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Comments: AK Comment Letter

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RE: TONGASS NF ROADLESS RULE

Jim Steitz

Gatlinburg TN 37738

October 19, 2019

Chief Vicki Christiansen

U.S. Forest Service

1400 Independence Avenue SW

Washington, DC 20250-1111

Dear Chief Christiansen,

I implore you to reject the request from the Alaska state government to nullify the vital protections for roadless areas in the Tongass National Forest. Eighteen years ago, the Forest Service came to the long-overdue but morally obvious conclusion that all remaining roadless forests are precious beyond economic measure, and that their highest and best use is to remain biologically intact. Since then, intact virgin forests have only become scarcer, both nationally and in the Tongass, and the moral case for their protection has only become stronger. For the Forest Service to even momentarily entertain this astoundingly selfish request from the Alaska state government is a gross abdication of your responsibility to the public interest.

These roadless forests are national treasures, whose biological value vastly outweighs the value of any timber that will be extracted from it. This exchange of an immensely verdant, kaleidoscopic biological treasure for a low-value commodity of lumber pulp is the most lopsided, unholy transfiguration of treasure to commodity that a myopic human conscience has ever undertaken. It is heartbreaking to see the Forest Service, after making its belated transition toward an ecologically sustainable management model, regress to the status of on-call service providers to the highly subsidized local timber racket. The Tongass is once again being subordinated, by transparently corrupt political authorities in Washington, to the parochial demands of local politicians who direct this mercantilist arrangement. The Forest Service's statutorily and morally demanded service to the public interest is being cynically discarded.

For decades, the Tongass staff managed its writ as a private lumber and pulp fiefdom for a handful of timber

mills, supporting economically marginal operations. An unfathomably verdant and sublime national treasure was liquidated for the petty, subsidized self-engorgement of a handful of mill owners and a small employment cohort, even by rural standards. The Tongass was treated as a world apart from the expectations of morally sane management that Americans demanded of the Forest Service in the continental US. Mercifully, the 2000 Roadless Area Protection Rule brought a cease-fire upon America's only temperate rainforest, in recognition of the immense biological value that had been concealed and ignored by local interests. The Federal Register notice for this NOI states,

"The Department and Forest Service believe that current timber harvest and road construction/reconstruction restrictions can be adjusted for the Tongass National Forest in a manner that meaningfully addresses local economic and development concerns while balancing roadless area conservation needs."

This is patent nonsense that requires willful blindness, both to the plight of the Tongass forest ecosystem, and to the minuscule economic benefit from reinstating the roadless, old-growth logging program of the Forest Service's sordid past. The salmon fisheries alone, sustained by the spawning and natal grounds of the Tongass's clear, oxygen-saturated streams, exceed the pathetic commodity value of any lumber or pulp that could be

ripped from it. There exists no remotely conceivable cost-benefit analysis, by which further bulldozing and

logging of the Tongass's roadless forests could yield a net benefit even to Alaska, much less to

the cumulative American interest, on whose behalf the Forest Service ostensibly is employed.

If the request of Alaska is granted, to rescind the protections for roadless areas enacted almost 20 years ago, the timber barons on the Tongass staff would resume a maniacal, wonton schedule of forest liquidation, nullifying the progress that the Forest Service has made in improving the management of the Tongass. For decades, the federal government sold this treasure for the pettiest, most criminally wasteful use as mere pulp and lumber to local mills with uniquely subsidized arrangements with the Forest Service. While most of southeast Alaska's citizens, and most avowedly the subsistence communities who depend on fishing and hunting, have relegated such liquidation logging to the past, a small commercial clique with sway over Alaska's Congressional delegation and governor's office clings to a dream of resurrecting their logging entitlements. You must reject this blatant attempt at theft of our common treasure.

By offering to resurrect roadless area timber sales, the Forest Service is retarding the economic diversification of the Alaska panhandle toward a more sustainable resource base. The history of the Tongass is fraught with battles against powerful timber companies that converted these forests, at taxpayer expense, into their own private riches. The communities of Southeast Alaska have made admirable progress in moving away from the horrific old days of ancient forest liquidation of the 70's and 80's, toward a more stable, sustainable relationship to the Tongass. The 2010 transition plan promised a more enlightened, sustainable, ecologically

compatible management system for the Tongass to complement and encourage this socioeconomic progress, and rescission of the Roadless Rule would abolish that promise.

Continued roadless, old-growth logging also explicitly ignores the overriding national interest in protecting this critical component of Earth's life-support system. The Tongass is home to a large portion of the ancient forest remaining in American jurisdiction, and its destruction would constitute a heinous abdication of America's responsibility to maintain Earth's life-sustaining capacities of oxygen production, carbon sequestration, and nutrient cycling. The Forest Service appears blissfully unaware of this urgent need to maintain the Tongass's immense stores of carbon that will terribly exacerbate global warming if they are turned to pulp, oxidized and

desiccated under the open sky. Our planet is already losing a terrifying amount of its forest cover. The US government must maintain the extremely high-biomass stands of the Tongass on every last acre that it yet controls, and not transfer them to timber interests who disavow any concern for Earth's habitability.

Again, please withdraw this asinine proposal to resume the invasion of the Tongass roadless forests, and instead fulfill the overdue 2010 transition plan immediately. Like an addict to a pathological substance, the timber industry and its political assets must be broken from their murderous lucre of choice, not granted a prolonged period of denial, resistance, and rationalization while our national treasure is demolished. The Forest Service must not spend another decade feeding the local timber barons upon the last roadless old-growth in the Tongass, during which they will agitate for further delay and ultimate return of the Tongass to the legal status of a pulp plantation. Only a complete affirmation of Forest Service commitment to protect all remaining roadless areas and old-growth can align Tongass management with the interests of all Americans who own these public lands, and all humans who breathe oxygen from the Tongass. Thank you for your attention to this urgent issue.

Sincerely,

[Signature]

Jim Steiz

[Position]