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Comments: December 15-16, 2019

Alaska Roadless Rule

USDA Forest Service

P.O. Box 21628

Juneau, AK 99802

Re: Comments on DEIS on Alaska Roadless Rule Docket FS-2019-0023

To whom it may concern at the U.S. Forest Service and beyond:

The environmental impact process under NEPA is legally expected to offer a reasonable range of alternatives. However, there were no clearly environmental alternatives - since the documents make it clear that there are many exceptions in the 2001 Roadless Rule. (Thus, Alternative 1 is the best of the alternatives offered.) In the supplemental Draft EIS, please come up with an alternative which would uphold the 2001 Roadless Rule, allow considerably less exceptions that permit destructive activities on the Tongass, plus include some old-growth stands surrounded by a sea of clearcuts, as well as some non-inventoried roadless areas under the umbrella of 2001 Roadless Rule protections. Thus please offer an alternative in a supplemental draft EIS that improves Alternative 1, but beware of the poorly named "Roadless Priority" ARAs portion proposed in Alternative 2, 3, 4, and 5!

Hereafter, I call for the differentiation in all Tongass National Forest documents between "islands" surrounded by the sea, and "islands" in relation to isolated old-growth stands amidst a sea of clearcuts. I realize that most, but not all, references in the DEIS document and Executive Summary are related to islands of timber.

I thought I was fairly familiar with the 2001 Roadless Rule, but in doing related research for this comment on the DEIS on the so-called Alaska Roadless Rule, I sadly discovered that almost any pathetic excuse is used to be able to construct or reconstruct a road to almost anywhere! While the 2001 Roadless Area Conservation Rule was still the crowning achievement for the Clinton Adm. in relation to the environment, but one would hope that protection would mean actual protection rather than merely being a word that is used to look impressive while actually being full of holes like Swiss cheese. I was also surprised to read in the official documents that a good

percentage of the Tongass National Forest is not forested -- particularly note Table 3.3a-1 which is called "Major Cover Types on the Tongass National Forest by Biogeographic Province (NFS Lands Only)" as well as the "Unproductive Forest and Non-Forested Lands" section which says that "Approximately 40 percent of the Tongass National Forest consists of non-forest lands (Table 3.3a-1)". Thus, the forested areas, and particularly the old-growth forested areas of the Tongass, need actual protection from roading, logging, drilling, and mining abuse, rather than just use the word to try to get away with a ploy to dismember the system of somewhat protected roadless areas. I am also quite disturbed about the huge amount of acreage that apparently is going to be logged even under the seemingly protective umbrella of the 2001 Roadless Rule - this shows that sad compromises were already made in coming up with that roadless rule, and then there was an interim judicial phase where timber managers tried to liquidate many forests before roadless regulations kicked in.

I do not believe the second sentence in the Executive Summary which says that "This Draft EIS (DEIS) discloses the potential environmental consequences that might result from the proposed actions and alternatives." This document obfuscates environmental impacts, and particularly cumulative environmental impacts. One cannot pretend that the same number of board feet will be cut, the same number of road miles will be built, and there will be no difference in the impact on wildlife species under each of the alternatives including the No Action Alternative.

While Alternative 2 has an ecologically reasonable proposal to add old-growth stand steppingstones to a potential Alaska Roadless Rule, yet sadly Alternative 2 would convert "a net of 18,000 old-growth acres and 10,000 young-growth acres, previously identified as unsuitable timber lands, to suitable timber lands". Another huge negative impact of at least Alternatives 2 through 5 (and very likely Alt. 6 too) is what is referred to as "Roadless Priority". Seeing that the so-called "Roadless Priority" Alaska Roadless Areas are admitted to be "less restrictive" than the 2001 Roadless Rule as far as what habitat-destroying activities are allowed. What may be most disturbing - yet hardly mentioned in the documentation - is that the so-called "Roadless Priority ARA" "provides for infrastructure development to connect and support local communities, and road construction / reconstruction for access to renewable energy and leasable minerals." It goes on to say that "The leasable minerals exception provides for geothermal, oil, gas, and/or coal development." How will such drilling and mining activity impact habitat for rare species? Basically, get rid of the so-called Roadless Priority ARAs since they are a contradiction in terms, and since they are ridden with loophole exceptions even to the extent of allowing such things as fracking and coal-mining on this precious national forest. Certainly it is a no-brainer to insist that there be careful analysis of likely shifts in air and water quality, in species habitat, and in carbon sequestration and oxygen production if new roads were allowed in roadless area to access often quite toxic mines. Please do so in that Supplemental Draft EIS that I call upon you to research and churn out.

