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First name: Malena

Last name: Marvin

Organization:

Title:

Comments: I support Alternative 1-the No Action Alternative, and strongly oppose removing protections for roadless areas of the Tongass National Forest. Here's why:

1) Our federal Roadless hearing in Petersburg, Alaska was at capacity on a week night and all but one citizen participant spoke in favor of keeping the Roadless Rule on our forest. (The one person who spoke against the Roadless Rule acknowledged that road building has been responsible for loss of a robust Sitka Black-Tailed deer harvest on Mitkof Island!). As we learned at the public hearing:

* global climate was not considered in the review process for this plan,

* impacts to existing fisheries and tourism industries were not analyzed or reported

* the Roadless Rule has never been used to deny a development permit on the Tongass National Forest and cannot be shown to have impeded any energy or mineral development projects

* over 90% of 140,000 public comments opposed repealing Roadless protections

2) In an unprecedented act of unity, six tribal governments in Southeast Alaska have formally opposed removing Roadless protections from the Tongass National Forest, including our neighbors to the north in Kake:

<https://www.juneauempire.com/news/southeast-tribes-unite-to-oppose-lifting-roadless-rule/>

3) We build roads on the Tongass at enormous economic losses to American taxpayers. A new nonpartisan report from Taxpayers for Common Sense underscores this pattern, reporting that roadbuilding and timber sales have cost citizens \$600 million over two decades, or \$30 million annually.

<https://www.alaskapublic.org/2019/10/07/report-feds-lose-millions-in-tongass-timber-sales/>

4) Roadbuilding in the rainforest has been shown to severely alter sensitive watershed hydrology, increasing turbidity and/or entirely redirecting or destroying small or ephemeral streams utilized by species like coho salmon. With hundreds of miles of neglected roads currently threatening coho habitat on the Tongass, taxpayer money is best spent restoring hydrology and rainforest function!

As the owner of a direct market commercial fishing business in rural Southeast Alaska I strongly support management that explicitly protect and restores wild salmon habitat.

5) Several scientific developments this year along point to the need to utilize all available regulatory structures to vigorously address the global climate crisis. First, the science consensus has emerged that preserving large tree forests stores more carbon than clearcuts followed by plantations: <https://grist.org/article/leaving-trees-standing-might-be-more-important-than-planting-new-ones/>. Second, scientists have demonstrated that the Tongass plays an outsized role in global carbon storage: <https://www.seattletimes.com/opinion/alaskas-old-growth-forests-are-our-climate-change-insurance-policy/>. Third, The latest climate reports as of November 2019 underscore the urgency with which we must prioritize climate in all regulatory decisions: <https://www.nytimes.com/2019/11/26/climate/greenhouse-gas-emissions-carbon.html>

It is time to direct federal subsidies and management on the Tongass toward a "just transition" for impacted Southeast Alaskan workers that focuses on boots-on-the-ground restoration of imperiled watersheds and enhancement of recreational infrastructure.

Thank you so much,

Malena Marvin

Petersburg, Alaska

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