

**ANALYSIS OF PUBLIC COMMENTS
ON THE BUSH ADMINISTRATION'S PROPOSAL TO
EXEMPT ALASKA FROM THE ROADLESS AREA CONSERVATION RULE**

In January 2001, the U.S. Forest Service adopted the Roadless Area Conservation Rule, a policy that protects roughly one-third – 58.5 million acres – of America's undeveloped national forest land from most commercial logging and road building. To date, the Forest Service has received **more than 2.5 million comments on the rule** – more than 95% in favor of complete roadless protection.

Despite a pledge to uphold the roadless rule, the Bush administration has worked to undermine roadless protections, including a recent proposal to exempt America's two largest national forests – The Tongass and Chugach rainforests in Alaska -- from federal roadless protection. The 17 million acre Tongass National Forest is the world's largest coastal temperate rainforest and home to centuries-old trees providing critical habitat for wolves, grizzly bears, wild salmon, bald eagles, and other wildlife. At the same time that the administration proposed exempting Alaska's national forests from the roadless rule, it also announced its intention to allow exemptions from the roadless rule in the lower-48 states.

A 45-day federal public comment period on the administration's proposed Alaska exemption closed on September 2, 2003. The public comments were logged and analyzed for the Forest Service by a Content Analysis Team (CAT) based in Salt Lake City, UT. During the week of October 6, 2003, a group from the Heritage Forests Campaign (HFC), an alliance of conservation and civic organizations, went to Salt Lake City to conduct their own review and analysis of the comments.

The resulting report presented here is based on HFC's own analysis of the public comments received on the Alaska exemption. The findings represent a summary of the content of those comments and the constituencies that presented them.

The Heritage Forests Campaign has tracked approximately 250,000 comments from Americans across the nation on the proposed Tongass and Chugach exemption. Of the 250,000 comments, less than 2,000 are in support of exempting Alaska from the roadless rule. HFC's analysis includes excerpts from some of the detailed and more extensive comments received by the Forest Service in support of the roadless rule, and some in opposition. Public comments received came in the form of detailed letters, hand-written letters, personalized e-mails, form letters and postcards.

SUPPORT FOR THE ROADLESS AREA CONSERVATION RULE

Members of Congress: 110 Democrat and Republican members of Congress wrote to the Forest Service in support of the 2001 Roadless Rule. They opposed exempting the state of Alaska from the rule.

Scientists: More than 50 prominent scientists from around the nation, many of whom have significant research experience in Alaska's Tongass or Chugach National Forests, expressed support of this protection policy, including: Richard D. Taber, Ph.D., Professor

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Emeritus, Forest Zoology and Wildlife Science, University of Montana; Victor Van Ballenberghe, Ph.D., Affiliate Professor, Department of Biology and Wildlife, University of Alaska Fairbanks; William Lidicker, Jr., Ph.D., Professor of Integrative Biology, Emeritus, University of California, Berkeley; and John Ratti, Ph.D., Research Professor, Department of Fish and Wildlife Resources, University of Idaho.

Outdoor recreation industry and groups: Outdoor Industry Association, representing hundreds of outdoor retailers from across the country, joined by representatives from Recreational Equipment Inc. (REI), LEKI USA, and National Outdoor Leadership School (NOLS) submitted comments opposing changes to the Roadless Rule.

Wood Products Industry: Home builder KB Home, office-supply retailer Staples Inc., and Hayward Lumber Inc., a major supplier of building materials, submitted comments opposing the exemption of Alaska from the roadless rule. These companies stated that they do not want or need timber from the Tongass National Forest.

Alaskan Business Owners : Twenty-five Alaskan businesses and tourist guides whose livelihoods depend on the preservation of Alaska's natural beauty and wildlife to attract tourists submitted comments supporting the rule, including: Bear Creek Outfitters, Gustavus Inn, Spirit Walker Expeditions, Glacier Guides, Inc., Old Harbor Books, Wilderness Inspirations, Alaska Wildland Adventures, Southeast Exposure, Kayaker's Cove, and Alaska Discovery. According to a recent report, "Recreation and tourism accounted for 4,278 jobs, more than five times the amount of jobs in the timber industry." (Taxpayer Losses and Missed Opportunities: How Tongass Rainforest Logging Costs Taxpayers Millions, Southeast Alaska Conservation Council, July 2003)

Former/current Forest Service employees: While many of the public comments came from across the country, a large portion came from residents living and working in Alaska. Among these letters, 25 were authored by current or former forests service employees.

