead to actions that substantially degrade Tongass National Forest roadless area values.				
301	Exempting the Tongass National Forest will ultimately result in changes to the 2016 Forest Plan which was the product of years of collaboration and compromise among diverse stakeholders that struck a careful balance among conservation and resource extraction interests. Unlike the ongoing roadless rulemaking, which relies on input from a nonrepresentative stakeholder group convened by the State of Alaska, the 2016 TLMP amendment is based on recommendations from the TAC, a duly convened federal advisory committee that complied with all procedural and substantive requirements of the federal advisory committee act. At its core, the TAC recommended phasing out large-scale old-growth logging over a 16-year period, easing standards and guides to allow increased access to young-growth timber as a way of encouraging the transition away from old-growth logging, and protecting important areas from future logging, including roadless areas, the Tongass 77, and TNC/Audubon Conservation Priority Areas. The TAC was clear that its recommendations must be taken as a whole and not adopted partially or in a piecemeal manner.				
304	Under the 2016 Forest Plan, only 9% of the original productive old-growth forest being harvest over the next 100 years, thus retaining 91% for future generations, and will not be destructive towards old-growth forest.				
308	Maps provided in the FEIS did not clearly identify the various protective land use designations for the Tongass, such as areas designated as wilderness, LUD II, and national monument lands. By not identifying these areas, the maps fail to provide viewers with an accurate picture of the existing protections that cover much of the Tongass.				
310	The Wildlife Conservation Strategy adopted as part of the TLMP is too restrictive for industry and needs to be updated to balance both the economy and environmental protections.				
313	The timber sale projections used in the 2016 Forest Plan far exceeds the industry needs. Timber available for harvest with the Roadless Rule in place satisfies the current market demand. Recent research shows that merchantable volumes for sites open to timber harvests all surpass past and future old-growth sale volumes. The proposed rule eliminates protections for old-growth trees and opens the area for logging, when there is no market demand.				
350	Alternatives 2, 3, 4, and 5 provide for a variety of management approaches within roadless areas through ARA land management categories which include Land Use Designation (LUD) II Priority, Watershed Priority, Roadless Priority, Community Priority, and Timber Priority. An ARR should use the same LUD categories that are found in the Forest Plan to allow for better integration of the rule direction and plan components.				
44	Exempting the Tongass National Forest from the Roadless Rule protections will lead to natural extraction and developmental activities that will accelerate climate change effects which will negatively impact the health and survival of humans, plants, fish and wildlife.				
45	The Tongass National Forest is the largest intact temperate forest in the United States (U.S.), storing more carbon than any other forest in the nation, while providing habitat and support for biodiverse wildlife. By keeping the Roadless Rule protections in place, a considerable amount of carbon sequestration can occur that will significantly contribute to climate change mitigation, while maintaining critical habitat. Logging within the Tongass National Forest will release considerable carbon reserves in addition to the loss of the carbon sequestration capabilities, contributing to the acceleration of climate change. Because old growth trees sequester more carbon than new growth, the carbon sequestration capabilities cannot be recovered following logging on a time scale sufficient for the mitigation demand. Removal of trees and secondary development activities (logging, road construction, resource extraction) that damage the old growth ecosystem will impact the capacity of other flora to sequester carbon.				
87	Exempting the Tongass National Forest from the Roadless Rule protections will lead to the removal of trees and damage to ecosystems which can exacerbate climate change effects. Climatic changes disrupt normal environmental parameters such as environmental fluid dynamics, ambient air temperature, water temperature, rainfall, and water acidity, which can have detrimental impacts on ecosystem services and natural resource availability.				
42	Exempting the Tongass National Forest from the Roadless Rule protections will lead to natural extraction and developmental activities that will accelerate acidification of water bodies. Acidification of waters will reduce the survival of calcifying species such as oysters, clams, corals, urchins, and certain phytoplankton which are food sources for humans and other wildlife. The loss of these species can have substantial consequences on the ecosystem structure, food systems, and subsequently negatively impact the economy.				
