Data Submitted (UTC 11): 12/10/2019 9:00:00 AM
First name: Michael
Last name: Taylor
Organization:
Title:
Comments: My comments are included in the attached letter. I strongly favor Alternative 1, The No Action Alternative.

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

Comments on Alaska Roadless Rulemaking

Michael S. Taylor, MS

Gustavus, Alaska
December 10, 2019

The Nub:

The USFS 2001 Roadless Rule should remain intact for Alaska and the Tongass National Forest Roadless Areas should retain the full protection of the existing rule. There should be no exemption from the Roadless Rule for Alaska and there should be no Alaska-Specific Roadless Rule. The overarching values of the Tongass are as a carbon sink, storehouse of biodiversity, and provider of other vital ecosystem services. The value of intact old growth forest as a carbon sink and as a continually effective sequester of carbon to offset the releases from burning fossil fuels must be paramount.

My Reasons:

I am a long-time resident, City Council Member, and former Mayor of Gustavus, Alaska. I attended with many other residents the 2018 scoping meeting and the 2019 informational meeting in Gustavus. I studied materials provided by the USFS at the meetings, and reviewed the original Final Rule as posted in the January 12, 2001 Federal Register for further background. And I have studied the six alternatives for changes to the application of the Roadless Rule to Alaska and the Tongass National Forest. The Tongass boarders Gustavus at Pleasant Island and on Excursion Ridge, and lies within a short boat ride along both shores of Icy Strait. The northern Tongass is essential natural capital for Gustavus supporting our economy, particularly through tourism, and our lifestyles through recreation and subsistence activities. Some of the building materials in my own home came from the Tongass. Our community has a strong stake in the long-term health and natural function of the Tongass National Forest, but so does the rest of the world.

The Final 2001 Roadless Rule begins with a section titled [ldquo]Purpose and Need for the Roadless Area Conservation Rule.[rdquo] It sets forth clearly and definitively the values of retaining national forest roadless areas in their natural state, disallowing with few exceptions new roads and timber harvesting. The reasons in

2001 for selecting the (then) Alternative 3 and for rejecting an exemption alternative for the Tongass, are well-stated in the Federal Register. I don[rsquo]t need to restate them here. Please consider me in continuing support for those values and arguments.

However, the Final Rule failed to mention one additional key reason for retaining the roadless areas of the Tongass intact. The old-growth forest remaining in the Tongass is a major carbon sink and continues to sequester a huge amount of atmospheric carbon year after year. Our nation, indeed the entire energy-hungry world, struggles to reduce our carbon emissions. The transitions are difficult and usually costly. Engineered carbon capture and storage is particularly expensive and technologies are uncertain. But as Bronson Griscom, et al, showed in their 2017 paper in the Proceedings of the National Academy of Sciences: [ldquo]Natural Climate Solutions can provide 37% of cost-effective CO2 emission mitigation needed through 2030 for a >66% chance of holding warming to below 2C. Reforestation, avoided forest conversion, and natural forest management are at the top of the list of 20 cost-effective strategies reviewed by Griscom, et al. In June 2019, Moomaw, Masino and Faison published a paper titled [ldquo]Intact forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good[rdquo] in the journal Frontiers for Global Climate Change. This widely acclaimed paper demonstrates the extraordinary importance of protecting intact old growth forests [ldquo]as the most effective solution to dual global crises[mdash]climate change and biodiversity loss.[rdquo] The Roadless Areas of the Tongass are America[rsquo]s best opportunity to apply intact old-growth forests to these vital ends. Please review the Moomaw, et al paper and assure that it informs the final decision on application of the Roadless Rule to Alaska.