Religious Leaders: Leaders from the United Methodist Church, Evangelical Lutheran Church, and multiple Christian ministers submitted comments in support of maintaining the rule.

Hunting and Fishing organizations: Numerous hunting and fishing organizations, including the Federation of Fly Fishers, Wildlife Forever, Izaak Walton League, Trout Unlimited, and the Wildlife Management Institute submitted comments that reinforced their interest in a national roadless policy.

Environmental and Government Watchdog groups: Scores of national, state and local environmental organizations and forest watch groups filed comments in support of the rule, including the Sierra Club, Natural Resources Defense Council, Defenders of Wildlife, Center for Biological Diversity, Taxpayers for Common Sense, Alaska Center for the Environment, Greenpeace, Alaska Coalition, The Wilderness Society, Forest Service Employees for Environmental Ethics, National Audubon Society, American Bird Conservancy, and The Wildlife Society.

Major Arguments in Support of the Rule

The organizations and individuals who submitted comments in support of the rule cited numerous reasons for keeping the rule as it was issued in 2001. These include:

The Roadless Area Conservation Rule is the result of the most extensive public rulemaking in history and enjoys overwhelming support from the majority of Americans.

“The American people have clearly communicated their wish to preserve the Roadless Rule as it was originally enacted. Despite this popular and sensible rule, despite a court ruling upholding the rule, and despite your Administration’s assertions to the contrary, your settlement with the State of Alaska suit and subsequent decisions severely weaken the core protections and safeguards of the rule, leaving our national forests subject to more harmful logging and development.”

-- *Letter from 110 Members of Congress, July 31, 2003, to Pres. Bush*

“I write as a Republican in demanding that the 2001 Roadless Rule be retained. There was a great outpouring which produced these rules. The present administration risks further alienation of environmental voters if it persists in attempting to change the Roadless Rule.”

-- *David Woolwine, State Secretary, New York State Republicans for Environmental Protection, Brooklyn, NY, RT 5563, August 9, 2003*

Wood-product businesses do not need or want timber from the Tongass forest.

“More than 2 million public comments have been submitted to the Forest Service to include the Tongass in the [Road less] Rule. Staples supports those comments and respectfully requests that the Forest Service put the Tongass off limits to industrial scale logging and road building. National treasures such as the Tongass are a national trust which must be preserved for future generations and we strongly believe that granting any exemptions will threaten that trust.”

-- *Mark F. Buckley, VP Environmental Affairs, Staples, RT 1602, August 8, 2003*

“We believe that our commitment to providing excellent and affordable homes can and should coexist with our commitment to protect the environment. The homebuilding industry and similar industries do not need wood from the Tongass. It is one of the last few remaining wild places in our nation. . . . KB Home believes that the Forest Service should heed the wishes of the American public—the ultimate owners of the Tongass.”

-- *Andrew Henderson, Director, Government and Public Affairs, KB Home, RT 1670, August 5, 2003*

“Hayward Lumber is an 84-year old, fourth-generation, family operated building materials dealer with seven locations on California’s Central Coast. With \$120 million in annual sales we are one of the 75 largest building material dealers in the United States. As much of our wealth is derived from forests, we see great value in preserving remaining roadless areas for their inherent ecological and aesthetic values—an interest we feel we share with the majority of Americans. While the Tongass and the Chugach National Forests represent some relatively easy pickings from a timber perspective, the building industry does not need or want to see this wood in our supply chain.”

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-- Steven Brauneis, Director of Sustainability, Hayward Lumber, RT 1667, August 8, 2003

The Roadless Rule is important to recreational businesses and their customers.