Seeing that the Forest Service is part of the administration of the King of "Fake News" who obviously learned to tell "Big Lies" (as in re-inventing reality) as part of his obsession with Nazi propaganda books which he kept on his bed-side table, it is not totally surprising that up is down and left is right in terms of the claim that USDA truly "desires a durable and long-lasting regulation for the conservation and management of roadless areas on the Tongass". This is an incorrect claim - the proposal is to eliminate (under Preferred Alternative # 6) roadless protections or to at least dismember the crowning achievement of the Clinton Presidency, the 2001 Roadless Area Conservation Rule, due to pressure by extractive industries on the State of Alaska and other beholden elected officials!

In the section explaining why some advised alternatives were not researched, it says that the "Giving management of the Tongass to the State of Alaska" "alternative was eliminated from detailed study because it does not respond to the purpose and need, which is to consider options for a state-specific roadless rule that will better incorporate the economic interest concerns and statutory requirements while conserving roadless area characteristics". That is right, things like habitat, carbon sequestration and oxygen production are afterthoughts - this document is a result of greedy interests in the State of Alaska. I call for an independent investigation into the e-mails and other correspondence involved between extractive industries and the Alaska governor office which was the origin of this proposal to eliminate the RACR for the Tongass National Forest. Perhaps such correspondence will expose the truth about what was behind this major shift to dump the federal roadless rule. Then put that as your supposed "Purpose and Need" in a supplemental Draft EIS document.

Under the Tongass Land & Resource Management Plan, it says that "The proposed Alaska Roadless Rule would supersede direction in the Tongass Forest Plan." However, if the preferred alternative is chosen, there will be no Roadless Rule relating to the Tongass National Forest - thus no "Alaska Roadless Rule" either! Yet another part of the document seeks to assure readers that you don't have to worry about roadless forests and related species losing their protection because the Tongass Forest Plan would remain in place to guide management. WHICH IS IT?

It seems to me that there is no Alaska Roadless Rule (at least applying to the Tongass National Forest and this DEIS) unless Alternative 2, 3, 4, or 5 are chosen.

I have never seen such laziness (if not laziness, deceit!) in the preparation of a NEPA document which pretends that the same amount of board-feet, the same length of roads, and the same impact on wildlife will occur under every alternative!!!! This fact alone should result in the total tossing of this document, or get to work on a more honest supplemental DEIS document!

Projected timber board-feet is often inflated in general in Forest Plans as compared to reality, and thus using an exaggerated figure for alleged Tongass timber board-feet apparently was a pre-requisite to the preposterous claim that everything will be the same no matter the alternative in terms of timber volume, road mileage, and species habitat. Excuse me, I know this is not popular among some leaders in the Executive Branch these days, but try to integrate that pesky thing called S C I E N C E into your documents! There is ZERO SCIENCE related to claims that all alternatives will basically result in the same outcomes in terms of timber volume, road mileage, and quality of species habitat.

There are preposterous claims several places in the document that they don't need to touch the Tongass Forest Plan because all impacts and road mileage and board-feet will be the same under all alternatives. Besides being concerned about the preposterous claims that everything will be equal no matter what the alternative, if this was actually the case, then there was no reason to embark on examining a possible Alaska Roadless Rule except for pressure by industry on the State of Alaska to get their old boy power-players to dismember roadless protections in our nation's largest national forest. I noticed a couple places in the document where it says that if the timber

cut is not meeting its targets, that there can essentially be a frenzy of logging later in the decade (decade beginning with Tongass Forest Plan of 2016) to make up for smaller than estimated timber volumes in earlier years of the decade. I see no analysis in the DEIS in regards to this short-term liquidation to get the estimated cut board-feet out. Such analysis needs to be a key component of a supplemental draft EIS. I notice the admission in the 3rd section of the DEIS under Cumulative Effects that the document says: "Note that the actual amount is less than that projected under the Forest Plan FEIS, and may continue to be less under all of the alternatives (see the Timber section of this DEIS for additional discussion)."

