

USDA Forest Service
Attn: Alaska Roadless Rule
P.O. Box 21628
Juneau, Alaska 99802

Date submitted: 12/14/2019

RE: Comments on Draft Environmental Impact Statement (DEIS) and Department of Agriculture proposal to exempt the Tongass National Forest from the national Roadless Rule Conservation Protections

Alaska Roadless Rule Team:

This letter clarifies and further addresses my previous comments submitted on November 4, 2019 regarding the Draft Environmental Impact Statement the US Forest Service developed pertaining to proposed changes to existing Tongass National Forest Roadless Area Conservation protections.

My name is James Clare and I live in Sitka, Alaska. I moved to Juneau in September 1977, taking an environmental engineer job with the Alaska Department of Environmental Conservation. My responsibilities included: permitting tasks related to waste discharges from largest industrial to the smallest individual entities; agency participation and input on federally permitted Alaska projects and environmental impacts from such projects; significant development of regulations pertaining to water quality and waste disposal; visiting communities and remote locations, including logging operations, to obtain public and industry input on proposed regulations, view environmental impacts reported by the public, with many needing attention, and often developing methods to correct impacts to community or the remote environment; and coordinating my responsibilities with other environmental impact and protection programs, such as solid waste, contaminated sites, hazardous spills and clean-up, and air pollution maintenance and control.

I eventually received assignment to the Sitka District Office of ADEC and intimately witnessed the former Southeast Alaska large scale logging and its support systems of 1970s through 1990s. That logging, support footprints, and road building was more horrendous than people today can imagine. Despite clean-up efforts conducted by the Forest Service, especially around remote logging camps, logging roads, and service areas, and after the end of pulp mills and large industrial logging, contaminants remain in many places, some within a variety of site-specific containment methods now getting quite old and nearing their functional life.

Since 1979 I've owned a remote property and built a cabin. I skiff to my cabin 140 miles from Sitka, through six inside passage straits, past vast forests of both untouched and still very obviously, and very clearly, cut-to-the-ground varieties. Much debris still remains in former logging impacted areas. Often I must take

great care selecting vessel anchoring or I must choose alternative and sometimes less reliable anchoring due to submerged debris in protected coves and bays. Many decades later, previously logged areas and roads still pose very difficult or impossible foot passage for hunting, fishing, camping, or hiking.

I fish, sometimes hunt, hike daily, harvest plants and berries, explore, and love Southeast Alaska. Our children similarly use and depend on our forest even more than I do. I would like any grand-children of mine, or anyone else's, to be able to benefit from advantages from the Tongass National Forest.

These advantages include:

- removal and storage of at least 8%, and most likely more, of the atmospheric carbon dioxide emitted by the United States [1.], an enormous amount of carbon, relative to the entire national forest system;
- a diversity of marine and terrestrial life like very few places on our planet;
- people's livelihoods benefiting not only residents but millions of visitors too; and
- excellent air and water quality.

These are my primary values for the Tongass National Forest, but I also share the many others expressed in other comments on the proposed rule change and Draft Environmental Impact Statement (DEIS) [2.].

More specifically, **US Forest Service publications recognize that Tongass National Forest soils sequester more carbon than the vegetation** [3., 4., 5.]. **The DEIS does not address this issue, or any benefits of Tongass carbon sequestration, or climate change mitigation, or impacts occurring on the Tongass due to changing climate.** Stream temperatures are increasing, drought occurred for over a year during 2018 and 2019 in Southeast Alaska and the Tongass [6.]. Changing climate is recognized as the greatest threat to human habitation and welfare on our planet [7., 8., 9., 10.]. Kicking this can down the road by further ignoring it and promoting practices that demonstrably cause damage to the environment represent very unwise judgment and crimes against humanity.

Listen to the young people speaking out loudly about their future on the earth we leave them.