47	Uncertain and extreme weather events, as well as increased temperatures exacerbated by climate change can have catastrophic consequences such as increased incidence of flooding, fires, drought, landslides, as well as intensified hurricanes. Increased incidence and severity of natural disasters can have profound economic and public safety consequences by putting human health, infrastructure, and natural resources at risk.				

CARA Concern Number	CARA Concern Text				
43	Exempting the Tongass National Forest from the Roadless Rule can lead to developmental activities that increase the release of greenhouse gas emissions. Atmospheric concentrations of greenhouse gases (water vapor, nitrous oxide, carbon dioxide, methane, and chlorofluorocarbons) have changed with increases of emissions from human activities such as deforestation, burning of fossil fuels, production of energy, land use changes, landfill waste decomposition, as well as industrial and agricultural practices. Increases in these natural occurring greenhouse gases reinforce the trapping of heat from the Sun on Earth. Increases in temperature can create reinforcing feedback loops that can further increase greenhouse gases in the atmosphere, examples include: increased water vaporization, demand for heating and cooling, as well as increased releases of methane and carbon dioxide from thawing ice stores and permafrost.				
302	Exempting the Tongass National Forest from the Roadless Rule can lead to developmental activities that exacerbate climate change effects that will lead to communities being displaced.				
46	Exempting the Tongass National Forest from the Roadless Rule protections will exacerbate climate change. The long-term economic impacts of climate change will significantly outweigh any short-term economic benefits from natural resource extraction and development. Investing in the development of sustainable and innovative resource management can mitigate climate change effects, while providing jobs for Alaskans.				
303	The impacts of climate change that would result from increased development authorized by a full exemption from the 2001 Roadless Rule stand to disproportionately affect minority communities, especially rural Alaska Natives communities in Southeast Alaska. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," directs each Federal Agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations," including tribal populations.				
94	Exempting the Tongass National Forest will lead to activities that will accelerate the current mass extinction event that is reducing the number of plant and animal species worldwide. Removal of the roadless rule could lead to roads and development that reduce the acreage of suitable undisturbed habitat for sensitive species. This loss of habitat would reduce population sizes of sensitive species and increase their risk of extinction.				
305	Exempting the Tongass National Forest will lead to activities that will harm the survival of the Prince of Wales flying squirrel (Glaucomy sabrinus griseifrons). The Prince of Wales flying squirrel is considered to be both a keystone and indicator species that is endemic to the area. Activities that degrade the natural environment will harm the survival of this species, which will lead to a cascade of harm through the ecosystem.				
306	Deer depend on old-growth forest habitat for foraging and refuge from severe weather. Exempting the Tongass National Forest can lead to loss of habitat for these culturally important animals.				
307	Deer populations have already decreased due to environmental pressures such as timber harvest and development. Exempting the Tongass National Forest from the Roadless Rule will increase these environmental pressures which will negatively impact deer populations.				
312	Commenters want to keep the Roadless Rule intact to protect the Alexander Archipelago wolves.				
309	The Tongass National Forest provides a prime habitat for the Alexander Archipelago wolf to thrive. Exempting the Tongass National Forest can lead to loss of habitat for these culturally important animals and negatively impact their viability.				
311	Exempting the Tongass National Forest will lead to development that will negatively impact the survival and viability of environmentally and culturally important wolves, including the Alexander Archipelago wolves.				
314	Black and brown bears provide enormous economic, social, and cultural benefits within the region. Exempting the Tongass National Forest from the Roadless Rule will lead to activities such as habitat loss and encroachment activities that will negatively impact the survival of brown and black bears, thus reducing the socioeconomic benefits of healthy bear populations				
315	The Roadless Rule protects habitat for the Prince of Wales spruce grouse and the northern goshawk, which are environmentally and culturally important.				
317	Commenters identify that high-volume productive growth as optimal nesting and foraging habitat for goshawks due to the presence of large trees and snags. Logging generally decreases these areas, therefore, increasing mortality rates of goshawk.				