This document would be a lot more meaningful if had "detailed analyses of landscape connectivity and fragmentation [that]are typically conducted at the project level where individual patches of contiguous old-growth forest habitat and movement corridors can be identified", rather than vague assertions that the connectivity will suffice to maintain viable populations of wide-ranging species no matter what action alternative is chosen.

I notice under Appendix G at the bottom of the online FEIS document that all sorts of mostly bogus excuses are used to be able to build roads despite alleged protections being in place for roadless areas under the 2001 Roadless Area Conservation Rule.

There needs to be a lot more clarity in regards to the noted "transition" that will take place shifting logging to younger growth on the Tongass National Forest. Numbers such as 10 years, 15 years, and 16 years were used. When will the phase-in to younger growth begin? While generally focusing on logging younger growth is a positive development, however I noticed that even under younger growth logging there is language allowing focusing on the larger trees within the given land unit even though it is generally younger-growth in the area. This are some of the same pathetic commercial forestry practices that has resulted in removal of old-growth to then focus on concentrated replanting of monoculture conifer seedlings in overstocked plantations which are a serious fire hazard in forests further south - while fires seem to be reaching more forests further north toward the Arctic than the normally frequent. Also, while the document admits that the larger trees of the younger growth will be focused on first - unless they just mow /clearcut it all down, yet I did not see in the DEIS as to how much old-growth forests would still be roaded, logged, and even fracked/mined even after the transition to younger-growth logging began.

I like the wording under "Key Issue 1 - Roadless area conservation" in regards to the importance of the Tongass National Forest. "The Tongass includes large undeveloped areas, with several portions of the Forest consisting of contiguous roadless areas that exceed one million acres and represent large blocks of unfragmented wildlife habitats, undeveloped or natural areas, and opportunities for primitive recreation and/or solitude. This large scale of roadless area, including wildernesses and national monuments, does not exist anywhere else in the NFS outside of Alaska. The Tongass is the largest national forest in the United States, and the majority of the Tongass is in a natural condition, unlike most other national forests. It represents one of the largest, relatively intact temperate rainforests in the world. Also under the Key Issue 1 heading are 3 sentences discussing the ecosystem services that the Tongass National Forest provides: "Ecosystem services represent the services provided to society by healthy ecosystems. These services and benefits include what some consider to be long-term life support benefits to society as a whole. Examples of ecosystem services include watershed services, soil stabilization and erosion control, improved air quality, climate regulation, carbon sequestration, and biological diversity."

I did not notice (in the parts of the DEIS that I read) any specific mention as to which DEIS alternatives would allow road-building entry to cause fragmentation and thus damage to habitat in those several portions of the Tongass which feature contiguous roadless areas totaling more than a million acres. How many of the alternatives would fragment the large contiguous roadless areas on the Tongass? The DEIS does admit that the Preferred Alternative / Alt. 6 would rank lowest in terms of acreage of roadless areas designated. Then it claims that Alternative 6 would still be "moderate" in terms of overall protection. Allowing the most ancient forest habitat to be declared suitable for logging of any of the alternatives is not "moderate" protection but a dangerous assault not only on local resources and habitat, but also on essential ecosystem services for complex living beings (including humans) on Planet Earth. The part of the document which claims that less than a certain amount of financial damage to people from management activities would occur from such activities clearly have not considered the inestimable damage that is already happening from further destabilization of climate and of the hydrologic cycle. Due to accelerating ocean acidification, the algae in the ocean will mostly die before the year 2050, and thus other sources of oxygen (trees and plants) will become in great demand (if we can breathe enough during the transition). Impacts due to ocean acidification, due to ice-caps melting at a much faster rate than predicted, and due to other recent madness such as burning much of the Amazon followed by the Trump Adm. taking a key climate-related step in the USA. But that climate step was in the wrong direction, and the step was calling for elimination of the Clinton Administration's Roadless Area Conservation Rule in relation to the 16.7 million acre Tongass National Forest in order to help extractive industries in this vital area of the planet for temperate rainforest conservation.

