



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

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**Statement of Standing:**

Lynn Canal Conservation is a 501(c)(3) nonprofit with approximately 300 members based in Haines, Alaska. Our members use and enjoy nearby Tongass National Forest lands for subsistence, recreation, physical and spiritual health, and economic well-being through fishing, tourism and other business ventures. The usefulness of the Tongass National Forest is especially based upon its diverse and essential ecosystem services. The living Tongass provides clean water, healthy fish and wildlife habitat, scenic beauty, clean air, climate stabilizing influences, and abundant subsistence resources. Tongass lands which have been degraded by clearcutting are greatly reduced in these values.

**Lynn Canal Conservation supports the No Action alternative**, which would keep the National Roadless Rule in place on Tongass lands. Following are a few of the many reasons to preserve the intact forests in the Tongass, and to preserve the protections offered by the Roadless Rule:

**Cumulative impacts on climate due to deforestation on National Forests.** The Tongass is the champion climate mitigation forest in the US as it stores 8% - 12% of all carbon in all US forests. The Climate Institute reports that, “It is estimated that 25% of the world’s total greenhouse gas production comes from deforestation alone. Furthermore, forests around the world store more than double the amount of carbon dioxide than is found in the atmosphere. This means that when areas are deforested, the carbon dioxide stored in those trees is released into the atmosphere.” Deforestation adds more carbon dioxide to the atmosphere than the sum total of cars and trucks on the world’s roads, which account for about 14% of global emissions. Cumulative impacts to global atmospheric carbon levels would be increased by any logging of old-growth forest on the Tongass. Logging of old-growth forests releases substantially more carbon to the atmosphere than selective logging of young, small-tree forests. The momentum of unbiased studies has now established this to clearly be the case, due to disruption of ancient soils (which actually contain more carbon than aboveground biomass), as well as the exponentially greater amount of non-lumber biomass which is disturbed by old-growth logging. If old growth logging is accompanied by increased roadbuilding, then the cumulative impacts to atmospheric carbon become even greater. Because the EIS fails to acknowledge and quantify this fact, the document fails to satisfy NEPA requirements for a “hard look.” The real contribution of deforestation to global climate warming since 1850 is as much as 40 percent, according to a 2018 report by Wolosin and Harris at Leeds University.

**USFS should reevaluate cumulative impacts of its deforestation activities in the context of global climate change.** This year, a series of court rulings have established that BLM must conduct a thorough analysis of the climate impacts of drilling before it allows development in order to comply with the National Environmental Policy Act (NEPA). Nearly a quarter of the nation's carbon dioxide emissions come from fossil fuels developed on federal lands, according to [a 2018 government study](#), and BLM manages the majority of that development.

The USGS publication, “Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005–14” attempts to quantify the balance of carbon emissions and sequestration on federal public lands in the U.S. The section entitled, “Terrestrial Ecosystems-Associated Carbon Emissions and Sequestration on Federal Lands” acknowledges, “Ecosystem carbon loss from forest timber harvest,” but doesn’t quantify the losses due to harvest, only those due to wildfires. Why? “Federal lands in the State of Alaska stored 131,675 MMT CO<sub>2</sub> Eq., with 92 percent stored in soils (120,618 MMT CO<sub>2</sub> Eq.) and 8 percent stored in live vegetation (11,057 MMT CO<sub>2</sub> Eq.). The amount of carbon stored on Federal lands in Alaska was approximately 62 percent of the total carbon stored on Federal lands, indicating Alaska’s importance in the overall U.S. carbon balance.” Table 6, page 17 of the report shows that Alaska’s federal lands consistently show a negative net emissions balance, despite sizable oil and gas production the state, showing that Alaska is a crucial area for national- even global- carbon sequestration. (<https://pubs.usgs.gov/sir/2018/5131/sir20185131.pdf>)

In this year’s ruling, the court found that BLM’s EAs and FONSIIs failed to take a "hard look" (as required under NEPA) at the cumulative impacts of GHG emissions that would be generated by oil and gas development on the leased parcels. Specifically, the EAs failed to (1) quantify and forecast drilling-related GHG emissions, (2) adequately consider GHG emissions from the downstream use of oil and gas produced on the leased parcels, and (3) compare those GHG

emissions to state, regional, and national GHG emissions forecasts, and other foreseeable BLM projects, rendering BLM's cumulative impact analyses inadequate.

(<https://www.whitecase.com/publications/alert/judge-orders-government-account-climate-change-impacts-leasing-federal-lands>)

LCC requests that the USFS take the “hard look” required by NEPA and thoroughly evaluate the cumulative impacts of GHG emissions that would be generated by planned deforestation activities on USFS lands, including the Tongass. USFS should 1) quantify and forecast deforestation-related emissions, 2) adequately consider GHG emissions from downstream use of forest products removed from National Forests, and 3) compare those GHG emissions to state, regional and national GHG forecasts, and other foreseeable USFS and other federal agency projects. Additionally, because National Forest lands have the potential to be significant carbon banks and to contribute to mitigating climate disruption, USFS should compare planned deforestation activities to “No Action” alternatives nationally, as well as to proactive alternatives which increase reforestation activities above current levels.