318	Exempting the Tongass National Forest from the Roadless Rule will lead to natural resource extraction and developmental activities that will negatively impact the habitat of black and brown bears.				
320	Maintaining salmon populations through the Roadless Rule protections will help preserve the food source for bears, sustaining their population numbers.				
321	Maintaining the Roadless Rule protections for the Tongass National Forest will protect habitat and resources necessary to reduce human-wildlife conflict. Removing these protections can lead to increases in human-wildlife conflict, threatening the well-being of humans.				
322	Exemption of the Tongass National Forest will negatively impact the viability of apex predators that are important for the health of ecosystems. The Tongass National Forest provides habitat to several apex predators. Apex predators are important for regulating populations of herbivores such as moose, elk, caribou within the Forest. This top down regulation supports the health of trees, as well as the overall health the forests.				
324	Exempting the Tongass National Forest from the Roadless Rule will lead to road development in Tongass National Forest which will lead to the displacement of wildlife. Road development will have detrimental effects on functional behaviors such as breeding and movement, that are essential for functional, healthy wildlife populations.				

CARA Concern Number	CARA Concern Text				
325	The environment of the Tongass National Forest provides a unique and critical habitat for various rare and endangered species to live and thrive. Exempting the Tongass National Forest from the Roadless Rule will result in activities that negatively impact rare and endangered species.				
316	Exempting the Tongass National Forest will allow for road development and logging that will cause soil erosion and sedimentation which leads to eutrophication of stream, riparian, and oceanic environments that effect salmon habitats. These impacts will negatively affect fish viability.				
319	Contrary to what is stated in the DEIS, leaving unlogged riparian forests is insufficient to mitigate for the effects of upland logging on streams, and may lead to mass erosion and channel erosion resulting from logging.				
323	Given the long history of below-cost timber sales in the Tongass National Forest and the economics of timber harvest in inventoried roadless areas, there is a concern the proposal to exempt the Tongass from the 2001 Roadless Rule will cost American taxpayers tens of millions of dollars in increased timber subsidies. Instead of moving ahead with the preferred alternative in the proposed rulemaking, TCS urges the Forest Service to re-examine and reform its current administration of timber sales in the Tongass. Implementation of such reforms would enable the development of a rule that better aligns the Forest Service's management priorities for the forest with the needs of the local and indigenous communities and the agency's responsibility to federal taxpayers				
326	Exempting the Tongass National Forest from the Roadless Rule protections will lead to the removal of trees and damage to ecosystems which can negatively impact ecosystem services. The Tongass National Forest management strategy should preserve and protect ecosystem services that will have long-term benefits.				
24	Commenters express that national forests, including the Tongass and Chugach National Forests, belong to all Americans, not just Alaskans, and should be protected by the Roadless Rule and Alternative 1. The State of Alaska was purchased with taxpayer money by the federal government and does not belong to just Alaskans.				
25	Commenters express opposition for opening public lands to private industry for natural resource extraction and development. National forests, including the Tongass National Forest, belong to the people, and do not belong to industry or to the government. Commenters express that the Tongass belongs to all citizens of the United States and Tribal Nations, and that selling the land would be going against public interest.				
328	Commenters express the need for Forest Service management of the Tongass that aligns with the multi-use purpose of the forest including logging, mining, and development.				
330	Commenters express concern about the Forest Service and their ability to manage forests, as they do not have the staff nor the budget to adequately enforce management of the forest.				
334	Forest Service officials in Tongass National Forest should have the decision-making authority concerning timber harvest, road construction and roadless area management. This should be done case-by-case and based upon existing laws and requirements that insure responsible and active management				
72	Commenters express doubt that the Forest Service has the ability or intention of exercising proper oversight				
208	Commenters expressed that the keeping the Roadless Rule protections intact for the Tongass and Chugach National Forests are in alignment with the Forest Service's mission. The proposed rule goes against the mission of 'Caring for the Land and Serving People.'				
340	Commenters expressed opposition to changes of the Roadless Rule protections for the Tongass and Chugach National Forests and concerns of corruption by decision-makers.				