“We urge the Forest Service to uphold the Roadless Area Conservation Rule, without any reduction in the acreage of protected lands, as this ensures that these important recreational lands remain available to the American public. The rule also makes economic sense as recreation accounts for more than 85 percent of the revenue from National Forests.”

-- Michael Collins, Vice President Public Affairs, on behalf of Recreational Equipment, Inc. (REI), August 28, 2003

“Our customers range from adventure racers and avid hikers to seniors and children. And our products are used in roadless areas across the country. . . Wild places are the economic backbone of the \$18 billion outdoor industry. Protecting these places becomes increasingly important as our industry grows and local communities become more and more dependent on diversified economies. . . . LEKI believes that any change to the Roadless Rule as written in January 2001 are not in the best interest of our business, our customers, or the American public as a whole.”

-- Lindy Spiezer, Marketing Director, Trekking, on behalf of LEKI, August 28, 2003

Logging the Tongass Forest hurts the local tourism and fishing industry.

“I own a family operated, fly fishing business that employs 11 local residents each season. Both my business and those jobs depend on pristine wild areas and streams for their continued success, The Roadless Rule would safeguard many of the locations we presently use and that are enjoyed by some 1300 of our clients each season.”

-- Mark Kaelke, President, Bear Creek Outfitters, Juneau, AK, RT 3723, August 10, 2003

“I have lived in the Tongass National Forest with my family for over 20 years. We have been involved in commercial fishing, tourism, sport and subsistence hunting and fishing, camping, and boating. One can't live in the Tongass without becoming aware of economic realities. Though the timber industry has played a role, tourism, recreation, commercial fishing, and seafood processing are the mainstays of the non-government and services economy. These activities are heavily dependent on the intact, healthy watersheds in the wild old-growth forests that the original Roadless Rule was designed to protect. Unchecked industrial-scale clearcut logging could easily be destructive to the tourism and fishing industries that sustain the communities in and around the national forests of Alaska.”

-- Alice C. Hanson, Sitka, AK, RT 2057, August 10, 2003

The vast majority of scientific evidence supports the permanent designation of roadless areas.

“During the Tongass Land Management Plan Revision, the Forest Service convened several expert panels to evaluate the conservation effectiveness of the plan and its alternatives. The brown bear panel recommended that the Forest Service should retain unroaded watersheds in a roadless condition to maintain refugia for bears. The expert panel on wolves raised significant concerns about road management and increased

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mortality of wolves. The fish experts also expressed concerns about road construction and its effects on spawning and rearing habitat for anadromous salmon. It has been consistently demonstrated that roadless areas are crucial to the protection of our nation's wildlife, fisheries and water resources. There is no scientific basis to exclude the Tongass or Chugach National Forests from the Forest Service's national roadless policy.

In our professional judgment, both the Tongass and the Chugach should remain an integral part of this important national policy. This policy is based on a solid foundation of science and will do much to safeguard the ecological integrity of Alaska's coastal forest ecosystem."

--*Comment from 20 scientists who helped develop the Tongass Forest Plan, RT 2064, Resent [??] from - June 20, 2003*

"I live in Sitka, Alaska, in the middle of the Tongass National Forest. . . . I am a plant ecologist doing research on non-native invasive plants in Southeast Alaska. The results are clear. Invasive plants come with roads—either in the tires of cars/logging equipment or in the hay balls or in the seed mixes used against erosion along the roads. The more roads we build, the more invasive plants will have opportunities to move into Southeast Alaska."

-- *Nanna Borscheif, Sitka, AK, RT 4543, July 8, 2003*

Unroaded forests are essential for the viability of salmon fisheries.

"As a former commercial fisherman and fisheries biologist, I can attest to the extreme importance of a non-roaded, non-commercially logged Tongass for the long term health and viability of the salmon fisheries in this area. In the long-term, fisheries and ecotype tourism will present a much more economically bright picture for the residents of Alaska and the US."

-- *Mark Robertson, Juneau, AK, RT 695, August 29, 2003*

"According to the Alaska Department of Fish and Game's Tongass Road Condition Survey Report of June 2000, 66 percent of culverts on salmon streams do not meet basic fish passage standards. Inadequate road construction and maintenance has resulted in direct impacts to fish streams through erosion, sedimentation, landslides and impassable culverts."

