



ROADLESS RULE PUBLIC COMMENT WRITING GUIDE

Thank you for your interest in submitting public comments to the Forest Service about the Roadless Rule on the Tongass National Forest.

Over the next year, the Forest Service will draft alternative versions of a state-specific Alaska Roadless Rule that would replace the 2001 national Roadless Area Conservation Act (Roadless Rule) on the Tongass National Forest. This is our chance to shape the options the Forest Service will propose for how Roadless Rule protections will apply to the Tongass National Forest going forward.

The Forest Service will take your comments into account when producing the Draft Environmental Impact Statement (DEIS) for how Alaska's new Roadless Rule will impact the Tongass National Forest.

In order for your comment to be effective, the Forest Service says that all comments should: **(1) be specific, (2) provide a rationale, and (3) include both a geographic and activity component.** This means that form letters are *not* an effective commenting method. In order to be effective, your comments should be unique and include all the necessary components.

With all of this in mind, we have created the following guidelines for you to use when drafting your comments.

YOUR COMMENTS MUST BE SUBMITTED BY OCTOBER 15 AND SHOULD FOLLOW THIS FORMULA:

In order to be as effective as possible, your comment should address each of the following:

- 1. Management Summary**
- 2. Geographic area**
- 3. Rationale**
- 4. Activities**
- 5. Ask - what you think the FS should focus on going forward**

1. MANAGEMENT SUMMARY: What should the new Alaska Roadless Rule look like for the Tongass?

Ultimately, the Forest Service wants to know what you think about how they should manage the Tongass National Forest. Your suggestions can range from:

- If you want to maintain the status quo and keep the 2001 national Roadless Rule in effect on the Tongass:
 - “Keep the 2001 Roadless Rule restrictions in place.”
 - “I support a no-action alternative.”
- If you want the new Alaska Roadless Rule to increase the restrictions on development in the Tongass:
 - “Make the Alaska Roadless Rule MORE restrictive than the 2001 national rule regarding development activities (no mining, hydro, geothermal, etc).”
- If you want the new Alaska Roadless Rule to allow certain, specific development projects:
 - “The Alaska Roadless Rule should allow certain activities in certain areas.” (Examples: hydropower project between Hoonah and Pelican; young growth timber harvest in roaded roadless areas, etc)

2. GEOGRAPHIC: WHERE do you want the Alaska Roadless Rule to apply within the Tongass? *The new Alaska Roadless Rule could open up currently protected areas to old growth timber harvest and road building, so it is important to name specific places you want protected in any new rule.*

- Tongass-wide: "I want the new Alaska Roadless Rule to protect all inventoried roadless areas on the Tongass currently protected under the 2001 Roadless Rule, including roaded roadless areas."
- Areas around Sitka: "The new Alaska Roadless Rule should protect all inventoried roadless areas on Baranof Island and Chichagof Islands currently protected under the 2001 Roadless Rule."
- Specific areas closest to Sitka: "I want the new Alaska Roadless Rule to protect the inventoried roadless areas on and around Baranof Island, especially the watersheds in Ushk Bay, Poison Cove, Silver Bay/Salmon Lake, Nakwasina Passage, Northern Kruzof, Katlian River Watershed, Fish Bay, Kizuchia Creek, Starrigavan, Rodman Bay, Appleton Cove, Sitkoh Bay/Lake/Creek, Hoonah Sound, Upper Tenakee Inlet, Kelp Bay, and Catherine Island."
- ***Are there other specific places on the Tongass that are important to you? Name them!***

3. RATIONALE - WHY do you care about these places? What do you use them for?

- “These lands support healthy salmon populations.”
- “This place is a designated [Tongass 77](#) top salmon-producing watershed.”
- “The new Alaska Roadless Rule should include all [T77 watersheds and TNC/Audubon ecological priority areas](#) that are currently not in inventoried

roadless areas. These areas should be protected from old growth harvest and roadbuilding.”

- “These are great hunting grounds and habitat for Sitka black-tailed deer.
- “I love to recreate and enjoy nature in these areas.”
- “These areas are essential for the fishing and tourism economies in Southeast Alaska and should not be logged or developed.”
- “As a business owner (fisherman, wildlife tours, bear guide, recreation retailer, charter fishing, etc), I make my living from the wildlife, salmon, fish, and scenery that this area supports.”
- “I’ve witnessed and experience the ecological importance of this area and I want it to stay this way without any long term human footprint/development.”
- “The Tongass is important to me because it is the most important national forest for carbon sequestration and climate change mitigation.”
- “I value the wild public lands in this area. The Tongass is a national and cultural treasure for all Americans.”
- “The Tongass is one of the last temperate coastal rainforests in the world. These are unique places that should remain pristine.”
- “I’m concerned about our growing state and national deficit and I don’t think building roads in these areas to subsidize the timber industry is a fiscally responsible use of taxpayer dollars.”
- “I stand in solidarity with tribal sovereignty. These inventoried roadless areas are the traditional and unceded territory of the Tlingit, Haida, and Tsimshian people and should be preserved for customary and traditional use by tribal citizens and rural subsistence harvesters.”
- ***Are there any other reasons for why you care about these areas of the Tongass? Make sure to include them!***

