Data Submitted (UTC 11): 12/17/2019 9:00:00 AM
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Organization:
Title:
Comments: Comments re: Tongass Roadless Rule

Hello-

Thanks for reading this, and all the comments contributed by others.

I am a resident of Southeast Alaska, and have depended on the Tongass National Forest for its wild, ecologically healthy, unlogged virtues.

I have benefitted from the roadless forests of the Tongass economically, as well as for my family's subsistence, emotional and psychological health, and religious and spiritual foundation. My uses include parts of every major island and many mainland areas from Cape Fox and the Dixon Entrance to the northern Lynn Canal.

I urge you to select the "no-action" alternative, thereby retaining the current Roadless Rule, and maintaining the current levels of protections for forests and soils within the Tongass National Forest.

Selecting any degree of exemption from this rule is irresponsible and against the public interest for a variety of reasons:

-If an exemption alternative is selected at this time, it will create a legal situation that will certainly result in the Forest Service and/or the USDA being sued by numerous parties. This is inefficient, and wastes time and money on both sides of such a lawsuit, including wasting taxpayer monies. This would be irresponsible, wasteful management of the public, governmental infrastructure. And it would still not result in actual removal of the Roadless Rule on the Tongass.

-A vast body of science supports the understanding that lands maintained in roadless condition are demonstrably better at providing ecosystem services, maintaining biodiversity, and retaining sequestered carbon. All three of these benefits are directly in the public interest. It is the duty of the USDA to support the continuation of these benefits to the public to the best of your ability.

-The EIS fails to account, either in metric or narrative form, for the different impacts to biodiversity and carbon sequestration from the different proposed alternatives. A given amount of logging harvest (e.g., 46MBF/year) can actually have widely different impacts to these values depending on whether or not it is accompanied by the increased soil disruption and forest fragmentation caused by additional roadbuilding. Failure to acknowledge and describe these differences renders the EIS scientifically unsound and invalid. The only decision that can responsibly be taken on the basis of this unscientific document is No-Action.

-Cumulative impacts to atmospheric carbon levels would be increased by any logging of old-growth forest on the Tongass. Despite confusion on the issue caused by misinformation from logging industry PR, logging of old-growth forests releases substantially more carbon to the atmosphere than selective logging of young, small-tree forests. The momentum of unbiased studies has now established this to clearly be the case, due to disruption of ancient soils (which actually contain more carbon than aboveground biomass), as well as the exponentially greater amount of non-lumber biomass which is disturbed by old-growth

logging.

If such logging is accompanied by increased roadbuilding, than the cumulative impacts to atmospheric carbon become even greater. Because the EIS fails to even acknowledge this fact, let alone properly quantify it, the document fail to satisfy federal legal considerations, as well as being scientifically unsound.

-From a management perspective, the Tongass must be regarded as a cathedral of life. The Tongass is the nation's best remaining example of a healthy, wild, living, forest ecosystem. It is our nation's best treasure in terms of biodiversity and carbon sequestration. Treating it as a source of base fiber, or money, is to assault the sacred nature of our Earth, and of life itself.

-The land area of the Tongass National Forest was forcibly taken from the Tlingit people, without any treaty or other sufficient agreement between the nations involved. Therefore these lands actually remain under the jurisdiction of the Tlingit people, including the Chilkat (legally known as "Chilkat Indian Village"). No action can justifiably be undertaken on these lands without the explicit, documented approval of relevant, traditional Tlingit leadership.

Thanks for your time,

Nicholas Szatkowski

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