-- *Kenneth Duckett, ED United Southeastern Alaska Gillnetters representing 500 small business owners who catch salmon by driftnetting in Southeastern Alaska, RT 2972, August 9, 2003*

"As a permanent forest service employee who works on the Tongass National Forest I am ashamed of you and your administrations attempt to overturn the January 2001 Roadless Rule. As a professional fisheries biologist I am disillusioned at your apparent disregard of comments of the Alaska Chapter of the American Fisheries Society, a chapter of the oldest professional fisheries organization in North America, that supported the 2001 Roadless Rule.

-- *James M. Beard, Thorne Bay, AK, RT 5649, September 1, 2003*

"I spent 11 years as Deputy Division Director in the Alaska Department of Fish and Game and can tell you from first-hand experience that anyone who says there are no

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problems maintaining wildlife and fish populations at historic levels in clearcut areas isn't telling you the truth."

-- Bruce H. Baker, Auke Bay, Alaska, RT 2962, August 19, 2003

The \$8.4 billion roads maintenance backlog should be addressed before building new roads in National Forest roadless areas.

"Losing about \$30,000,000 a year on timber sales in the Tongass amounts to nothing more than corporate welfare. I am sick and tired of seeing my tax dollar being wasted on corporate welfare while damaging the fish runs and deer habitat that I depend on."

-- Ward Eldridge, Sitka, AK, RT 4468, August 10, 2003

"Wildlife Forever is the nonprofit conservation arm of the North American Hunting Club and North American Fishing Club who together have 1.3 million members. . . . In short, the value of intact natural resources of the Tongass' roadless areas greatly exceeds the value of these forest tracts for logging. The dismal record of timber road culverts becoming fish impassable and the mindless pattern of spending taxpayer subsidies to clearcut towering old growth trees flies in the face of sound forestry and America's wildlife legacy."

-- Douglas H. Grann, President & CEO, Wildlife Forever, Brooklyn Center, MN, RT 2060, August 12, 2003

"There are road projects going on in the Tongass that even the USFS engineers in charge are shaking their heads at. There is no timber market to support such infrastructure so in essence it is corporate welfare. As a fisheries biologist, commercial fisherman and sawmill operator, I speak on behalf of myself and the members of the Yakutat Salmon Board, that we are against rescinding the Roadless Area Conservation Rule for the Tongass and our fellow fisherman in the Chugach National Forest."

-- Bill Lucey, Coordinator, Yakutat Salmon Board, Yakutat, AK, RT 2414, August 11, 2003

"Opening up these roadless areas to logging does not make sense economically. For more than five decades, the timber-cutting program on the Tongass National Forest has lost more than half a billion dollars—\$558.7 million between 1982-1998 alone."

-- Laura Turner Seydel, Atlanta, GA, RT 6049, August 28, 2003

"As a geologist, I have worked on projects where road building and logging have wantonly destroyed native forests. There was no attempt to selectively log (as they were supposed to do), there was no attempt to minimize erosion and other effects on the surrounding land. These contractors often call themselves "conservatives" but all they really want is to steal from the American taxpayers. I, for one, am sick of it."

-- Sarah Hoffman, Corvallis, OR, RT 5958, August 8, 2003

The Roadless Rule preserves our nation's natural heritage for future generations.

"I'm a Republican, and I'm appalled. Since Theodore Roosevelt began building a vast heritage of parks, forests and wildlife refuges, Republicans have been the party of the conservation tradition and sound environmental protection. What this administration is doing—and proposes to do—is a travesty."

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-- Elizabeth Hurst-Waitz, Albuquerque, NM, RT 4434, August 25, 2003

“I plan to enjoy Southeast Alaska during my remaining years. I want my 7-year-old daughter to be able to see and experience the wonders of our rainforest. Do not let the logging industry take that away from us. Let us treasure what we have now, and pass it down to the future generations that will follow.”

