Data Submitted (UTC 11): 9/16/2019 11:38:30 PM
First name: Malena
Last name: Marvin
Organization:
Title:
Comments: To Whom It May Concern:

Thanks for considering my comments on this Central Tongass LLA DEIS as a resident of Petersburg and operator of a local direct market commercial fishing business. I am recommending option 1 - the "no action" alternative.

Lumping fifteen years and potentially dozens of projects containing controversial old-growth clearcuts into a single comment period held over the height of the local fishing and tourism season does not give the community adequate time to meaningfully understand or respond to the scope of changes analyzed. As the National Environmental Policy Act (NEPA) intends, each of these significant actions should have meaningful public review in its own right. Speaking for our family, despite best intentions, it's just not possible for us to review and analyze and understand the potential ramifications from these alternatives, spread as they are over so many potential projects across so many islands and landscapes, during the height of our fishing season. This "landscape level analysis (LLA)" process meets neither the intention nor letter of NEPA as written.

The Forest Service should have considered the public interest litigation brought against the LLA in its initial use on the Tongass on Prince of Wales Island and refrained from repeating its use on the Central Tongass. During the public meeting on the CTLLA I attended on Sept. 4, 2019, Deputy Forest Supervisor Troy Heitheker dismissed public opposition to the POW LLA, stating that litigation is inevitable on all proposed Tongass projects. I strongly disagree and believe that updating project emphases to shift taxpayer subsidies away from supporting old-growth exports and instead toward restoration for fish and wildlife as well as improved infrastructure for visitors and recreation would garner broad-based public support. (Statutory obligations to meet the needs of "industry" could and should be reinterpreted or updated to include a "just transition" framework in which the two remaining major businesses dependent on industrial scale old-growth harvest--both of which are notably not based on the Central Tongass--are re-tooled, sunsetted, or otherwise modernized. Economically speaking, retraining this workforce--in stream restoration, for example--would likely be cheaper for taxpayers even over the short term.)

With as much as half of Tongass old-growth already clearcut, and considering the Tongass's slow rates of regrowth relative to Lower 48 forests, the dramatic increase in old-growth clearcuts over the last decade of harvest levels proposed in this LLA are ecologically unsound. Over the last few decades our region has moved away from this unsustainable, "boom and bust" style of management thereby reducing social conflict. As regional economic analyses performed by Southeast Conference have repeatedly shown quite clearly, Central Tongass communities are now in an economically stable position due to the growth, stability, and lack of controversy inherent in our seafood and visitor industries, both of which rely on ecologically intact rainforest and the fish and wildlife services it provides local communities for subsistence and economic activity.

Both alternatives proposed in this Central Tongass DEIS not only threaten fish and wildlife across these ranger districts, they also create large-scale continuous clearcuts in key scenic viewsheds, such as the northeast coast of Kupreanof Island (Portage Bay TAA) which many small cruise ships, charters, and ferries travel past when sailing between Petersburg and other communities. Having been on the ferry with visitors passing large clearcuts on the southern Tongass, I have experienced first hand the confusion and disapproval of visitors who have travelled to Alaska because it represents opportunities for fishing, hunting, and recreation in "wild" or unharvested landscapes no longer available elsewhere in the US. Small cruise and charter visitors are a documented boost to local economies they visit, and as such help diversify Petersburg's economy. It is in our best interest as a community to remain competitive regionally in attracting this kind of small-scale tourism to

Petersburg by preserving our top notch scenic access to the Tongass rainforests. This DEIS does not adequately analyze impacts to that industry of cumulative old-growth clearcuts. I strongly oppose large-scale, contiguous old-growth clearcuts in scenic viewsheds.

Harm to small or ephemeral streams utilized by juvenile coho is a real concern with the many miles of additional logging roads or re-constructed logging roads proposed in this LLA. According to the Forest Service's own science, a majority of the coho we catch as Southeast Alaska commercial salmon trollers are Tongass-spawned coho and we are concerned that the cumulative impacts of the Central Tongass and POW LLAs plus new management under a potentially revised or repealed Roadless Rule holds the potential to severely impact wild coho stocks. These cumulative impacts are inadequately analyzed in the plan, which is a head scratcher since coho currently employ people in Petersburg and Wrangell whereas old-growth exports do not.