USFS needs to address its role in the current climate crisis and reevaluate its outdated operations model in light of the scientific consensus on climate change and biodiversity loss, which are now widely recognized as existential threats to life as we know it on earth.

**Biodiversity loss due to deforestation, especially old growth deforestation.** Seventy percent of the world's plants and animals live in forests and are losing their habitats to deforestation. The loss of habitat means the loss of species and therefore the loss of biodiversity. A vast body of science supports the understanding that lands maintained in roadless condition are demonstrably better at providing ecosystem services, maintaining biodiversity, and retaining sequestered

carbon. All three of these benefits are directly in the public interest. It is the duty of the USDA to support the continuation of these benefits to the public to the best of your ability. The EIS fails to account, either in metric or narrative form, for the different impacts to biodiversity and carbon sequestration from the different proposed alternatives. A given amount of logging harvest (e.g., 46MBF/year) can actually have widely different impacts to these values depending on whether or not it is accompanied by the increased soil disruption and forest fragmentation caused by additional roadbuilding. Failure to acknowledge and describe these differences renders the EIS scientifically unsound and invalid.

**The role of intact forests in moderating climate patterns, including rainfall and temperatures.** Forests moderate local climate by keeping their local environments cool. They do this partly by shading the land, but also by releasing moisture from their leaves through transpiration. David Ellison of the Swedish University of Agricultural Sciences in Uppsala, reported on “increasingly sophisticated literature” assessing “the potential impact of forest cover on water availability across the broad expanse of continental, terrestrial surface.” [Doug Sheil](#) of the Norwegian University of Life Sciences, near Oslo. “But the forests cause the rainfall, and if they weren’t there the interior of these continental areas would be deserts.” When trees are cut down in a forest, it eliminates or decreases the amount of transpiration, which means that the amount of rainfall in that area will decrease. This can lead to droughts in the area.

**The role of deforestation in changing climatic patterns, including rainfall amounts and patterns, localized warming, wildfire susceptibility, and regional drought.** Deforestation is likely to warm the climate even more than originally thought, scientists warn. A report released in 2018 from University of Leeds found reactive gases emitted by trees and vegetation have an

overall cooling effect on our climate, meaning deforestation would lead to higher temperatures than previously anticipated as less of the gases would be created. Forests release a range of volatile organic compounds that “have an overall cooling effect on our climate,” mostly by blocking incoming solar energy, says Dominick Spracklen of Leeds University in England. Removing forests eliminates this cooling effect and adds to warming, he and an international team concluded in a [study](#) published earlier this year. Older forests are less prone to widespread damage due to wildfire. Younger forests and deforested areas are more prone to extreme wildfire. Alaska is seeing ever-worsening wildfire seasons, highlighting the need to protect remaining intact forests and their associated ecosystem services.

**Roads and deforestation impact fisheries.** Every proposed action alternative in the DEIS (except alternative 1, the No-Action alternative) would increase access to old-growth forest and lead to more clearcut logging and costly road building in undeveloped, wild areas of the Tongass. These activities would add to the already 5,100 miles of logging roads which are the primary source of increased sedimentation which lowers water quality. Roads often block salmon migration, and new roads would add to the current \$68 million maintenance backlog on the Tongass. More roads threaten wild salmon and the Alaskans who rely on them for subsistence, sport, and commercial fishing. The Tongass is one of the world’s largest remaining intact temperate rainforests. The Tongass provides spawning grounds for roughly a quarter of the West Coast’s salmon fishery, and provides habitat for apex predators such as bears and wolves, as well as for birds such as the Marbled Murrelet and the Queen Charlotte Goshawk. These species and others rely on healthy, connected old-growth forests for habitat. Southeast communities rely on the ecosystem services and sustainable resources provided by the living Tongass.

**The proposed action disproportionately impacts subsistence-dependent communities, including Alaska Native communities.** Alaska Native communities should be respected by honoring their right to Government to Government consultation with all governmental agencies, including USFS. Visiting Forest Service representatives reported in Haines this fall that 90% of the 144,000 public comments supported the No Action alternative, which would keep the Roadless Rule intact on the Tongass.

For all of the above reasons, and other reasons detailed by other commenters, Lynn Canal Conservation requests that the USFS respect public opinion, act in service to the public good, and select the No Action alternative, keeping National Roadless Rule protections on the Tongass National Forest.

Thank you for the opportunity to comment.

Sincerely,

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