

Data Submitted (UTC 11): 9/29/2020 8:00:00 AM

First name: Clinton

Last name: Nagel

Organization:

Title:

Comments: Please accept my comments below on the proposed Tongass National Forest; South Revilla Integrated Resource Project.

I appreciate the opportunity to comment, but I urge the Forest Service to adhere to a different paradigm of protection of resources rather than timber management and an old outdated strategy of extraction. Our world cannot handle more ecological harm.

September 28, 2020

Shane Walker, District Ranger

ATTN: South Revilla Integrated Resource Project

USDA Forest Service

Tongass National Forest, Ketchikan Misty Fjords Ranger District

3031 Tongass Avenue

Ketchikan, AK 99901

Dear Mr. Walker:

It has come to my attention that the Trump Administration and the US Forest Service has proposed to log part of the old-growth section of the Tongass National Forest. In the process of doing so, you (and they) will undermine and overturn the Roadless Rule which prohibits logging in unroaded areas. This same-old battle has become tiresome over the years, yet for the sake of the planet there needs to be a huge uprising of support to put these threats to the planet to rest, once and for all. I have been and always will be adamantly opposed to such action, reasons which will be specified out later in these comments.

First, to the project as we know it and I understand it. The U.S. Forest Service has released the draft environmental impact statement for the South Revilla Integrated Resource Project on the Ketchikan Misty Fjords Ranger District. This timber sale proposes to chain-saw 5,115 acres of old-growth forest near Ketchikan. In addition to the two massive clearcuts, the proposal recommends the necessary action of building 14.4 miles of

new roads, 34 miles of new temporary roads and the rejuvenation of 34.1 miles of currently closed roads. This results in over 80 miles of additional roadways onto the landscape costing the U.S. taxpayer \$11 million.

I am adamantly opposed to logging old-growth forest. These forests serve to provide protection for our watershed, our water quality; they provide for the biodiversity and biological integrity, and they help in carbon sequestration. They provide habitat and protection for countless species of wildlife and plants. Our society gains much more from an intact old-growth forest than it ever will from the cutting these types of forests down for a one-time economic beneficial gain. We are having these discussions in Montana as well; the only difference is that scientists agree the Tongass National Forest is critical in the importance and stature of controlling our climatic future. In regards to the Tongass, we are referring to a biome that has world-wide impact on the global scale of climate change. Have we not learned anything from the year 2020 yet?

The Climate Science:

I can provide document after document, science after science that advocates for the rationale of allowing our forests to be utilized as carbon sinks. Randi Spivak, public lands director at the Center for Biological Diversity, makes this argument.

"Clearcutting the Tongass and wiping out enormous carbon stores is like cutting off part of the planet's oxygen supply. It's mind-boggling that the Trump administration wants to decimate this spectacular old-growth forest and erase one of the solutions to averting catastrophic climate change."

This proposed action advocated by this Administration is anti-science and anti-logical. What the heck are we doing? What we're actually saying, even by proposing such action, is that money is more important than the health of our planet or even that of mankind. There is no rationale that makes this action [right] or logical. Osprey Oreille Lake, executive director for the Women's Earth and Climate Action Network (WECAN), said this:

"As forests across the Americas burn, the last thing we need to do is destroy old-growth forests in the Tongass Rainforest, one of the United States' best defenses against furthering the climate crisis,"

Timber thinning, clearcutting and other actions actually opens up the forest to more direct sunlight, wind exposure and lowering humidity; actions that actually increase the threat of more fires to the forest not less. These actions as proposed are counterproductive to the health of the forest and therefore cannot be sanctioned as good forest management policy.

I would like to refer the Forest Service to an article in Earth Island Journal. In an article entitled "Logging Is

the Lead Driver of Carbon Emissions from U.S. Forests. If we want to effectively mitigate climate change, it's time for bold action to protect forestlands, a 2019 article by (Smith, Danna; Hanson, Chad; and Koehler, Matthew, 2019), supplies these outtakes.

But the promotion of logging to supposedly curb carbon emissions is just part of the Administration's ongoing alignment with industry and troubling pattern of climate science denial. Carbon emissions from logging in the US are ten times higher than the combined emissions from wildland fire and tree mortality from native bark beetles. Fire only consumes a minor percentage of forest carbon, while improving availability of key nutrients and stimulating rapid forest regeneration. Within a decade after fire, more carbon has been pulled out of the atmosphere than was emitted. When trees die from drought and native bark beetles, no carbon is consumed or emitted initially, and carbon emissions from decay are extremely small, and slow, while decaying wood helps keeps soils productive, which enhances carbon sequestration capacity over time.

Consider this: About 28 percent of tree carbon is contained in branches, and this is emitted when they are burned after logging operations. An additional 53 percent of the carbon in trees removed from forests is emitted as waste in the manufacturing and milling process. Overall, about two-thirds of the carbon in trees that are logged for lumber quickly become greenhouse gas emissions.

This is damning proof that logging is not beneficial to our world. So why is this administration still promoting it?

The Economic Sense:

Logging is a lose, lose economic proposition. According to the Center for Sustainable Economy, in their May 21, 2019 article by John Talberth, he states the following:

documented taxpayer losses of nearly \$2 billion a year associated with the federal logging program carried out on national forest and Bureau of Land Management lands.

He is saying that the federal program to permit continued logging is costing the American taxpayer money. This is especially harmful when you consider that timber only contributes to 1% of Southeast Alaska's economy. This organization also agrees that:

Our federal forests are far more valuable as carbon sinks, recreation destinations, wildlife habitat and natural water filters than they are for timber production.

What these types of projects actually do is place the American taxpayer in greater debt. For what purpose, other than to carry on an outdated economic theory that no longer exists? I will present one more article here to get my point across, one that directly applies to the situation at hand. In an article published by Alaska News Source, (the online version .com) makes this statement in the Oct. 2, 2019 article by Grant Robinson.

[ldquo]In an analysis of 20 years of Forest Service data, Taxpayers for Common Sense say that timber sales in the Tongass have resulted in a net loss of nearly \$600 million over the last two decades when adjusted for inflation.[rdquo]

They go on to state:

"It's a lot of administration and execution and planning and processing that has to happen at the Forest Service, and we're not just getting the price per board foot to compensate and bring in the revenue for those receipts generated from the sales to cover those costs," said Autumn Hanna, vice president of Taxpayers for Common Sense, an independent, non-partisan budget watchdog organization.[rdquo]

Destroying critical old-growth forests in the Tongass or anywhere else is not a viable economic action. It is not a viable climate problem-solving action either.

In Conclusion:

There is so much more to be said on the harmful impacts this kind of logging produces on the landscape, but my time and resources are somewhat limited. But I should note for brevity purposes, it harms the watershed, the water quality, wildlife habitat, biological integrity and biological diversity. It harms the soil integrity and the soil biome and reduces the current micro-climates at the surface that would intensify future wildfires. These are all resources the Forest Service is also mandated to protect. What kind of sense does it make to destroy or harm a series of natural resources owned by the American taxpayer for the economic benefit of the few? Does the economic gain of the few override the devastating loss of the many?

It[rsquo]s time for a change. I[rsquo]ve said it over and over and time and time again, there needs to be a new paradigm or premise practiced by the Forest Service as it develops management policies related to climate change. But it doesn[rsquo]t do any good if the Forest Service is determined to do what they want to do. It doesn[rsquo]t help the planet or the life this planet is trying to sustain. That natural action of sustainability seems to be one that we (as man) are trying to make it fail. The Forest Service needs to reject and abolish this project. For these reasons, I support the no-action alternative (Alternative 1).

Sincerely,

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