-- Jeffery Wilson, Juneau, AK, RT 3661, July 16, 2003

“For the sake of our children, our grandchildren and their grandchildren, please protect these forests in their pristine way. We have altered and destroyed enough. If we are so consumed by our immediate desires of consumption and money that we destroy the landscapes and habitats that belong to future generations, we will not be seen as great leaders but as a generation that should have known better, yet got greedy.”

-- Molly Doran, Bow, WA, RT 6831, August 12, 2003

Americans are frustrated their opinions and comments are being ignored.

“As one who has participated in this process for years, both in written comments and public hearings, I strongly support the Roadless Rule. As such, I am vigorously opposed to any exemptions within this country’s largest national forests—the Tongass and the Chugach. As our only temperate rainforests, these areas deserve protection for the species they harbor and the ecological services they provide. The proposed exemptions are unconscionable and unacceptable to the people of this union who value our public lands.”

-- Tim Hogan, Boulder, CO, RT 1010, July 29, 2003

“2 million of us wrote on to support the Roadless Area Conservation Rule of 2000. I suspect the current administration’s policy is to wear us down. Sooner or later one of these years we’ll be too exhausted to resist and let the clearcut corporate welfare bums have at our last remaining national treasures for the benefit of the tax free few at the top. Wrong: We shall continue to say NO.”

-- Larry Spencer Severson, Sitka, AK, RT 2353, August 13, 2003

“It is ridiculous that thousands of taxpayers letters of opposition keep getting disregarded and this matter keeps coming up every six months.”

-- Indra Lowenstein, San Francisco, CA, RT 1871, August 5, 2003

The Bush administration should keep their promise to uphold the Roadless Rule.

“Just over two years ago, Agriculture Secretary Anne Veneman said, ‘providing roadless protection for our national forests is the right thing to do, and because it’s the right thing to do, it’s important to do it right, for the land, for people, for communities, for states, and for the country as a whole.’ I strongly agree and urge you to embrace and implement the Roadless Rule as it was issued in January, 2001.”

-- Elizabeth Moorehaed, Eagle River, AK, RT 1871, August 13, 2003

“I am writing to ask you to call upon the Bush Administration to keep its publicized promise to uphold one of the most significant forest conservation policies in decades, the Roadless Area Conservation Rule.”

-- Kenneth A. Wyberg, Minneapolis, MN, RT 6057, September 2, 2003

Roadless areas should be protected as part of God's handiwork.

"I am a pastor in the Evangelical Lutheran Church of America, and have served three different congregations in Alaska. Many of my people share my view that the wild resources of this world are a gift from God which requires our careful and loving stewardship. We must not run more roads into the Tongass, the cost to our children and to our own spirits is too high."

-- *Jeffery Merkel, Fairbanks, AK, RT 6962, August 29, 2003*

"So many scoff at the plight of those who would protect the Earth, believing that the Earth was given to them to do with it as they wish. This is a grave misconception for within Genesis 2 we see that God made man in order to take care of it. 'The Lord God took the man and put him in the Garden of Eden to work it and take care of it' (Genesis 2:15)."

-- *Rev. Russell Noland, Fresno, CA, RT 5681, August 7, 2003*

Alaska's Tongass National Forest is America's largest rainforest – our crown jewel.

"The Tongass and the Chugach are crown jewels in the national forest system, home to awe inspiring landscapes, undamaged ecosystems, and world class recreational opportunities. Proposals to spoil these treasures with roads and logging ignore the wishes of the vast majority of American's like me who support the protection of roadless areas in all of our national forests."

-- *Theodore Cochrane, Madison, WI, RT 6077, August 7, 2003*

"The United States has repeatedly taken Central and South America to task over their dwindling rainforest resources. So it's more than fitting that we take steps to protect our own. . . . I urge you to do all you can to quell the proposed exemptions, and to protect these precious national *resources*."

-- *Doug Crichton, Vice President / Editor, Health Magazine, Birmingham, AL, RT 101, July 30, 2003*

"I am a conservative voter, with a dilemma on my hands....You don't have to be a Democrat or a liberal to appreciate the beauty of America's remaining wild lands. This massive giveaway of the magnificent forests that belong to all the American people for the shortsighted, short-term gain of some Bush cronies is anti-conservative and un-American."

