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First name: Karla

Last name: Hart

Organization:

Title:

Comments: See attached file(s)

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December 16, 2019

Alaska Roadless Rule

USDA Forest Service

P.O. Box 21628

Juneau, Alaska 99802-1628

Docket ID: FS-2019-0023

I urge the no-action alternative for the proposal to undo the 2001 Roadless Rule for the Tongass National Forest. None of the other alternatives is acceptable. Period. If you want to open up to ALL alternatives then we need to go back in and look at what additional areas may be ripe for Roadless Status. This agreement set in 2001 was after a lot of public process. Attempting to change that now is wrong. By the huge volume of responses to date, it is clear that Americans, including Alaskans, want the Roadless Rule to remain intact.

I am a lifelong resident of Alaska, with over 55 years living in Southeast Alaska.

Rolling back the Roadless Rule designation has impacts so broad and destructive that I, as a private citizen, do not have enough time to personally analyze and respond to every detail. By reference I support and include all 117 pages of comments submitted December 16, 2020 by the professionals at the Alaska Wilderness League, National Wildlife Foundation, Audubon, Alaska, Southeast Alaska Conservation Council et. al on as mine.

Climate Change

The science is solid. Climate change is happening. The Tongass has immense global value for carbon sequestration. This paragraph is short because you should already know this and it should be at the top of your consideration. Leave the old-growth alone, leave the roadless areas intact and undisturbed.

Leighty, Wayne W, Steven P Hamburg, and John Caouette. "Effects of Management On Carbon Sequestration In Forest Biomass In Southeast Alaska." *Ecosystems*, v. 9, 7 pp. 1051-1065. doi: 10.1007/s10021-005-0028-3

Ecological Values

Leave the roadless areas intact and let natural processes unfold. We don't even know what we don't understand, or misunderstand. No volume of analysis in an environmental document today can predict what people will know and value tomorrow. Looking back just a few decades shows the ongoing learning curve 1. DO NO HARM, leave the roadless areas roadless. These roadless areas extend from presently glacier-covered rock through alpine, sub-alpine, various forest

1 An example of the ongoing learning is found in this 2003 Forest Service publication on Pacific Northwest forests. <https://www.fs.fed.us/pnw/pubs/science-update-4.pdf>

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zones and stages of growth, down to tidewater and the unique uplifting margins of the Archipelago. Complex. Understudied. Exploitation of these areas is not in the best interests of the Tongass or of the present and future generations of people, wildlife, animals, and plants that will live here.

Reports are that North America has lost a quarter of its birds (3 billion in numbers) in the past 50 years. We don't know what we're doing. We don't know how it will play out. Keeping intact and undisturbed habitat is one small way we can slow the harm.

Roads bring vehicles which bring an assortment of hydrocarbons. As all of us who live here innately know, you can always follow the water to the ocean. Every bit of the Tongass is part of a watershed, flowing clean water downhill. An oil leak, a blown radiator, diesel spilled from a transfer, all flows downhill and into water systems. Keeping our waters pure keeps options open for future generations.

Invasive Species

Volunteering for the Tongass National Forest was my introduction to invasive species weed control, and the pervasiveness of invasive species in areas of human disturbance. For twenty days total I joined teams of volunteers in assisting the Admiralty National Monument in controlling invasive species along the beach/forest fringe in two different areas. On hands and knees we pulled, and pulled, and pulled. Areas where bears had dug created disturbance that allowed the invasives to thrive. Miles from the source location of the invasives, I walked a bear trail and thought to look where it popped onto the beach. Invasive. Likely the seed was transported by a bear.

I have also volunteered on Chichagof Island with a bird researcher. One of the study sites is accessed way up an old and barely passable logging road. We bushwhack through dense second growth and then pop out into a lovely and large muskeg and walk some distance. There, growing next to a little muskeg stream is a dense clump of reed canary grass, seeds coming along nicely.

I've watched brown bears grazing on beach rye. And I've stopped onto beaches where the beach rye is thinned out dramatically (male pattern baldness came to mind) by a plant I didn't know and haven't identified. What will the bears eat in the spring if the beach rye is displaced by invasives?

Staff on the Tongass do not have the resources to adequately monitor or address invasive species under existing conditions. Right now, in the roadless areas, there is a high likelihood that invasives are not a big concern in places not previously disturbed or occupied. Open areas to new roads and development and that will change.

Control of invasives on the Tongass now combines manual (pulling, tarping) and herbicides. We don't really know what we're doing with herbicides and what their impacts. Right now the implications of PFOAs and PFAs are just sinking in, from firefighting foams that are still being used by governments today, even as we know their hazards and their persistence. Prevention is far cheaper than cleanup and control. Let's not open areas to roads that will lead to invasives that will lead to expenses and use of chemicals (or acceptance of degraded ecosystems).

I was unable to find or get details on invasive control on the Tongass. I don't know how much is spent. I don't know how much would be required to effectively control invasives. I don't know who is doing what. A detailed analysis of what it would take to keep invasive species out of roadless areas that are newly roaded (and likely stubbed from areas with well established invasives) should be required before considering any economic impacts related to costs and benefits of giving up any of the presently designated Roadless areas.