Under "Key Issue 3 - Conserve terrestrial habitat, aquatic habitat, and biological diversity" The document says that "The Old-growth Habitat Conservation Strategy was developed to maintain the integrity of the old-growth forest ecosystem, and thereby conserve biological diversity across the Forest by retaining intact, largely undisturbed habitat." That sounds good except that the steppingstones of old-growth involved with some of this conservation strategy are insufficient as far as connectivity for species such as the Prince of Wales flying squirrel. Biologists have already noted excessive fragmentation in many areas of the Tongass NF which interferes with providing steppingstone dispersal habitat for the Prince of Wales flying squirrel. This species is noted for its strong preference for the "lowest level of fragmentation than elsewhere on the landscape" (Pyare et al 2010). A quote from DEIS Section 3 says, "some biologists suggest that many reserves on Prince of Wales Island may be too small or spaced too far apart to support populations of Prince of Wales flying squirrels over the long term or maintain functional connectivity to support a back-and-forth between flying squirrel populations (Pyare and Smith 2005; Smith et al 2011)." Yet the Forest Service was pushing a huge old-growth timber sale on Prince of Wales island despite biologist concerns that Prince of Wales flying squirrel habitat is already too fragmented to support the species survival long-term.

Another important rare endemic species is the Prince of Wales spruce goose, who also happen to be prime prey species for the goshawk and for martens, also has serious dispersal issues. The DEIS notes that "Timber harvest and associated fragmentation may lead to population declines if open areas are too large or forested patches are spread too far apart to enable spruce goose to move between them (greater than 1 mile). Clearcuts may present a dispersal barrier to this species due to the thick logging debris often present which could inhibit walking, this species' preferred method of movement (Russell 1999)." It also warns that road systems bring more hunters who like to shoot spruce goose, so please make that a consideration when considering various road projects on the Tongass. Thus, the spruce goose (and some associated goshawk and marten) will see a deterioration of their habitat or prey species under not only all action alternatives, but will even be strained under all the logging

somehow included in the 2001 Roadless Rule.

I imagine that some areas roaded and logged/exploited under Alternative 5 would generally also be roaded and logged/exploited under Alternative 6. The write-up in the DEIS on Alternative 5 warns of decreasing biological diversity due to fragmentation particularly in the North Central Province of Prince of Wales biogeographic province, as well as in the Kupreanof/Mitkof Island, and in the vicinity of Etolin Island due to logging proposed under this Alaska Roadless Rule DEIS which would see their old-growth trees reduced by 2 to 3%. I see a disturbing sentence that reads, "Assuming harvest patterns follow the distribution of suitable old-growth, the provinces where harvest is likely to increase more than 200 acres over 100 years include East Chichagof Island, East Baranoff Island, Kupreanof/Mitkof Islands, Central Coast Range, Etolin Island & Vicinity, and Revilla Island/Cleveland Peninsula." Well, so much for transitioning to younger growth if it is assumed that loggers and their damaging machinery will "follow the distribution of suitable old-growth" rather than really focus on a transition or on protecting habitat.

All action alternatives convert tens of thousands of acres to hundreds of thousands of old-growth forest acres into areas declared suitable for timber production - while even the Roadless Rule itself was weakened by Alaska influence to allow all sorts of damaging activities. Please improve Alternative 1 partially by adding old-growth forest islands amidst clearcuts as an Alaskan interpretation of the 2001 Roadless Rule so that fragmentation does not increase anymore in this global treasure known as the Tongass National Forest.

Sincerely concerned,

Bruce Campbell

P.S. Despite this very form that I am typing upon saying that comments are requested on December 17th, I have just tried to send my comments a few times, but only have gotten as far as the I'm not a robot part, then I clicked on Submit again (and again), but nothing happened as far as sending my comments to the Tongass official.

I checked on the afternoon of December 16th, and was informed that Robin Dale of the Ecosystem Planning Staff who is Project Coordinator regarding the Alaska Roadless Rule process reminded this fellow that comments will be taken through about midnight on December 16th. I actually was going to send some of my comments before midnight Pacific coast time, but did not find an e-mail address. I could sure use such an address because I appear unable to send my comment using this electronic form. I did just click California under "State" and eliminated it where it somewhat automatically appeared under Province/Region. I'll try that I'm not a robot, and will try one more time this morning. (I will call Alaska later in the day if I am unsuccessful.)

[POSITION]