The Tongass is a massive carbon sink, and it[rsquo]s working for us to solve two major world problems for free. Gordon Orians and Dominick A. DellaSala reported in [ldquo]Alaska[rsquo]s old-growth forests are our climate-change insurance policy,[rdquo] (Seattle Times, March 15, 2018) that the Tongass alone absorbs approximately 8 percent of the nation[rsquo]s annual global warming pollution. No other national forest even comes close, making the Tongass the nation[rsquo]s premier climate insurance policy[rdquo]. The Griscom, et al paper further notes that nature-based strategies offer valuable ecosystem services [ldquo]improving soil productivity, cleaning our air and water and maintaining biodiversity.[rdquo] In SE Alaska, intact natural forests with their fabulous scenery and rich fish and wildlife are a major draw of visitors from around the globe, with economic benefits that dwarf logging. Those forests also support valuable sustainable commercial fisheries in SE Alaska.

So as we consider where the greatest value of the Tongass rests, it[rsquo]s not in providing trees to be stripped (once!) by a tiny handful of government-subsidized loggers and likely shipped overseas. Far more important regionally and globally, the Tongass is an absorber of massive amounts of atmospheric carbon, a treasure trove of wild biodiversity, and a source of many other valuable ecosystem services.

But realization of these true values of the Tongass requires that existing roadless areas stay free of roads and timber production. Roads and clearcuts not only remove stored carbon, they fragment the forest. Winston Smith (with long professional experience in the Tongass) in his scoping comment to you on 10-1-18 cautions against further fragmentation of wildlife habitat in roadless areas of the Tongass. He warns of underestimated extinction risk to key species populations in the Tongass Land Management Plan, Wildlife Conservation Strategy. His thesis is yet another reason for keeping the roadless areas intact.

It[rsquo]s long past time we begin to live within our wood products production means. I am originally from Oregon and proudly worked in the timber industry in the Pacific Northwest while in college in the 1960s. For decades the timber industry claimed it was cutting trees sustainably, but we are now down to the last bits of old growth forest nationwide and second-growth is deemed unattractive by timber interests. Some would cut old-growth forest until it[rsquo]s all gone. Then what? In SE Alaska accessible timber remains on private forest lands, State lands, and on already roaded areas of the Tongass. We should steward those resources sustainably, reforest and restore previously-developed forest areas wisely, and resolve to cut second growth trees only on sustainable long-term rotations. Such a strategy would apply the top three Natural Carbon Solutions promoted by Griscom et al. Leaving the Roadless Areas as intact forest forever applies the advice and wisdom of Moomaw, et al. It[rsquo]s not necessary to harvest the remaining wild forest areas of the Roadless Areas of the Tongass, which serves better as a major sequester of carbon.

Conclusion:

When President Teddy Roosevelt and Gifford Pinchot fought to establish our first national forests in the first decade of the 20th Century they intended to protect and sustain forest resources for the common people. They fought hard to keep wealthy special interests from cornering forest resources at the expense of the public[rsquo]s long term interest. They were largely successful and we have a wonderful national forest system today as a result. It is a core value of our democracy that governments govern through the consent of the governed. In 2001, Americans, through the USFS public process, consented to applying the Roadless Rule to the Tongass National Forest. In 2019 the USFS has come back to the public proposing to exempt the two forests in Alaska from the Roadless Rule. During the scoping period, the vast majority (>90 %!) of comments both from outside Alaska and within Alaska, favored retaining the Roadless Rule intact for Alaska, and particularly for the Tongass NF. The public is clearly saying [ldquo]No.[rdquo] You do not have the consent of the governed to remove the forests in Alaska from the Roadless Rule.

Those of us who care about the future of the Tongass, are sadly disappointed by the Dunleavey administration[rsquo]s insistence, against the great weight of public opinion, that the USFS exempt the Tongass from the Roadless Rule. The State position is short-sighted and panders to a tiny, obsolete, and dying industry at the expense of all the rest of us, and the needs of our Planet. Rather than urging the USFS to subsidize a handful of SE loggers and millers at great loss to the Treasury and to our forest health, the State should press the Service to employ residents in small communities to invest in forest health, restore forest in logged areas, remove fish passage barriers, and restore damaged streams and view sheds. The USFS should respond to the broader needs of Alaskans, Americans, and the World and reject the notion of expanding roads and timber production into the unroaded areas of the Tongass. The only reasonable alternative is 1, the No Action Alternative.

Sincerely,

Michael S. Taylor, MS
Gustavus, Alaska 99826

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