-- *Andrew May, Emmitsburg, MD, RT 7098, August 25, 2003*

OPPOSITION TO THE RULE

Comments that opposed the roadless rule as it was originally issued represent a minute fraction of the comments that were submitted. Major criticism of the rule came from Alaska elected officials, the logging industry, developers/engineers, Alaska business owners, foresters, Alaska residents and other citizens.

Major Arguments in Opposition to the Rule

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The comments filed by organizations and individuals opposing the rule cited a number of arguments to support their position. These included:

The Roadless Rule violates the Alaska Wilderness Act.

“The Roadless Rule violates a number of federal statutes. ANILCA [spell out] sets aside millions of acres in Alaska from development with the understanding that there would be no more land withdrawals. ANILCA struck a balance between protected areas and areas managed for multiple use. . . . Private industry can not be expected to pursue opportunities if there is a real risk that stumpage volume will be greatly reduced within the next few years.”

--Peter M. Huberth, *Forest Industry Consulting, Juneau, AK,*

“Resolution 04-03, adopted by the Southeast Conference, August 6, 2003:

WHEREAS, application of the Roadless Rule to Alaska national forests violates the “no more” clause of the 1980 Alaska National Interest Lands Conservation Act, which divided conservation and development lands and stipulated no more land would be set aside for conservation . . . The Southeast Conference strongly supports exclusion of the Tongass and Chugach national Forests from the U.S. Forest Service National Roadless Rule.”

-- Meilani Schijvens, *Administrative Director, Southeast Conference¹, Juneau, AK, RT 2059, August 11, 2003*

“Invoking a Roadless Rule in the Tongass or Chugach National Forests is impractical and contrary to the Alaska National Interest Lands Conservation Act of 1980, which specifies that no more wilderness areas will be created in Alaska without congressional consent. Applying the Clinton Roadless Rule to the Tongass creates a wilderness in excess of 5,000 acres. Current management plans and the geographic location of the forests provide sufficient protection while allowing reasonable multiple uses of the forests. Invoking a Roadless Rule cripples or eliminates some of the multiples in multiple uses.”

-- Lew M. Williams, Jr., *Ketchikan, AK, RT 2058, August 12, 2003*

The Roadless Rule will hurt the economy.

“The Kenai Peninsula Borough has a long history of opposing any attempts to deny our citizens reasonable access to the many resources of the Chugach National Forest. . . . There are no sound scientific reasons to impose such a rule and only bad results for our economy and communities if the Chugach National Forest is not exempted from this rule.”

-- Dale L. Bagley, *Mayor, Kenai Peninsula Borough, Soldotina, AK*

“The Roadless Rule locks up the Forest and does not provide for a well-balanced approach to forest management. Proper management of the Forest will boost our Nations struggling economy, utilize the old-growth forests instead of letting them fall over and

¹ Southeast Conference is a regional membership organization representing more than 100 groups, including: 30 communities, 10 Southeast Alaska chambers of commerce, 10 Alaska Native organizations, many businesses, non profits, visitor’s bureaus, and individuals.

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rot, and enhance wildlife habitats. Road building throughout Alaska has stimulated the State economy and benefited those who hunt, fish, hike, camp, and recreate.”

-- Carl H. Harmon, *Environmental Engineer*², Anchorage, AK, RT 2026, August 11, 2003

“We support the decision by Judge Brimmer on the Clinton Roadless Area Conservation Rule that this rule should be set aside.

“People all across America that access public lands are forming groups to combat these extreme environmental groups from having a chock [sic] hold on our land managers forcing them to make decisions that affect our way of life in our communities not only historic recreational access but economic consequences in already depressed areas that are now forced to depend on tourism.”

-- Don Capparelli, *President, National Independent Trail Riders Organization (NITRO)*,³ Osburn, ID, RT 2009, August 13, 2003

The Roadless Rule Violates the 1990 Tongass Timber Reform Act.

