

Date submitted (Alaskan Standard Time): 11/18/2019 12:00:00 AM

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Organization:

Title:

Comments:

To whom it may concern,

I live in the Tongass and I do not, in any way, support the current proposed plan to redact the roadless rule.

I understand, perhaps more than most, the need to balance resource extraction and resource preservation. I understand that timber is a resource, and that we have and will continue to exploit it for things that we want and need. I support logging operations when they are done responsibly and effectively. But the current preferred alternative (Alternative 6) goes too far, and needlessly strips this unique forest of protections.

I'm opposed to this projects for a multitude of reasons. The Forest Service has been shown by a non-partisan research group that their timber sales in Southeast Alaska actually cost money to the taxpayer overall. Sure there are some jobs provided but that number pales in comparison to the number of jobs in the fishing or tourism industry. There doesn't seem to be any motivation on the FS's part to encourage second growth logging. The demand isn't anything close to what it used to be for Southeast Alaska hardwood, why are we trying to sell these irreplaceable old growth forests?

But I understand that my opinions as a sole citizen are generally not considered, except maybe a tally in a column that gets ignored somewhere further up the line. But here's some non-opinionated science, hopefully you won't ignore this.

The draft EIS released by the FS is inexplicably short-sighted when it comes to environmental impacts. Laughably so. Perhaps intentionally so. Let's focus on fish and stream habitats, but recognize these errors are present in nearly every section.

"Overall effects to fish habitat are expected to be negligible under all alternatives, because of the strong protections to fish habitats provided by Forest Plan LUDs"...and the lack of old-growth harvest or associated road construction allowed in the T77."

All alternatives...how does that make any sense? The draft EIS goes on to state very clearly (Table ES-2) that Alternative 6 will ignore LUD II Priority sites and T77/TNC sites. How can the effects on fish habitat be minimal because we have these things in place protecting it, but also they'll be minimal if we ignore those protections and open everything to logging?

The FS mentioned during the meeting in Juneau recently that all proposed projects under the new alternative 6 would still have to follow best practice guidelines. But how many projects are turned down because they are deemed too much of an impact on fish habitat? Any? Have any proposed projects been turned down?

Here's the main thing that is not clear in the report. The draft EIS oscillates back and forth at whim between (and I am paraphrasing) "there will be no differences in roads/timber harvest under and of the alternatives". For instance it says that here: "New road construction would be similar under all alternatives because roads on the Tongass are largely developed in support of timber harvesting, and the PTSQ under the 2016 Forest Plan does not vary between the alternatives"

And then two paragraphs later: "Alternatives 1 and 2 would have the about the same amount of road miles as indicated in the current Forest Plan evaluation, ith Alternative 3 a slight increase over 1 and 2, and Alternatives 4, 5 and 6

similar with slightly more road miles than Alternative 3".

So alternatives 4, 5, and 6 are more roads than alternatives 3 which has more road miles than alternatives 1 and 2 but also they're all the same? It offers more clarity two pages later: "While a potential slight increase in

roads and potential harvest areas with associated effects to streams could occur, with the current project harvest remaining unchanged, harvest and road building in these areas would only occur, with minor exceptions, with an associated reduction in roads and harvest in other areas".

But this is a seriously flawed line of reasoning, and it's pervasive throughout the thinly veiled justification for Alternative 6. Here's the problem. Relieving previous pressure on one stream does not forgive destroying a new one. That's not how streams work, that's not how salmon work. Streams that have already been affected by deforestation don't just magically bounce back the next year. Recovery can take decades or hundreds of years, if ever. That sort of reasoning is grossly present in this draft EIS and any ecologist or anyone who has put a foot in the Tongass should know better.

I hope that somehow, someday the FS will see that Alternative 6 isn't an alternative, it's a complete reversal of decades of advancement in science and policy. It's a disgrace, and terrible idea, and it's a lie to present it as anything but a complete middle finger to the people of Southeast Alaska.

Sincerely,

John

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