4. ACTIVITIES: WHAT do you think **SHOULD and **SHOULD NOT** be allowed in these areas? You *CAN* suggest activities that may be currently restricted under the 2001 Roadless Rule. If you think an activity is appropriate in certain places, but not others, explicitly say so.**

- Low-impact recreation, including hiking, hunting, camping, foraging, etc.
- Building recreation infrastructure, including cabins, trails, mooring buoys, 3-sided emergency shelters, etc.
- Active watershed, stream, and habitat restoration (stream restoration and wildlife habitat restoration e.g. thinning) in degraded habitat areas, especially those that have seen past logging activity
- Hydropower development
- Geothermal energy development
- Mining
- Inter-tie/transmission lines
- Utility corridors
- Roadbuilding
- Road reconstruction

- Old growth timber harvest
- Young growth timber harvest
- **Are there any other activities you want/don't want to see happen?** Research stations? Visitor centers? More recreation or visitor infrastructure? Mention it!

5. ASK the Forest Service for specific things you want to see happen on the Tongass. *What should the Forest Service prioritize instead of building roads and harvesting more old growth?*

- “The new Alaska Roadless Rule should include all [T77 watersheds and TNC/Audubon ecological priority areas](#) that are currently not in inventoried roadless areas. These areas should be protected from old growth harvest and roadbuilding.”
- “The Forest Service should focus their resources on active watershed restoration activities rather than further old growth timber harvest.”
- “The Forest Service should work on maintaining the current road system in the Tongass before they build any new roads.”
- “The Forest Service should invest in more workforce development programs and train Alaskans young and old to monitor and restore degraded watersheds, among other forestry and land management skills.”
- “The Forest Service should focus on continuing the Tongass transition to an economy based on sustainable young growth timber products instead of old growth logging.”
- “The Forest Service should hire more people to process local outfitter/guide permits in order to support the visitor industry on the Tongass.”
- **Possible studies the Forest Service should conduct before a new Alaska Roadless Rule is implemented:**
 - “The Forest Service should conduct a comparative analysis of regional revenue and employment from commercial fishing and visitor industries versus timber industry.”
 - “The Forest Service should conduct a study on the socio-economic impact of subsistence hunting and fishing for Southeast residents.”
 - “The Forest Service should produce a report on opportunities/possibilities for the Tongass to participate in state, national, and/or international carbon credit programs.”
 - “The Forest Service should complete a comprehensive inventory of all old growth stands left on the Tongass BEFORE any further logging and/or roadbuilding occurs.”
 - “The Forest Service should conduct a comparative analysis of the costs of roadbuilding versus timber revenue receipts and publish the results publicly.”
 - “The Forest Service should conduct a quantitative assessment of the socio-economic benefits of carbon sequestration.”

- “The Forest Service should conduct a comprehensive comparative analysis of the value of old growth forest stands left living vs when they are cut down (for example, carbon sequestration vs timber product).”
- “The Forest Service should conduct a feasibility and economic analysis of road travel versus marine vessel travel within the Tongass National Forest.”
- **What do you think the Forest Service should do or study? Tell them!**

When it all comes together, it should look something like this example:

I want the areas that are currently roadless around Sitka and Northern Baranof Island to remain in the same roadless classification as delineated by the 2001 Roadless Area Conservation Act. Do not allow roadbuilding for old growth timber harvest, road building or reconstruction, powerline corridors, or mines. These areas are very important habitat for fish and deer that I subsistence harvest to feed my family. I also like to go hiking here and I don't want to see clearcuts or roads when I explore the wild. I want the FS to examine the value of these trees on the stump vs their value cut down. I also think the FS should conduct a study to examine how much carbon the Tongass sequesters annually and the impact this has on local climate change adaptation.

Public comments are due by October 15th. You can submit your comments [here](#) or at the [official Roadless commenting portal](#). You can also comment through this [story map](#), which allows you to pinpoint an area on the map and comment directly on that area.

We hope these guidelines help. Additionally, come to our office at 201 Lincoln Street (upstairs above Old Harbor Books) for comment writing assistance any week day from 2-4 pm. If you need to schedule an additional time or have any questions, please contact Katie Riley at katie@sitkawild.org or (907)747-7509.

Please forward this guide to any and all family or friends who you think would be interested in standing up for the Tongass and submitting their own public comments.