“The Roadless Rule also violates the promise in the 1990 TTRA, which says that the Forests Service will seek to meet the demand for timber for the industry in Southeast Alaska. The 1997 Tongass Land Management Plan reduced the potential timber sale volume from 520 mmbf [million metric board feet] annually to 267 mmbf. There is no way to implement that revised management plan if half of the remaining available timber is placed off limits. The Roadless Rule ignores the land management planning process. The Forest Service spent millions of dollars and took more than a decade to complete the forest plan revision. It should be implemented and that process is the proper way for the Forest Service to make future land allocations.”

-- Owen J. Graham, *Executive Director, Alaska Forests Association, Inc., Ketchikan, AK, RT 4690, August 14, 2003*

Roads are necessary for forest management.

“As Bernard Fernow, America’s first forester, stated in the 19th century, “You manage forest with an axe.” Today, I am sure he would also add it is necessary to get to the area to be managed, and there is no better way, than a well designed, constructed and maintained road.”

-- Terry T. Brady⁴, Anchorage, AK, RT 936, August 1, 2003

Access should be restored to all National Forests as should access to mining claims.

“Coeur Alaska supports the proposed rulemaking, which would permanently exempt the Tongass and Chugach Forests from the Roadless Rule. The rule should be modified to restore access to all National Forests. The current rule ignores existing forest plans and years of scientific analysis. It does not provide reasonable access to patented and unpatented mining claims, is poorly conceived, and has no well-conceived objectives,

² Mr. Harmon is manager of environmental engineering with the Chugach Electric Association.

³ NITRO is described as “a voice against the Sierra Club and the other anti-access or so called environmental clubs of that nature.”

⁴ Brady is managing member of Huskywood Services, which hopes to convert trees damaged by spruce bark beetle and “forest thinnings from the Southeastern Alaska Panhandle” into commercial fuel.

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other than to sidestep existing comprehensive environmental review processes already in place.”

-- Robert T. “Rick” Richins, Senior Vice President, Coeur Alaska,⁵ Juneau, AK, RT 2369, August 14, 2003

A local national forest land planning process should replace the Roadless Rule.

“The more recent decision of Judge Brimmer to enjoin the Roadless Area Conservation Rule should give rise for the Forest Service to immediately set aside the “roadless” rule. Any and all restrictions placed on National Forest land management activities could then only through the preparation and approval of the local National Forest land management planning process and not by a one-size-fits-all national mandate that continues to cost the American taxpayer untold millions of dollars.”

-- Randy Shipman, President, Rocky Mountain Region People for the USA
Rock Springs, WY, RT 2062, August 11, 2003

Application of the roadless rule will eliminate stewardship activities unlike the proposed Tongass exemption.

“Application of the existing Roadless Rule to the unroaded Tongass and Chugach National Forest will effectively eliminate most stewardship activities as well as opportunities for economic development. Exemption of Alaskan national forests from the Roadless Rule will not imperil these forests. Both are currently managed to preserve their wild character while providing for a range of multiple use activities. Chugach [Alaska Corporation] strongly supports exempting the Tongass National Forest from the existing Roadless Rule by adapting the proposed Tongass exemption.”

-- Rick Rogers, Vice President, Lands, Resources, and Tourism, Chugach Alaska Corporation,⁶ Anchorage, AK, RT 2067, August 8, 2003

The Roadless Rule would have long term social and economic consequences.

“We support the proposed rulemaking to permanently exempt the Tongass and Chugach national forests from the Roadless Rule. The Roadless Rule is one of the most anti-access, anti-recreation, anti-forestry, anti-tourism, and anti-multiple use actions ever undertaken. Application of the rule in the Tongass and Chugach would have long term social and economic consequences on public access, transportation, tourism, power transmission grids, recreation, mining, forest health and other legitimate public uses.”

-- Thom Seal, P.E.,⁷ Elko, NV, RT 2034, August 11, 2003

⁵ Coeur Alaska, Inc. is a major mining company in the state.

⁶ The CAC is one of 13 Native American corporations formed by Congress to replace the reservation system.

⁷ Thom Seal is an engineer with Newmont Mining Company in Reno, Nevada.