91	Removing the Roadless Rule in Alaska will lead to the precedent of removing Roadless Rule protections in other areas. Exemption could set precedent leading to excessive logging and road construction in wild forests across the United States that are critical sources for clean water and air, as well as sensitive habitat.				
75	Exemption from the Roadless Rule would undo the work put into protecting this area and the time it took to reach this compromise. It would encourage the use of outdated practices that have been proven to be unsustainable for long-term growth, and that are not based on the latest, best available information.				
86	Decisions made regarding the management of the Tongass National Forest and the proposed rule should made using the best available and evidence-based information				
342	Exempting the Tongass National Forest will allow for old-growth timber harvest. The justification for harvesting old-growth timber is outdated and inadequate. The Forest Service's justification that old-growth is "bridge timber" to encourage the transition to young-growth is inadequate, as is the justification that industrial old-growth logging is necessary until young-growth timber volumes become economically viable.				
345	Alternative 6 would allow the Forest Service more flexibility in implementing management decisions to address industry and local community concerns.				
348	The State of Alaska claims in its petition that the Roadless Rule unnecessarily burdens development activities in the Tongass. However, the Roadless Rule currently provides flexibility in the form of special use exemptions, which allow for reasonable development activities that maintain the overall character of roadless areas. To date, all 58 project exemptions that have been requested in the Tongass have been approved by the Forest Service, and all are typically decided and approved within one month of submittal. Included in this list for the Tongass are dozens of mining projects, nine hydropower or power transmission intertie projects, a road realignment, and an aerial tram. These actions demonstrate that the current rule incorporates a flexible approach if the development activity is consistent with the conservation mandate of the Forest Service including the Roadless Rule				
349	Prior to the October 2019 DEIS release, the Forest Service deleted all young growth age-class data from their public portal, making it impossible for the public to consider the high-production of young growth timber.				

CARA Concern Number	CARA Concern Text				
327	Alaskans themselves can best manage responsible use of their lands. People not from Alaska, nor the Federal Government, should not have any say in what happens with the Roadless Rule. An Alaska state-specific rule is supported.				
329	Commenters request that the forest and wild areas to be managed in general and specifically by the Forest Service for the health of the forest.				
331	Projects that are already allowed to be permitted in roadless areas should be expressly provided for in any new Alaska Roadless Rule including: Powerline corridor to Takatz Lake, Blue Lake or Glacier Lake licensing or relicensing or additional generational capacity, and corridors for road connections.				
1	Exempting the Tongass National Forest from the Roadless Rule can lead to the removal of trees which can impact air quality by limiting oxygen production and air purification. Removing protections can lead to secondary (indirect) effects that can increase air toxic emissions, further reducing air quality. Negative impacts to air quality from the removal of trees and secondary (indirect) effects can exacerbate or worsen pre-existing conditions and disease risk. An increase in disease risk can lead to increases in health care costs, creating a reinforcing feedback loop where limitations to health care access further worsen health outcomes.				
5	The long-established Tongass National Forest is protected by the Roadless Rule, allowing for the last remaining old-growth ecosystems to sustain necessary resources utilized by local communities and Native Tribes for sustenance/subsistence, recreation, medicine, and cultural traditions. Protecting the Tongass National Forest from logging and development allows for cultural traditions to continue and to be taught to future generations				
3	Being in the Tongass National Forest provides a refuge bolstering mental, spiritual, and physical well-being. Exempting the Tongass from the Roadless Rule would result in removal of trees and harm to the old-growth ecosystems that provide mental, spiritual, and physical well-being to people. Removal of old-growth trees and secondary development would result in degradation of the environment and loss of the wilderness that will not recover quickly, resulting in spiritual and cultural loss for many generations. The negative mental, spiritual, and physical impacts resulting from loss of the old-growth forests will be magnified for those who witness it directly.				
