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Organization:
Title:
Comments: Comments. Roadless DEIS

To whom it may concern.

I empathize with the employees of the USFS. You are the best. I know you care deeply for the conservation of our precious public lands. I had a wonderful 35 year career in the agency. I was on the 2001 roadless core team. I worked on the Tongass for over 15 years in staff and leadership positions. Thank you for your service!

I have several concerns with the "Alaska" roadless DEIS (R10-MB-867a October 2019).

The agency preferred alternative does not meet the stated intent of providing a "long-term, durable approach to roadless area management[hellip]". This alternative promotes the continued fight over clearcutting the best, biggest old growth trees. People in SE Alaska are tired of the fight. Game over. Move on to productive use of our collective energy and resources. Hundreds of person years have been invested in collaborative stakeholder efforts to find common ground leading up to the Tongass Plan revision and the "Alaska" roadless plan. This alternative disregards the interests of the people of SE Alaska and guarantees the fight will continue. Stop feeding the fight.

The analysis fails to adequately address the environmental effects of opening up new areas to clearcutting old growth. For the most part, the focus of the timber program has been on harvesting the biggest, best and most accessible old growth. This has been going on for well over 50 years. The result is there are relatively few truly high quality large trees left in places like Prince of Wales island and other intensively managed areas of the Tongass. The agency will argue that the Tongass is so big and there are so many trees that harvesting a few more won't matter. The DEIS fails to disclose the impacts on fish and wildlife habitat due to opening up roadless areas that contain the biggest and best old growth. This will no doubt shift the timber program to remaining high quality old growth areas. In the words of FS people on the ground, this Roadless DEIS is a give-away for Viking lumber on Prince of Wales island.

The DEIS effects analysis shows very little difference between alternatives. This is due to the inappropriate scale of analysis on the effects particularly on fish and wildlife habitat. The Tongass is big, so just about any impact comparison that uses the size of the Tongass may be shown to be insignificant. These arguments are like saying that the watershed effects of the Greens Cr mine are insignificant when compared to all the watersheds in the United State, or Alaska for that matter. This can be a convenient argument if you are trying to convince the public that your decision won't have an impact.

The DEIS argument that this roadless decision makes no site specific impact is a "cop out". The Tongass NF has invested thousands of staff years in mapping and analysis of timber harvest opportunities. The Tongass NF staff know where and how the timber sales will shift from lower quality trees to bigger, better old growth once the roadless areas are released. Your analysis failed to recognize that this decision will open the pathway to harvesting the best trees left (that the agency has full knowledge of and failed to disclose) and will result in significant associated losses of fish and wildlife habitat; particularly in areas like Prince of Wales that have been so heavily logged over so many years.

The No Action alternative best supports the people, economy, and ecology of SE Alaska.

Sincerely,

Jon R. Martin

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