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Organization:

Title:

Comments: Roadless Rule Public Comment

To the USDA Secretary of Agriculture or whom it may concern,

I humbly submit the following comments and inquiries regarding the Alaska Roadless Rule and its effect on the Tongass National Forest.

The Tongass is the northernmost tip of what was once a vast, primeval conifer-dominated temperate rainforest, stretching 3000km from California to Alaska. Now, after over a century of extractive industrial logging operations, the unentered, unlogged, undisturbed and intact areas that remain are few. Because of their rarity, the Forest Service's role in stewarding and protecting these areas is elevated to one of planetary significance.

The Roadless Rule garnered broad support when it was proposed. During public comments and hearings in Southeast Alaska, 95% of the public was in favor of the Rule. Since its approval nearly two decades ago, the plight of forests worldwide has only become more dire. At the same time, their protection is now even more urgent in the face of climate chaos threatening to destabilize life on Earth. Why would USFS consider nullifying the Rule in the Tongass when global deforestation has only worsened since the Rule was instated?

Compared to modern managed forests, unentered ancient forests are unparalleled in their ability to sequester carbon and to provide refugia for animal species.

Carbon sequestration:

Temperate rainforests including the Tongass are some of the most powerful carbon sinks in the world, capable of sequestering more carbon per acre than even the Amazon rainforest. Why, then, with scientists across the globe scrambling to design carbon sink technologies, would USFS sacrifice the natural carbon sinks under its management? Deforestation contributes to snowballing climate effects.

Refugia and habitat:

Does the USFS recognize that we are currently experiencing the sixth mass extinction? How does USFS management address the urgency of protecting habitat for both listed and unlisted species that are threatened by human population growth, development, industry, agriculture and forestry? The Tongass is home to multiple rare species.

The Queen Charlotte goshawk is one example. The US Fish and Wildlife Service declined to list Alaskan populations of the Queen Charlotte goshawk because it believed that the protections on the Tongass would protect the goshawk in that area. It did choose to list and therefore protect the goshawk on Vancouver Island. If the Tongass is opened to road building and logging, will the USFWS then choose to list the Tongass population of the goshawk? What restrictions are in place for each of the Alternatives 2-6 to specifically protect the goshawk? The goshawk deserves a "no take" attitude from the agencies overseeing management of its habitat. And the goshawk is only one example of many rare species that call the Tongass home.

I urge you to adopt Alternative 1 - to maintain the Roadless Rule in the Tongass. Roadless, unentered forest areas must stay that way! Please do not open the door to industrial logging in a pristine wilderness that contains

critical habitat. USFS holds in its hands the opportunity to preserve and steward the breathtakingly beautiful and ecologically unique great Southeastern Alaskan forests of the Tongass, providing habitat for future generations of rare wildlife species, natural carbon sequestration and respecting the innate right of nature to govern itself in perpetual balance.

Thank you for your consideration.

Respectfully,

Isabel Osheroff

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