4	The quality of the total environment (soil, air, water, and food) is intrinsically connected to human health and survival. Exempting the Tongass National Forest from the Roadless Rule would negatively impact the quality of the total environment and subsequently negatively impact human health and well-being. Negative impacts to environmental quality from the removal of trees and development, as well as associated secondary (indirect) effects can exacerbate or worsen pre-existing conditions and disease risk, especially for sensitive populations such as children and the elderly. Further, an increase in disease risk can lead to increased health care costs.				
76	Global loss of forests to deforestation and wildfires have made large intact forests increasingly rare. Exempting the Tongass National Forest can result in further loss in intact ecosystems that have global importance for sustaining life.				
335	There is no evidence that the old-growth forests of the Tongass have been assessed for their pharmaceutical value. Exempting the Tongass and logging these forests could result in the loss of future research potential and resources that could lead to new medicines and medical treatments.				
336	The Tongass National Forest is critical to Native Alaskans and the general southeastern Alaskan communities for various subsistence activities such fishing for salmon, hunting for moose, and foraging for wild foods. Low-income families require the ability to subsistence to keep a stable food supply. Maintaining the Roadless Rule will help maintain this access to subsistence.				
337	Logging will improve deer population numbers for hunters as outlined in the Quality Deer Management Association methods.				
338	Exemption could lead to the loss of a pristine environment and future research opportunities and discoveries. The old-growth stands need extensive study to further understand the value of products and services they provide. Additionally, the Roadless Rule protects the land as a source knowledge to study activities of ancient humans and the migration of the first humans to North America.				
339	Commenters express an obligation to protect and preserve the Tongass for religious reasons citing the Bible.				
265	While the Roadless Rule generally prohibits road building and other disruptive activities from taking place in roadless areas, existing Forest Service authority allows the Regional Forester to grant exemptions from the rule, including projects related to mining, hydroelectric power, and geothermal energy. Previously, the Forest Service Chief was responsible for making the decision on roadless exemptions. However, a 2018 USDA determination granted this authority to the Regional Forester to expedite the approval process for qualifying exemptions.				
264	The Roadless Rule is in compliance with the Mining Act of 1872 which ensures access to minerals, transportation, and energy development needs in the Tongass National Forest.				
263	Roadless rule inhibits access to new leases for minerals, including geothermal resources. Roadless rule inhibits mining and other mining related activities that are protected by U.S. mining laws. Discovering economic mineralization requires exploration to determine size and grade, which is not feasible without roads. The Roadless Rule also inhibits mining because it does not allow cutting and removal of trees associated with mining exploration and development. Exploration requires an ever-increasing level of investigation to add certainty to resource/reserve information to support financing in public markets.				
88	Commenters express support for Alternative 1 and are specifically against opening the Tongass Forest to natural resource extraction (logging, drilling, mining) because these activities will degrade habitat and negatively affect wildlife viability. It would be difficult for the ecosystem to recover from the damage that natural resource extraction will cause, as demonstrated by other forests in the Pacific Northwest that have been logged and developed.				

CARA Concern Number	CARA Concern Text				
262	Natural resource extraction like mining is environmentally safe and has a small, temporary footprint. Regulations by permits require that mines including the roads, infrastructure and surface impacts are reclaimed upon the end of mine life.				
261	Commenters expressed general support for logging and evidence-based logging practices that are sustainable and protective of ecosystems and communities.				
341	Any profits made from logging should be paid back to taxpayers to relieve the federal deficit.				
260	The current timber harvesting practices are not sustainable. Timber harvests in Alaska are hard to manage as it is a very harsh environment where logging could only be done for a few months out of a year.				
85	Exempting the Tongass from the Roadless Rule will lead to logging of old-growth and intact forest ecosystems, which is expensive and not needed because there are many timber resources established for harvesting that are more sustainable and cost efficient within the Tongass area and beyond.				
259	Commenters asked that the Tongass National Forest be exempted from the Roadless Rule to allow logging for the purpose of preventing and controlling forest fires and providing new growth for wildlife and livestock.				