My purpose for preparing these comments on the Department of Agriculture proposed changes and the Alaska Roadless Rule DEIS (AKRR DEIS) relates my concern with how the proposed rule change alternates 2 through 5 and especially the proposed full exemption alternate 6 will impact my life; my family, friends and neighbor's lives; and our collective environment. **Only alternate 1, No Action, offers the best protection and conservation opportunities that I and the**

majority of my fellow citizens value, as intended by the national roadless rule. Under alternates 2 through 6, significant impacts would occur to my and my family's fishing and hunting, subsistence harvesting, foraging for wild foods, our peace and solitude we find in nature, our recreation, our cultural values and practices, and our reasons for living here. We recognize the Tongass as a national and global treasure. The Tongass forest has a substantial ability to sequester carbon and mitigate climate change impacts, as many forest service and independent studies and documents indicate. We need to begin better conservation of natural resources for future generations, rather than use as much as possible as soon as possible for quick economic gain by the select few. I and my family, our friends and neighbors, and most Southeast Alaska residents depend on roadless areas in the Tongass National Forest for our livelihood; healthy fish and deer habitat for our subsistence hunting, foraging and gathering wild foods; practicing culture; recreating and enjoying nature; viewing wildlife; keeping public lands wild for future generations; fiscal responsibility and saving taxpayer dollars; and, of extreme importance, we value Tongass carbon sequestration and climate change mitigation.

I am also very concerned about the methods, procedures and course of action chosen by the Department of Agriculture to enact changes as proposed by the DEIS. The proposal came from people who do not live in Southeast Alaska, with the primary proponents living in areas far removed from Alaska, under very different social, political, and economic value systems. The decision to exempt the Tongass from the national Roadless Rule is a political policy directive. I fear the proposed changes could occur by not considering Southeast Alaska resident values at all, without regard to the overwhelming majority opinion and wishes. Therefore, the entire rule change methods and procedures represent an undemocratic initiative that is unfair and most likely illegal.

The primary requester of record is Agriculture Secretary Sonny Perdue. Mr. Perdue is a Georgia farmer and veterinarian with experience in crop and livestock agriculture and veterinary care. His expertise does not include forest management. He also has considerable experience as a politician. Secretary Perdue also has the responsibility for making the final decision on any proposed Tongass Roadless Rule change. How legally and ethically can a person request a significant change and make the final decision on the same change? Without appropriate knowledge and experience, and because of the political nature of the request and expected final decision, Secretary Perdue must recuse himself from participation in any final decision.

However, of the alternatives described and provided in the AKRR DEIS, I emphatically support and endorse only alternative 1, no action. It best represents the will of the people nationally and locally, based on comments posted by the Forest Service on the AKRR project website [2].

The roadless rule on the Tongass National Forest is working fine as it is,

and, for the most part for more than eighteen years has been successfully balancing the conservation of our fish and wildlife habitat, our forest resources, and diverse business and industries with important development projects. It also represents the safest protections against climate changes, not only in Southeast Alaska but also globally.

A full exemption especially and any partial exemptions represented by alternates 2 through 5 fail to offer adequate protection of my values as a resident of Southeast Alaska for more than 42 years. Alternatives 2 through 6 also fail to protect Tongass Forest values important to current industries, businesses, and users. Only alternative 1 offers the best opportunities to effectively balance economic development and conservation characteristics in roadless areas. Alternative 1 also offers the best local decision-making opportunity for Tongass Forest management uses. Alternatives 2 through 6, but particularly the DEIS preferred alternate 6, would change the existing Roadless Rule to allow increased logging and road building, negatively impacting the Tongass environment, both physically and socially. Such changes would severely impact all I and many others value about the Tongass Forest, our uses, and our dependence on the forest to provide for us.

The Roadless areas on the Tongass that are especially important to me are those on or around Baranof Island and Chichagof Island, the mainland Chilkat Range north of Icy Strait and along the West shore of Lynn Canal and further West to Glacier Bay National Park, all of Admiralty Island including Mansfield Peninsula, the entire mainland West of the Canadian border with Southeast Alaska including areas around Juneau and the central mainland from Hobart Bay to Stikine River and the southern mainland from Bradfield Canal to Dixon Entrance, Kupreanof Island, Kuiu Island, Wrangell and Etolin Islands, Prince of Wales Island, Revillagigedo Island near Ketchikan, Yakutat forelands, and all of the inventoried roadless areas on the Tongass. I humbly request the roadless areas in these locations to stay in roadless status and be managed to provide for the uses and activities I listed above. It is also extremely important to me that the T77 and the TNC conservation priority areas retain their roadless protections.

I do not support, and vehemently abhor, the Forest Services preferred alternative 6 for a full exemption. Nor do I endorse or otherwise support any of the alternatives 2 through 5 for partial exemption. A full exemption and any of the alternate 2 through 5 partial exemptions fail to recognize the needs and interests of Southeast Alaskans who live in and use the Tongass National Forest, because:

- 1) We've been through this before;
- 2) A large majority of residents, tribal organizations, people from other places, the courts and others previously supported the 2001 roadless rule provisions for the Tongass;

- 3) Too many other users would be economically impacted or eliminated; and
- 4) Earth needs the Tongass Forest for its future survival.

