

Data Submitted (UTC 11): 10/17/2019 8:00:00 AM

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Organization:

Title:

Comments: Thank you for the opportunity to comment on the Proposed Rule regarding Roadless Area Conservation in the NFS in Alaska.

I am writing to express my extreme dissatisfaction with the proposal to adopt Alternative 6.

It is a shortsighted and special interest-serving alternative that is detrimental to the health and sustainability of old growth ecosystems in the Tongass National Forest.

Our limited understanding of the resiliency of these temperate, biomass-rich forests, especially in the face of rapidly changing climatic conditions, requires land management agencies to be diligent in their decision making and its possible impacts.

The decision to adopt Alternative 6 is a clear attempt to make it easier to allow timber companies and small groups of associated stakeholders to monetize the biological productivity of these ecosystems for exploitative uses with little regard for the longer term ecological or societal impacts.

I do not have a problem with logging on NFS land, per se. However, I believe there is an enormous problem with the way the FS assesses timber sales and land management in general- that being the concept of meeting targets based on acreage.

I base my perspective partially on ten years spent as a federal wildland firefighter (with duty stations in Regions 2, 3, 5, 6, and 8) during which I saw countless examples of forest and rangeland management practices that resulted in out-of-balance (i.e., non-resilient) conditions in ecosystems.

There are numerous salient potential conflicts and poor outcomes in opening Roadless Areas to timber harvest.

I STRONGLY OPPOSE opening any old-growth forest to harvest, road building, or any other sort of commercialization. But that is exactly what will happen with this rule.

I was told in the first week of my first FS job (1998, GS-5 hydro tech on the Wenatchee NF, surveying slope stability for a very large restoration/thinning project) that "reality is what happens in the field".

That project was meant to deal with the problem of regen pine and fir species crowding out understory (a result of the absence of low-moderate intensity fire recurrence) on previously logged FS lands. The idea was to thin the understory, re-establish fire, and allow the larger trees to re-establish themselves at lesser stand density more akin to the pre-logged stand conditions. Lots of logging, piling, milling, chipping, etc... (removal of biomass) of the small stuff.

One area had understory trees large enough to log and mill (12-16" DBH). The area to be cut was on a slope, with the skidding operation set on a pre-existing road on a ridge above the slope. This ridge had a couple very large Ponderosa pines (35"+ DBH), which were pretty much the model specimens for what the stand dominating specimens should be after treatment. Well, even though these trees were not in the treatment area, the loggers chose to build their landings where these trees stood, so they could harvest them as well. The best laid plans...

The problem is not exclusive to loggers, it is just more symptomatic of the effects man has on trying to manage nature for nature's benefit. Having supervised many suppression and firing operations on wildfires, I can assure

you that we did more damage to ecosystem resiliency with how we fought fires than the fires would have done on their own.

The moral of these stories is that if there are particularly well functioning landscape (e.g., old growth ecosystems such as the islands and true roadless areas in the Tongass), it should be left alone as much as possible, because the benefit will be short lived and the harm likely irreparable.

We know that Alternative 6 is basically opening the door to some old growth logging, and I, as a taxpayer, and as a former civil servant dedicated to proper land management practices for present and future generations of Americans, simply cannot abide by that

It seems I missed my window to comment earlier on how Alternatives 1-4 all seem like better decisions if a rule change is to be made, so I include that sentiment here now as well.

Thank you for your time.

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