258	Taxpayers for Common Sense (TCS) recently completed a comprehensive, twenty-year analysis of the Tongass timber program that included costs of road construction and maintenance. TCS concluded that, in total, the Forest Service lost around $600 million over two decades, or $30 million per year on average. In its projection over the next four years, TCS concluded that the Forest Service could end up losing more than $180 million during that period. Given the significant losses that the Forest Service incurs through administering its timber program in the Tongass, it is not prudent public policy to exacerbate this problem by making more timberlands available in the Tongass. It is not good policy for taxpayer subsidies to underwrite the cost of logging some of the last remaining, ecologically important old-growth forests on public lands.				
257	Timber sales reflect the current realities of logging on the Tongass, that even with substantial taxpayer subsidies, the high costs of production and distance to market make this timber uncompetitive and unprofitable. A recent example of taxpayer loss is the North Kuiu timber sale, which the Forest Service offered twice, in 2016 and 2018, and did not receive any bids. The total cost of preparing this sale was $4.5 million, including $3 million in construction of logging roads				
256	Exempting the Tongass National Forest from the Roadless Rule would increase economically inviable timber harvests that do not meet the congressionally mandated residual value appraisal standards. If the indicated advertised rate - the selling value minus the production costs and the 15 percent profit and risk margin - is negative, the Forest Service is prohibited from advertising the sale. In recent years, many of the timber sales prepared by the Forest Service have had a deficit appraisal.				
28	Timber in the Tongass is primarily exported overseas to European and Asian countries. This leads to helping other countries' economies while negatively impacting the Alaskan economy.				
83	Commenters express that any profits from harvesting should remain in the local economy.				
254	The Roadless Rule prevents successful timber harvesting due to continuous appeals and litigations causing delays.				
253	Additions of suitable timber lands proposed in the exemption would provide the necessary flexibility in selection to allow the Forest Service to offer economic timber sales that meet the needs of the timber industry and contribute to rural economies.				
243	Regulations should be expanded to ensure that timber industries are restricted from logging in any old-growth and rainforest habitats.				
252	Commenters expressed support for a second growth timber management strategy.				
251	Exempting the Tongass National Forest from the Roadless Rule will lead to increased logging that will impair waterbodies, negatively impact wetlands and degrade watershed ecosystems.				
250	Commenters indicate that logging either enhances or does not harm watershed ecosystems.				
248	Prior to implementing the proposed rule change, the Forest Service should evaluate the impact of clear-cutting practices on the environment and address issues with this methodology through regulation.				
246	Exempting the Tongass National Forest will lead to new roads being built. Additional access roads are not needed for timber harvests because the existing roads are sufficient. The government has also stated that getting rid of the Roadless Rule will have no effect on the current levels on logging, so there is no need to add more roads for timber access.				
344	Commenters express general support for building additional roads.				
243	Commenters express support for building roads sustainably with standards that preserve natural watersheds and the health of forests.				
346	Commenters express general support for development in the Tongass.				
240	The Roadless Rule was established to address environmental and fiscal concerns with road development on public lands. The Forest Service need to address the backlog of road maintenance in Alaska, rather than build more roads. The Forest Service had accumulated a $4.5 billion road maintenance backlog caused by decades of publicly subsidized road building to support commercial logging. In total, roughly 380,000 miles of roads were built across our national forests and surveys found that most were in serious disrepair				
239	Removing the Roadless Rule protections will lead to new roads and clearcutting that will cause soil erosion which may in turn, cause landslides. Additionally, soil erosion has effects on rivers in the area by allowing them to channelize and become straighter, thus speeding up the current. This can change the water chemistry and impact how these rivers and streams flood.				

CARA Concern Number	CARA Concern Text				
237	When road systems are connected to communities, the Forest Service should implement road density limits (no greater than 0.7 mile of open roads per square mile of forest) to reduce impacts associated with overharvest of important game and furbearing species in the area.				
236	Exempting the Tongass National Forest from the Roadless Rule will lead to increased development of roads, which will lead to increased commercialization in the area.				
234	Commenters stated that wildlife use roads.				
231	Exempting the Tongass National Forest from the Roadless Rule will lead to the development of new roads that will detrimentally impact ecosystems.				
