

From: [McKinley, Duncan C -FS](#)
To: [Tu, Kenneth K -FS](#)
Cc: [Porter, Dixie L -FS](#)
Subject: RE: supplemental comments on Tongass DEIS and request for additional analysis on new information
Date: Thursday, April 2, 2020 5:25:12 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Ken,

In short, I don't think the addition of this study would add any relevant information that is inconsistent with what is reported in the DEIS and revisions we made for the FEIS.

The PNW publication mentioned in Dr Dellasalla's letter is a non-technical communication of McQuire et al 2018, which does present findings consistent with points 1-6 in the letter. However, the DEIS uses the best available science on carbon stocks and carbon fluxes caused by a variety of disturbances including harvesting, points 1-3, and 5. The DEIS uses the carbon baseline (USDA 2015) and disturbance assessment (Birdsey et al. 2019), which was done specifically for every national forest, including the Tongass. By contrast, the McQuire et al. (2018) article was done for the entire state of Alaska and does not report carbon stocks and dynamics specific to the Tongass. For example, the McQuire paper reports a potential sequestration rate of 3.4 to 7.8 tetragrams C on "north pacific" forests, covering over 37.5 million acres that include the smaller area of the Tongass. These numbers are entirely consistent with the baseline and disturbance assessments (0.6 Tg C yr for the Tongass). Because it's not specific to the Tongass like our assessments, it has limited value other than providing general context. If this article were included, however, it would only strengthen the agency's contention that the amount of carbon removed during harvesting is not significant; for example, historically, harvesting removes about 6 times less carbon than the amount of carbon added

on the Tongass every year with growth. Adding information that that similar forests are adding carbon at these rates would further illustrate the very small impact of harvesting on carbon in the Tongass relative to broader forest carbon dynamics. Points 4 and 6 are also addressed in the DEIS, which provide qualitative detail on carbon stored in harvested wood products and substitution effects, which the McQuire paper does not consider. In short, the inclusion of this “new science” adds no new information and does not alter any conclusions in the DEIS or draft FEIS.

Regarding the comparison of harvesting emissions with the entire US energy sector. The DEIS makes several comparisons: emissions relative to net growth (> 6 times less); emissions relative to total forest carbon stocks (harvesting removes less than 1/6000th of the amount of carbon on the forest annually); and national and global emissions (20,000 -150,000 times less). Any way you decide to look at it, emissions from harvesting are very small and expected to be small by interpolation.

Regarding mitigation, the USG and the Forest Service are not required to consider carbon mitigation options nor potential for management or NEPA.

Regarding the need to quantitatively assess each NEPA alternative. The extent of the NEPA analysis proportion of the magnitude of the expected effect, which is very small for harvesting in the Tongass. The DEIS cites relevant literature reporting harvesting impacts on carbon from a historical basis 1990-1995 and assesses harvesting in the disturbance reports from 1990-2011. Again, all the available information suggests that harvesting impacts on carbon stocks and emissions are too small to justify an additional analysis for this DEIS.

I think a response does not need to be point by point, but perhaps a high-level summary of these ideas. Are you thinking we'll need to write a formal response?

Best,

Duncan

From: Tu, Kenneth K -FS <kenneth.tu@usda.gov>
Sent: Thursday, April 2, 2020 10:40 AM
To: McKinley, Duncan C -FS <duncan.mckinley@usda.gov>
Subject: FW: supplemental comments on Tongass DEIS and request for additional analysis on new information

Duncan – sorry, I hit send prematurely on the last email. Can you take a look at this letter and let me know your thoughts and how you think we should handle? Thanks.



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Caring for the land and serving people

From: Dominick DellaSala [<mailto:dominick@geosinstitute.org>]
Sent: Wednesday, April 1, 2020 2:14 PM
To: Tu, Kenneth K -FS <kenneth.tu@usda.gov>
Cc: French, Chris -FS <chris.french@usda.gov>
Subject: supplemental comments on Tongass DEIS and request for additional analysis on new information

On behalf of Alaska, regional, and national conservation organizations, we are requesting that the Forest Service consider the new information on forest carbon stores obtained from its

own PNW Research Station but not properly analyzed in the DEIS. The new analysis supports prior carbon estimates on the Tongass that were not properly analyzed in the DEIS. We are requesting a supplemental analysis of these new carbon numbers.

Thank you for considering my request.

Dominick A. DellaSala, Ph.D | President, Chief Scientist

Editor and prime author "Temperate and Boreal Rainforests of the World: Ecology & Conservation" <https://islandpress.org/author/dominick-a-dellasala>

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