Additionally, there is mounting evidence that warming ocean temperatures, stream temperatures, regional droughts and other impacts of global climate change are already altering salmon habitat and life histories across Alaska including coho run timing on the Tongass. This Central Tongass LLA does not adequately analyze climate scenarios over the life of the plan. In plain terms, we may find after more years of prolonged drought that we simply cannot afford to jeopardize any coho habitat or the old-growth forest ecosystem that contributes to functional and resilient stream ecology across the Forest. The Central Tongass LLA does not adequately analyze climate impacts to fish and wildlife under its alternatives.

Though Forest Service staff mentioned during Petersburg's Sept. 4th public meeting that Sealaska Corporation models carbon storage values of Southeast Alaska's rainforest and rainforest soils for the global carbon market, the Forest Service has not used such techniques to estimate cumulative changes in carbon storage capacity under the LLA's alternatives. Again, this LLA must also be considered cumulatively with the POW LLA and all other current and potential Tongass management changes under review. Forest conservation is a major component of any realistic plan to reduce total degrees of atmospheric warming over the next century, an imperative that scientists agree threatens the human habitability of the planet. While the Tongass NF and the Central Tongass are just one landscape among many in a global sense, this high biomass rainforest is now understood to play an outsized role in carbon storage at a time in which all land management plans must put climate before all else if we are to prevent the most catastrophic climate scenarios. I wish this climate concern was hyperbole but the science is now very clear-it is highly irresponsible for the agency tasked with managing the United States' most important carbon storage forest to ignore its responsibility to prioritize this ecosystem service during what can only be understood as extremely harrowing times. This LLA should-but does not-review and utilize current literature and expertise on how to measure and optimize carbon storage in temperate rainforest and explain how different alternatives reflect any applicable climate-related statute or target.

Of concern to me is that the logging targets for this plan have been influenced more heavily by people outside of the Central Tongass than the people who live here. We have no large or even medium-sized lumber mill here. Our few micro mills stay busy with the relatively large amount of timber harvested for personal use available to all citizens of our communities. Economically speaking, these action alternatives literally do not serve our local interests in Petersburg. It would make so much more sense ecologically, socially, and economically to be spending these planning, roadbuilding, and project implementation dollars solely on restoring habitat destroyed or altered by existing roads and past harvest activities; studying and preparing for climate impacts to current economic and subsistence resources; as well as planning, implementing, and marketing new recreational infrastructure and opportunities. Old-growth clearcuts are only in the mix due to one mill on Prince of Wales and one export company that barges round logs to Asian markets. It is time to stop spending taxpayer money subsidizing these two businesses that comprise-even with supporting businesses-less than 2% of the regional economy, and instead utilize those federal resources to plan and prepare for sustainable industries. I understand that it is beyond the scope of this DEIS, but I fully support a "just transition" for permanent residents working at our last remaining mid-sized old-growth mill - this would be far cheaper than paying the economic and ecological costs associated with providing them one last "boom and bust."

Along with the Petersburg Borough Assembly, it's also of concern to me that the previous "integrated resource contracts" on Petersburg's ranger district met with some controversy after implementation did not meet all stated project goals and management accountability was found to be flawed. This unfortunately eroded public trust in these processes that has not been recovered. I know that I am not alone in being very concerned that the CTLLA will repeat the pattern of implementing the logging portion of these contracts but not restoration. The Forest Service has yet to communicate in good faith with the public or Petersburg's Borough Assembly regarding it's plan to conduct an audit of these sales.

I sincerely wish I had the capacity to do a full literature review and analysis on the subjects I've raised here and provide you with more references and citations to support my views. Unfortunately, I have to prioritize my small business this time of year. Thanks for considering my concerns anyway.

Sincerely,
Malena Marvin