347	Removing the Roadless Rule protections will allow for clearcutting and development activities that will have negative impacts on scenery.				
225	Development projects are not restricted under the Roadless Rule. Under the current Roadless Rule, exemptions can be made for individual development projects. Since January 2018, 57 projects including timber sales, mining projects, hydropower projects, geothermal leases and road reconstruction projects have all been approved within roadless areas with minimal review requirements, most of which within a month of submission.				
227	The Roadless Rule is preventing access and restricting development for local Alaskan communities. Road building and access to lands in the Tongass Forest are essential for development projects, such as mining, drilling and energy generation to be successful. The Roadless Rule restricts access needed for basic roads, access to health care, airports, energy transmission lines, renewable energy development, natural resource extraction (minerals, oil, etc.), recreational use, and infrastructure development. Because the Roadless Rule inhibits road development, it forces use of marine access which is rarely affordable or functional for the underdeveloped transportation and utility systems in the region. Marine access has a higher cost, lower dependability, and increased safety risk, making it unsustainable for the communities and businesses of Southeast Alaska.				
229	Exemption would allow road access to the congressionally authorized Southeastern Alaska Intertie System Plan Routes as identified in report #97-01 of the Southeast Conference. This includes roads for a community, municipal, or tribal government to connect isolated road networks and to access and develop water resources, renewable energy resources, sanitary landfills, subsistence resources, fish research and management and aquaculture facilities.				
78	Removing the Roadless Rule protections will lead to new roads that can increase access, enhance exploitation and further degrade the environment. Increased access for fishing, hunting, off-road vehicles, poaching, noise pollution and erosion will harm ecosystems within the Tongass National Forest.				
215	Resolutions were received from the following groups to support keeping Roadless Rule protections for the Tongass National Forest. Support for Alternative 1 and opposition to Alternative 6 were stated. Sitka Fish and Game Advisory Committee (Resolution No. 2019-2) City of Pelican (Resolution No. 2019-7) Affiliated Tribes of Northwest Indians (Resolution No. 19 - 58) Alaska Federation of Natives (Resolution No. 19-57; Resolution No. 19-61) National Congress of American Indians (Resolution No. ABQ-19-029) The Klawock Fish & Game Advisory Committee Organized Village of Kake (Resolution No. 2018-24) Municipality of Skagway (Resolution No. 19-32R) City Council of Tenakee Springs (Resolution No. 2020-07) Craig Fish and Game Advisory Council (Resolution No. 2019-1) Klawock Fish and Game Advisory Committee (Resolution No. 2019-1) Wrangell Cooperative Association (Resolution No. 12-16-19-02) The Community of Elfin Cove (Resolution No. 19-01) Tribal Council of Tribal Council of the Ketchikan Indian Community (Resolution No. KIC 19-29) Organized Village of Saxman (Resolution No. 2018-10-223) City of Gustavus (Resolution No. CY 19-31) Organized Village of Kasaan (Resolution No. OVK-19-10-001) The resolutions are summarized as follows. The Roadless Rule is important for protecting ecosystems that support and sustain Alaskan communities' economies, livelihoods, cultural traditions, as well as their overall health and well-being. This includes protecting the pristine environment to sustain healthy fisheries, watersheds, recreation and tourism industries, subsistence activities, endemic species habitat (including, but not limited to, Sitka black-tailed deer, salmon, wolves and birds) and intact old-growth habitat. Protections for ecosystem services such as air production, water and air purification, protection against invasive species, as well as climate change mitigation and resilience were also mentioned. Requests for maintaining the wild character of the Tongass National Forest to maintain the economic, social and environmental values of the area were made. The need to protect the environment and natural resources to preserve the inherent right to harvest for tribal traditional, as well as customary foods and resources was expressed. Concerns that the divisiveness of the proposed rule will tarnish the reputation of the area and negatively impact tourism were expressed. Concerns that the proposed				

CARA Concern Number	CARA Concern Text				
221	Resolutions were received from the following groups to support exempting Roadless Rule protections for the Tongass National Forest. City Council of Coffman Cove (Resolution No. 2002) City and Borough of Wrangell (Resolution No. 12-194503) The City of Whale Pass (Resolution No. 19-12-05-01) Ketchikan Gateway Borough (Resolution No. 2785) The resolutions are summarized as follows. The proposed rule would exempt the Tongass National Forest from the Roadless Rule protections that will provide more flexibility to handle uncertain future needs. Commenters said that the 2016 Forest Plan provides sufficient protections. Requests for relief from the Tongass Transition Plan were noted. Support for a revitalization of the timber industry, increased development and improved access, as well as economic support for mining, fisheries, recreation and tourism industries was also expressed.				
