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Comments regarding draft EIS/PTEIR
associated with an application for an ITP for MRC's HCP, etc.

The EIS did not set forth the merits of the NAA adequately. By trivializing the importance of carbon sequestration by the biomass of this forest^{*}, it obscures the fact that the harvest in the first decade under the PA according to the estimates for CO₂ eq. tabulated on pS-13 would so adversely affect the forest in comparison with the NAA that subsequent decreased harvests would not compensate for it until the fourth decade, and then only marginally (as can be seen by summing the CO₂ equivalent for each decade with those before it for the NAA (pS-5, S-6) and the PA (pS-13) (i.e., the cumulative effects) and comparing them. (The difference for the fourth decade is only 1.75687% of 15513248 (the total for the PA then.)) The number of significant figures given in the tables is clearly exaggerated.

Given that "... accuracy of ... detailed future projection becomes less as the time horizon lengthens" (CFPR Art. 6.75, 1091.1(b) second paragraph), this negative impact on carbon sequestration is surer than the projected compensation some time in the fourth decade later (i.e., we have more reason to be confident of the sooner negative impact than on the claimed, much later positive impact).

Since the stabilizing effect of carbon sequestering by native biocommunities, especially currently and in the next few decades, is widely recognized to be crucial to maintaining the health of life on Earth, the PA would therefore appreciably reduce the likelihood of the survival and recovery of the species in the wild, and make the HCP much less feasible to implement with genuine success. Due to the PA, therefore, the HCP is clearly not acceptable, as required by section 10(a) ESA.

*Please see addendum

Since the biodiversity which is so essential to life on Earth is at the level of the native biota (e.g. flora, fauna), and not at the level of a current biocommunity at a specific site, impairing the natural succession process artificially is not a genuine benefit, even though it may increase the local current community's number of species. This is especially significant now, since the biocommunity's carbon sequestering increases as natural succession proceeds. Presenting the holding back of succession by application of herbicides as a benefit is therefore misleading and referring to that as "restoration" is equivocation.

These equivocations strongly indicate that relying on the proposals in the HCP to be implemented in the spirit of genuine conservation would be an error.

Concluding that the PA is the best alternative therefore does not have a substantial basis in fact. The claim that it has the least number of negative impacts diverts attention from the fact that its negative impacts are of overwhelming magnitude. The failure to acknowledge the carbon sequestering deficit in the crucial approaching decades (compared with the NAA) does not permit the decision maker to fully consider and balance the relevant factors properly. The obviousness of that deficit indicates compellingly that the EIS was not compiled in ^{objective} good faith, and that it did not set forth the NAA as a responsible alternative, though the NAA was a more responsible alternative than the PA.

If we (i.e. the USA) are to exercise true leadership in world affairs - and it is our responsibility that we do so - we must be exemplary in our conduct of environmental protection, being able to afford it (in the eyes of other nations, especially in the third world) more than other nations. We must not make a game out of the consensus to require environmental protection for sustained development. So this issue has national security and global security dimensions, which we need to address.

Degrading the forest for the first decade (under the PA compared to the NAA) cannot properly be a component of longterm

conservation. Issuing an ITP facilitating such initial degradation would be irresponsible. The PA would not only have negative impacts (locally, regionally and globally) of its own, but global social (including political and economic) impacts due to setting a precedent for long-term ITP's to be granted to projects whose surer consequences degrade the environment even if its proponents claim they will compensate for them by later action. Others in this country would be able to point to the precedent as grounds for having their own ITP's granted despite the increased environmental degradation of the project it would facilitate. The degradative effects of the PA not having been adequately considered in granting the ITP's would set a precedent that would make it increasingly difficult for the agencies not to grant unwarranted ITP's to others, which would easily facilitate a rash of destructive logging practices that would wreak havoc on the global carbon cycle. The third world nations - at least some of whom are only too happy to point an accusing finger at us - would have an additional excuse to not take seriously their responsibilities for environmental protection, resulting in irreversible damage to the biosphere and further damaging our credibility and leadership role in world affairs.

Thank you for your consideration of these comments.
Sincerely,

Frank Gregory

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Addendum

The importance of carbon sequestration is trivialized in stating that the "effects on climate change ... would be beneficial, but negligible given the relatively small amount of carbon sequestration on MRC's lands compared with the amount of carbon dioxide entering the atmosphere worldwide under all emission scenarios." (section 3.8.2.2, p3-433 EIS/PTEIR) Local carbon sequestration being relatively small compared with global carbon dynamics cannot make its effects negligible, since the global dynamics are the consequences of local effects. Management practices on Redwood Forest, which when allowed to develop naturally, has a biomass density which is among the highest for terrestrial community types, therefore cannot be considered negligible, especially when the forest is as extensive as the one being considered here.

The claim that "The enhanced riparian buffer widths may mitigate the effects of climate change on covered species and the habitats over time under the Proposed Action" (section 3.8.2.3, p3-435) presents as relevant an effect clearly much smaller than that of the total "amount of carbon sequestration on MRC's lands." The bias is clear. The statement (in section 4.8.2, p4-40) that "the enhanced riparian buffer widths for Class I and II streams are anticipated to result in higher levels of carbon sequestration than under the No Action alternative" further would be expected to give the impression to the reader that the PA sequesters more carbon than the NAA, which would be incorrect until at least the fourth decade, as presented in the relevant tables in appendix S.