Forest management uses the term “Timber Harvest”. **Forests are not farms, plantations, or an agriculture commodity to be harvested.** The Tongass Forest is our home and gives us shelter, food, recreation, and quality life. Forests are interconnected systems of a variety of multi-aged trees, underbrush, ground cover, streams, lakes, mammals, insects, birds, estuaries, and swamps. The United States Forest Service belongs in a different department as are the US Fish and Wildlife Service, National Park Service, or the Environmental Protection Agency. Forests are the dominant terrestrial ecosystems on this planet, just as oceans are the significant aquatic ecosystems.

State of Alaska politicians, the Alaska Division of Forestry, and the private Alaska Forest Association, claim that a full exemption would provide for rural economic development opportunities. However, a **full exemption and any alternative 2 through 5 partial exemptions would not help create more long-term sustainable rural economic development opportunities, it would instead harm our existing rural economies that are based on the visitor industry, sport and commercial fishing industries, small-scale innovative timber operations, and the still growing marine science community.** Alternatives 2 through 6 would further harm rural economic opportunities because pursuing the same outdated economic model of old growth clearcut harvesting for export stifles innovation and possibilities in other sectors, such as mariculture, sustainable young growth harvest, and rural agriculture. If the Forest Service and the proponents behind the request to change the Tongass Roadless Rule conservation provisions want to support rural economic development, they should devote resources supporting our fishing and visitor industries, transition to second growth logging, invest in creating and maintaining recreation infrastructure, improve and streamline existing permitting processes for important community projects, rather than resurrecting old divisive conflicts.

It appears that the Forest Service preferred alternative has a single justification which is to satisfy a State of Alaska political initiative and request. I find nothing else in the proposal that supports the Forest Service preference. What technical and professional reasons did the Forest Service and Department of Agriculture use to develop the preferred alternative in the DEIS? I urge the Forest Service to give the highest priority to the voices of Southeast Alaskans over those of our political representation and corporate interests. Choosing a full exemption, or any of the partial exemption alternatives 2 through 5, will not create a long-lasting, durable solution for roadless areas on the Tongass. It will only increase legal challenges, uncertainty for our businesses, and conflict on the Tongass.

Thank you for providing me the opportunity comment freely.

Sincerely,

James Clare, P.E. (retired)

References:

1. Leighty, W.W.; Hamburg, S.P.; and Caouette, J.; Effects of Management on Carbon Sequestration in Forest Biomass in Southeast Alaska; *Ecosystems* (2006) 9: 1051-1065, DOI: 10.1007/s10021-005-0028-3
2. <https://cara.ecosystem-management.org/Public//ReadingRoom?Project=54511>
3. U.S. Department of Agriculture Forest Service, 2018 Northern Research Station Highlights, Another Benefit of Reforestation: Soil Carbon Sequestration
4. Ed. Zhiliang Zhu and McGuire, A.D., Baseline and Projected Future Carbon Storage and Greenhouse-Gas Fluxes in Ecosystems of Alaska, U.S. Department of the Interior, U.S. Geological Survey, Professional Paper 1826, , 2016
5. D'Amore, D.; Kane, E. 2016. Climate Change and Forest Soil Carbon. (August, 2016). U.S. Department of Agriculture, Forest Service, Climate Change Resource Center. www.fs.usda.gov/ccrc/topics/forest-soil-carbon
6. <https://www.drought.gov/drought/states/alaska>
7. <https://climate.nasa.gov/effects/>
8. <https://www.noaa.gov/education/resource-collections/climate-education-resources/climate-change-impacts>
9. <https://www.webmd.com/a-to-z-guides/news/20191106/climate-change-a-threat-to-human-well-being-scientists-say#1>
10. <https://www.npr.org/sections/goatsandsoda/2019/11/14/778992862/why-climate-change-poses-a-particular-threat-to-child-health>
11. <https://www.juneauempire.com/opinion/opinion-seeing-the-forest-for-more-than-the-trees/>
12. <https://www.juneauempire.com/opinion/opinion-keep-the-national-roadless-rule-on-the-tongass/>
13. <https://www.juneauempire.com/opinion/opinion-keep-the-national-roadless-rule-on-the-tongass/>
14. <https://www.juneauempire.com/opinion/opinion-clear-cutting-in-the-tongass-will-be-a-thing-of-the-past/>