Data Submitted (UTC 11): 9/16/2019 4:10:55 PM First name: Bruce Last name: Campbell Organization: Title: Comments: To whom it may concern at the Tongass National Forest and beyond:

This is my comment on the massive "Central Tongass Project" which proposes to further fragment the largest and most important national forest in the nation and the most important temperate forest in the world.

I note that the Acting Forest Supervisor claims that "watershed management, recreation management, vegetation management, and access management" are the purposes for submitting the proposal. Please use basic common sense here... Please note that the only reason that any of these four topics might be considered necessary is due to some extreme damage done by previous clearcutting (or damage to be done by clearcutting proposed in the DEIS).

Hey, natural watercourses do not need management activities (and clearly many watersheds will deteriorate in terms of water quality and in terms of habitat function if the Central Tongass Project is carried out), recreation will clearly be negatively impacted by aggressive management activities, there is no need for vegetation management in pristine areas (it is the disturbed areas often related to roads and logging where the non-native invasive species appear), and while one could contend that "access" would be improved since oftimes one can walk across a clearcut area more easily than through ancient forests, yet most tourists would go to the area to see large trees and some wildlife species rather than want more "clearcut open space".

I object to the "conditions-based" NEPA analysis performed both for this Central Tongass Project. Remember that it was precisely this type of inadequate analysis which led to the court challenge of the Prince of Wales timber project.

The DEIS is essentially worthless without careful analysis of how site-specific conditions would be impacted by proposed activities.

It is preposterous and purposefully deceptive to not divulge which 43,000 acres (of the 82,000 claimed available for logging) will be targetted generally for clearcut logging.

It also needs to be pointed out that what is considered the "baseline" for the Tongass National Forest is changing. Not only has there been a recent attempt to remove the Tongass National Forest from the Roadless Area Conservation Rule, but the mostly pretty good Omnibus Public Lands bill unfortunately allowed some shady corporate tribal-types to be able to do more logging and other damage to the Tongass.

Clearly you need to do this document over again since it is basically meaningless if you do not identify the areas to be most impacted by logging and road-building activities. And when you do the DEIS over again, tell us where you want to road-build and clearcut, tell us specific impacts on waterways and on species of the area, and tell us how that will impact carbon sequestration, global climate, and the local, regional, and planetary hydrological cycle.

You will likely need to massively cut the acreage of what areas are proposed for management. In fact, it is quite apparent that this giant project was proposed in order to obfuscate specific as well as regional impacts on waterways, wildlife, and carbon storage. I notice that only 4 national forests (including the Tongass) are larger than the 3.4 million acres proposed in the Central Tongass Project. It would be preposterous for any of the other national forests to propose some vague proposal on the entirety of their national forests. Certainly do not include more than one ranger district in a single EIS!

Some wildlife depend on "interior forest habitat". The Tongass has lots of islands so despite having a decent amount of acreage in a pristine state, it does not provide the interior forest habitat that one might expect. Thus, it is even more important to protect the ancient forest areas to prevent further fragmentation of this vital area for the planet.

I note that the Tongass National Forest lowered "scenery standards" in a 2016 document. How does that relate to your proposed "recreation-management" for some of the Central Tongass area?

In conclusion, do not carry out this vague and deceptive plan which would decimate pristine waterways and ancient forests in the most important temperate forest in the world! Trash your pathetic document and follow basic environmental laws!

Sincerely yours,

Bruce Campbell