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Comments: 1.I support the "No Action" alternative for the Central Tongass Project #53098. I struggled with the writing of comments on the CTP DEIS as I believe my critiquing its "vagueness" versus site specifics is pointless. 2.Instead, I offer Dominick A. DellaSala's 11 September 2019 Anchorage Daily News / Opinion, "The Tongass deserves a better path forward":

"In response to former Gov. Frank Murkowski's Sept 6 op-ed calling for a full exemption of the Tongass National Forest from roadless protections, its remarkable how much has changed since he was governor. Instead of regressing to the heyday of rampant old-growth logging, no longer acceptable in Alaska or the nation, there is a path forward that reduces controversy, sustains jobs, saves roadless areas and slows down climate chaos by transitioning to young-growth forests. And as far as access issues he is concerned about, the Forest Service already has exercised its discretion to approve 67 projects in roadless areas that involved tree removal and/or road construction. So, the Trump Administration's roadless rollbacks is completely unnecessary.

"There is a better way forward to avoid the kind of global outrage now directed at massive logging in Amazonia, as both the Amazon and the Tongass play vital roles in slowing down runaway climate chaos as the planet's "lungs."

"Thanks to funding obtained by Sen. Lisa Murkowski, the Forest Service already was on the path forward before the roadless distraction. The agency recently completed the most expansive young forest inventory ever on the Tongass. It inventoried over 40,000 acres of young growth, which was supplemented by field data supplied by the Geos Institute, and combined with additional inventory plots from the Forest Service Pacific Northwest Research Station. Collectively, these inventories uncovered a vast supply of young trees soon available to support an appropriately scaled forest industry without entering roadless areas or ramping up old-growth logging. "Analyzing the new data, Geos Institute identified some 138,000 acres of previously logged forests now stocked with young trees 55 to 70-years old within 800 feet of open roads and in relatively low environmental risk areas. Because of heavy logging in the past, these densely stocked young forests are poor deer habitat, but produce merchantable timber in volumes comparable to old growth logged over the last decade. By utilizing the existing road infrastructure, the industry can improve its economic efficiency by avoiding expensive road construction. Importantly, young growth stands are taller and bigger than expected (meeting Tongass Advisory Committee requirements for transition) and generate only ~2% wood product defect, compared to as much as 70% defect in old growth.

"Existing mills in the region will need to retool to handle the emerging smaller-diameter young growth logs instead of old-growth logs. Capital for needed renovations could come from public and private funding. And after three years of project design and field work by the Forest Service Research Station, paid with congressional funds secured by Sen. Murkowski, the next step is to establish a young growth wood quality pilot mill to test for lumber grade recovery and market demand.

"The bottom line is this - the Roadless Rule is popular in Alaska and the nation, and it's working.

"A clear path forward now exists to avoid regressive policies by jump-starting the transition to a modernized smaller-scale sustainable industry focused mainly on young growth. Opening roadless areas and ramping up old-growth logging would only increase Alaska's climate woes and put the Tongass in the same global spotlight as the ill-advised destruction of Amazonia."

3.I believe DellaSala's "Opinion" includes valid specifics, starting points for planners to consider for rewriting the Central Tongass Project #53098.

4.There's hypocrisy in continuing to offshore Southeast Alaska "local mill jobs" to Asia while elected official and industry representatives cry for more Tongass old growth logging. For decades, freighters bound for Japan, and more recently China, have been transporting Tongass round or lightly milled logs to foreign shores, supporting their "local mill jobs". I support Southeast Alaska small scale local mills.

5.The Forest Service has completed and excels at stream, watershed, and forest habitat restoration and should continue these projects without delay, as well as culvert replacement and road maintenance further reducing

stream erosion and slough off. These necessary and time-urgent maintenance needs should not be delayed by including them in timber harvest plans.

6. My 14 October 2018 comments on the Roadless Rule, specifically, Item 19, stated:

"Several years ago I attended the first Petersburg Ranger District "Forest Stewardship Program" meeting hosted by then Petersburg Ranger District/Deputy Forest Supervisor Jason Anderson. I asked whether the collective recommendations from these meetings would make it up the chain of command within the Forest Service? He advised "probably not" as the higher-ups had their own set of priorities. To another question regarding "productive habitat for deer and other forest dwellers" that was being eliminated on Kupreanof Island, the South Lindenberg Peninsula in particular, by continued extensive clearcutting, including the elimination of leave strips, he said the Forest Service "managed the forest for timber harvest not productive deer habitat". I did not return for subsequent meetings since "public comment" was not going to be considered in the decision-making process. Reflecting on the call now for public comments on the "new" standalone Roadless Rule for Alaska might simply be another "box" checked off for "public comment"?

7. I attended the 4 September 2019 afternoon Subsistence Public Hearing. Following I found myself in a discussion with Petersburg District Ranger Ted Sandhofer. I recounted my conversation with Jason Anderson (noted in Item 6 above) to which Mr. Sandhofer said "he should not have said that". Discussing Project #53098, Mr. Sandhofer suggested I not choose the "No Action" alternative "as there will be harvest". I silently wondered how he knew that ahead of any decision-making? I did ask if the Forest Service had looked into carbon credits versus continuing logging of old growth as a method for securing annual funding for the Tongass, similar to Sealaska? Mr. Sandhofer said it was not a Congress-approved method like the logging contracts. I mentioned the continuing rise in temperatures worldwide, in Southeast Alaska, often referenced as climate change-he said he wasn't so sure. He suggested I attend the evening session and provide comment, go on record (I learned later the Public Hearings were NOT electronically recorded by the Forest Service). I offered that I had previously attended meetings, submitted comments and logging of old growth had continued. "Effectively, "box" checked off for "public comment"?"

8. The Forest Service must become a team player with a worldwide vision by acknowledging the Tongass is an invaluable carbon sink and every clearcut logging of old growth, every new road further reduces this once intact temperate old growth rain forest. Yes, the Tongass is but a piece of the puzzle that constitutes this temperate old growth rain forest with neighbors that include the Alaska Mental Health Trust, Sealaska Corporation, and the University of Alaska. Together these landholders and any others intent on clearcutting are impacting the larger world scene. There is physical scientific evidence, worldwide, to continued drought and desertification, seawater infiltration into freshwater bodies, rising sea levels including here in Alaska and the Lower 48, rising summer and winter temperatures, melting glaciers, earlier snow pack melt which also impacts/affects flora and fauna (adaptation), reduced multi-year sea ice accumulation, reduced summer ice flows in the Arctic, increased forest fires, reduced air quality, etc. The article "2°C: BEYOND THE LIMIT - Extreme climate change has arrived in America" by Steven Mufson, Chris Mooney, Juliet Eilperin and John Muyskens (13 August 2019) includes -"Alaska is the fastest warming state in the country . . ."

- "The warming of Alaska was treated separately, after consulting with Rick Thoman, an expert on the state's climate at the University of Alaska at Fairbanks. Thoman said that a linear trend does not apply in the case of this state because the warming has been so extreme in the most recent years - something that such a trend would understate. So Thoman used a smoothed curve to plot Alaska's warming trend, calculating about 2.2 degrees Celsius (4 degrees Fahrenheit) just since 1925."

9. The Forest Service's 50-year contracts on the Tongass resulted in volumes of same-age tree stands. It's 2019 and time for the Forest Service to schedule its activities to include this valuable and accessible second growth resource, thus safeguarding the remaining Tongass old growth and its productive habitat for all.

10. I support the "No Action" alternative for the Central Tongass Project #53098.