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Comments:

Alaska Roadless Rulemaking #54511

The Roadless Rule should stay in place and not be weakened in any way in the Tongass and the Chugach. Roadless protections enjoy strong and widespread support in Southeast Alaska and nationwide.

I would like to support the comments of people in Gustavus objecting to roading in the Chicken Creek area and also to refer you to the Chichagof Island map of logged areas developed by Judy Brakel. This map shows an already significantly fragmented, logged and roaded area. Other areas in Southeast Alaska have not received a similar cumulative assessment. To quote from Judy's comment on this rulemaking:

Chichagof Is. As a whole has been heavily logged, although not as severely as Prince of Wales Is. I instigated and carried to completion a GIS map of Chichagof Is. showing logged areas (both USFS and Native corporation lands logging), non-timber areas (alpine, subalpine, muskeg etc.), and unlogged timber areas in 3 categories - low volume, medium volume and high volume - as of the late 1990s. This map is still available from me and probably also from The Nature Conservancy, Alaska office in Anchorage.

Without conducting a similar survey forest wide, impacts of changing the existing Roadless Rule cannot be carefully considered. The Forest Service needs to take a hard look at the cumulative effects of the last 60 years of logging on ANCSA, University of Alaska, State of Alaska, Alaska Mental Health Trust, and USFS land in the Tongass neighborhood prior to weakening protections to the remaining unroaded areas of the Tongass. There is no question that roads can be built under the existing rule. During the Juneau public meeting on this Rule, it was acknowledged by Kenneth Tu, the project leader for this process, that that new roads allowed under this rule would primarily be into old growth for the purpose of logging. This is utter bullshit. The history of the USFS on the Tongass has largely been one of "get the cut out", and very significant long term damage has been to the forest and particularly to the opportunity for long term sustainable logging. The cut has been too heavy and too focused on high volume areas for too long. The place has been hammered during the 50 years of my lifetime. This latest rulemaking is part of a long term shortsightedness by the Federal govt. in regard to the benefits of the place.

Roading into unroaded areas is particularly poorly considered in light of the immediate threat of anthropomorphic climate change. We need to protect the remaining intact and unroaded areas of rainforest for multiple reasons. For one, unroaded and unlogged areas are more resilient and more capable of withstanding stress than areas cut up by roads and clearcuts. Intact is stronger, healthier, and more durable. As Gordon Orians and Dominick DellaSalla noted in the March 15, 2018 edition of the Seattle Times:

Old -growth forests also play a vital role in helping to stabilize runaway global climate change.

The Tongass alone absorbs approximately 8 percent of the nation's annual global warming pollution. No other national forest even comes close, making the Tongass the nation's premier climate insurance policy.

Orians and DellaSalla's also noted that, " Clear-cutting ancient forests compromises special places, fragments wildlife habitat, introduces invasive species that compete with native species and pollutes drinking water supplies from chronic sediment runoff along roads." If I could have said it better myself, I would have, but I wholeheartedly endorse the obvious truth in their commentary.

My foremothers and forefathers came into Southeast Alaska a number of generations ago. I would so very much like to be able to hand to our successive generations an ecosystem as intact and productive as the one my European ancestor found on their arrival here. That is not possible, and the primary reason is the political economic policy decisions of the US Federal Government. This Rulemaking is the latest example. For decades we heard about the necessity of protecting the timber industry and timber jobs. What a bunch of

horsecrap. We sent round logs in the millions and created a centralized state-mandated corporate socialism economy with 50 year timber contracts to Outside and foreign interests. The federal government needs to lay off for once.

Leave the Roadless Rule intact!

Best regards, Aaron Brakel