Timber Harvest

Bias in the document becomes clear with this statement (page 3-23), "The communities of Southeast Alaska depend on the Tongass National Forest in various ways, including employment in the wood products, commercial fishing and fish processing, recreation, tourism, and mining and mineral development sectors." Why is wood products listed first? Timber is the smallest economic sector listed in your table 3-2.1, at one percent of the total employment and earnings (compared with 17% of employment and 11% of earnings for the visitor industry). The Roadless Rule threatens the natural wonder of the Tongass that attracts visitors. It threatens the fisheries the employ and feed so many. It threatens remote recreation. I expect that the new marijuana industry is creating far more jobs in the region than exist in the timber industry.

Mining

The analysis claims "Locatable minerals development is possible within designated roadless areas under all alternatives. The General Mining Act of 1872 authorizes and governs prospecting and mining for economic minerals on federal public lands, including designated roadless areas. Changes in roadless management are, therefore, not expected to affect existing or future locatable mineral exploration or mining activities on the Forest." We have demonstrated that Green's Creek and Kensington Mines both have roads within roadless areas. That made me wonder why I saw a couple of the strongest local proponents of mining at the public meeting the Forest Service held on Roadless in Juneau.

What changes would a mine realize if developing and operating in a Roadless area vs one where that designation is removed? This information should have been clearly outlined in the DEIS. Stating that something "is possible" and "not expected to affect existing ... mining activities" does not give the full picture. What criteria must be met in a Roadless area and what criteria in other designations proposed?

As glaciers recede and more areas are newly exposed to exploration and potential development, this is important to know before a decision is made.

Further "Under the 2001 Roadless Rule roadbuilding is prohibited for any new leasable mineral projects, including geothermal projects, within IRAs. Changes in management under Alternatives 2 to 6 would allow road development to differing degrees. Within Roadless and Timber Priority ARAs, roads would be permissible for leasable projects. The Tongass has no recent or current leasable mineral activity and the anticipated demand for leasable minerals is expected to remain low. As a result, changes in designated roadless management are expected to have limited impacts on mineral development."

The lack of ability of the authors of this report to see into the future or envision things is not

reassuring. Given that within the context of this proposal, leasable mineral projects are not foreseen and expected to remain low in demand, there should be no changes in management under any of the alternatives that would allow road development for leasable mineral projects. Period. If a future project arises which is so compelling as to warrant consideration, it should stand alone on its own merits and weight benefits vs losses in its own process, not through the lack of vision of the authors of this report.

Subsistence and Personal Use for Food

You gave consideration to subsistence as required by law under ANILCA. You entirely disregarded the food harvesting that goes on in and around Juneau. This oversight indicates a lack of understanding of the social, economic and cultural practices of my community. We pick berries, harvest mushrooms, seek out wild greens, hunt deer, goat, grouse, ptarmigan, and waterfowl. We catch fish and harvest shellfish, all that require clean waters (and healthy streams for salmon and trout).

It Is Not All About People

In Table G-3 you address whether acreage in a roadless area is a priority use area for a community. This is not just about people and those of us who live close to and use an area. While I treasure my connection to place and lands in the Tongass, I also treasure the lands upon which people rarely ever set foot.

DEIS Timeframe

Appendix B, page B-2

The study authors state: "The timeframe for this cumulative effects analysis encompasses past and future activities. Past activities include timber harvest and other activities that date back over 70 years, while future activities consider timber harvest up to 100 years in the future. Most other future activities can only be considered as reasonably foreseeable about 25 years or less into the future because of uncertainties beyond that point."

How do they possibly imagine that they can foresee what timber harvest up to 100 years in the future in the Tongass will be? Did they foresee the collapse of the market for Tongass timber?

I don't see inclusion in the documents section this April 2016 report: "Tongass National Forest Timber Demand: Projections for 2015 to 2030" by Jean M. Daniels, Michael D. Paruszkiewicz, and Susan J. Alexander. USDA General Technical Report, Pacific Northwest Research Station PNW-GTR-934 2016 (https://www.fs.fed.us/pnw/pubs/pnw_gtr934.pdf) There are so many variables in timber harvest that predicting even 10 years out with any degree of confidence is unlikely. Trade agreements (think China and the trade war), change in political leadership (at least every 8 years), budget cycles, natural disasters creating demand for lumber (or not), other countries dumping a lot of lower-priced products onto the global market, the price of oil driving the demand for wood chips and other bio fuels, ...

A review of Beier, C., A. L. Lovecraft, and T. Chapin. 2009. Growth and collapse of a resource system: an adaptive cycle of change in public lands governance and forest management in Alaska. *Ecology and Society* 14(2): 5. [online] URL: <http://www.ecologyandsociety.org/vol14/iss2/art5/> further reinforces doubt that the Forest Service or Alaska forest products industry is

capable of accurately projecting timber harvest 100 years into the future. I quote from Beier:

"In summary, the collapse [?] phase was initiated by dramatic and Tongass-focused policy changes (TTRA) that effectively dismantled the Tongass policy monopoly and thus irreversibly transformed the policy subsystem. Closure of the pulp mills in Sitka and Ketchikan, triggered largely by fiscal concerns arising from both loss of lease subsidies and market volatility, forced action in the institutional subsystem to terminate the long-term lease contracts. As the glue that held the entire governance system together[mdash]i.e., coupling the institutional, economic, and policy subsystems of the Tongass into a rigid configuration[mdash]the dissolution of lease contracts had catastrophic consequences. Rigidity in the system, created initially to promote growth but increased over time as a mechanism to resist external changes, precluded any efforts to adapt or transform. Since collapse, Tongass governance has been largely incapable of reorganization."

Summary

In summary, leave well enough alone and select the No Action Alternative.

Regards,

Karla Hart

[Position]