223	We received resolutions that were composed by the following groups in support of the Southeast Alaska electrical intertie and transportation corridor projects to promote regional economic development. Assembly of the City and Borough of Juneau (Resolution No. 1882; Resolution No. 2203) Assembly of the City and Borough of Sitka (Resolution No. 97-678) Council of the City of Wrangell (Resolution No. 06-97-679) City of Hoonah (Resolution No. 97-07-13) City Council of the City of Petersburg (Resolution No. 1490-R)				
157	Commenters provided supporting documentation such as pictures and maps.				
159	Content in the attachments provided were identical to the letter comment body.				
170	Commenters attached supporting technical documents such as proposed rules, rules, news articles, opinion articles, and scientific publications.				
172	Commenters provided links to scientific publications and news articles as a reference to support their comment. These references were linked within the comment body.				
84	Commenters supported keeping the Roadless Rule protections for the Tongass National Forest.				
146	Commenters supported a modification of various aspects of the rule, with the exception of full exemption.				
136	Commenters expressed support for exempting the Tongass National Forest from the Roadless Rule.				
147	Commenters did not state a preference for keeping the rule intact, exemption, or a change request.				
365	DEIS failed to analyze impacts the proposed rule will have on fish with the consideration of climate change. The DEIS improperly dismisses adverse climate change effects on southeast Alaska's fishery resources. The DEIS fails to analyze the potential cumulative effects of exemption including impacts to climate change that impact fishery resources.				
366	Commenters request more public meetings to be added. Commenters request that the Forest Service hold community education workshops regarding current protections of the Tongass Roadless Rule.				
367	DEIS needs to be updated to incorporate an analysis of the long-term secondary impacts the proposed rule will have on the Tongass and Chugach National Forests.				
368	The DEIS failed to analyze the environmental impact the proposed rule changes will have on the Chugach National Forest.				
369	Commenters express that the cumulative effects discussion in the DEIS is deceptive in saying that the "The amount of forest land in Southeast Alaska that is available for timber management has declined over the past century, largely due to Wilderness and LUD II designation by Congress, land selections by the State and ANSCA, land restricted by roadless designations, and land allocated to non-development LUDs in the current Forest Plan. This, along with mill closures and changes in timber markets, has contributed to a decline in timber harvest." The timber industry has been sustainably running operations for over 40-years and that the average market prices of Tongass timber has been rising for the past 20 years.				
370	The proposed rule change will result in activities that will increase fragmentation of the Chugach National Forest. The Chugach National Forest has value as an intact forest because it provides the necessary resources for jobs, subsistence, tourism, recreation, and protected habitat.				
371	Commenters stated that logging in the Tongass National Forest does not impact the tourism industry.				
372	Commenters expressed concern that logging activities in the Tongass National Forest will negatively impact recreational activities.				
373	Commenters expressed general opposition for logging in the Tongass and Chugach National Forests.				
374	Commenters expressed opposition to Alternative 2 because of concerns with opening protected areas to logging.				
376	Commenters express concern that proposed logging from exempting the Tongass from the Roadless Rule would lead to increased risk of wildfires.				
	Comment letters included introductory narrative and other information that was reviewed and noted with no further response required. Response: Examples of comments for which no further response will be provided are those unrelated to the decision being made, already decided by law, policy or regulation, beyond the scope of the proposal, conjectural in nature or not supported by scientific evidence, general in nature or position statements.				