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First name: Michel
Last name: Anon
Organization: Council on Intelligent Energy and Conservation Policy
Title:
Comments: CIECP & PHASE Comments to USDA Forest Service Draft Environmental Impact Statement on Alternatives to a Proposed Alaska Roadless Rule

December 17, 2019

Comments of Council on Intelligent Energy and Conservation Policy (CIECP) and Promoting Health and Sustainable Energy (PHASE)

Re: USDA Forest Service Draft Environmental Impact Statement on Alternatives to a Proposed Alaska Roadless Rule

Via email to: akroadlessrule@fs.fed.us

Dear Department of Agriculture:

We strongly support Alternative 1 of the proposed Alaska Roadless Rule, to wit, for the U.S. Department of Agriculture (USDA) to take no action and leave all of Alaska under the 2001 Roadless Rule, including the Tongass National Forest. Beyond that, we urge the USDA to favor the more protective other alternatives. All key watersheds and the Tongas National Forest should be protected to the utmost extent possible from road construction and logging activity. The Tongass is a critical sink for atmospheric carbon and one of America's greatest natural treasures.

Placing the governmental imprimatur of any level of destruction and despoliation of one of our - and the world's - last truly pristine areas would be reprehensible.

The world is losing biodiversity at a rate seen only during mass extinctions. All indicators paint the same picture of severe declines, unprecedented ecosystems destruction, a growing threat to our freshwater and marine habitats, and fragmentation of natural systems detrimentally affecting species' food availability or reproductive performance. (Barrett)

Intact (not fragmented or degraded) ecosystems provide a multitude of crucial services.

Wild areas are the only places that contain mixes of species at near-natural levels of abundance. They are the only areas supporting the ecological processes that sustain biodiversity over evolutionary timescales. As such, they are important reservoirs of genetic information. "Moreover, models based on geography, rainfall, degree of deforestation and so on are starting to reveal the degree to which wilderness areas regulate the climate and water cycles - locally, regionally and globally. Such areas also provide a buffer against extreme weather and geological events." (Watson)

"Wild places are facing the same extinction crisis as species. Similarly to species extinction, the erosion of the wilderness is essentially irreversible. Research has shown that the first impacts of industry on wilderness areas are the most damaging. And once it has been eroded, an intact ecosystem and its many values can never be fully restored." (Watson)

In addition, allowing more roadway intrusion and logging activity in Alaskan wilderness areas will contribute to the risk of wildfires, a risk that the US Forest service is, no doubt, well aware is dramatically increasing. As stated in the Climate Science Special Report issued as part of the Fourth National Climate Assessment: "[T]he incidence of large forest fires in the western United States and Alaska has increased since the early 1980s and is projected to further increase in those regions as the climate warms, with profound changes to certain ecosystems." (Fourth National Climate Assessment)

Our planet is already under siege. Please be true to your mission and provide leadership on natural resources based on sound public policy and the best available science. Please protect Alaska for our generation and the generations of Americans to come.

Respectfully submitted

Council on Intelligent Energy and Conservation Policy

Promoting Health and Sustainable Energy

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Fourth National Climate Assessment, Chapter 8: Droughts, Floods, and Wildfire, Climate Science special Report 4th US National Climate Assessment, Vol. 1, 2017. https://www.globalchange.gov/sites/globalchange/files/072618_NOAA_USGCRP_CSSR%20seminar_Wehner_Droughts%20Floods%20and%20Wildfire.pdf.

Watson JEM, Venter O, Lee J, Jones KR, Robinson JG, Possingham HP, and Allan JR, Protect the last of the wild, Nature (2018); 563: 27-30. doi: 10.1038/d41586-018-07183-6.

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