



December 16, 2019

USDA Forest Service Alaska Region
Alaska Roadless Rule
PO Box 21628
Juneau, AK 99802

Submitted electronically

PRESERVING WILD
SALMON HABITAT &
INDIGENOUS CULTURE

Eyak Preservation Council Comment:

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The Eyak Preservation Council (EPC) opposes the proposed exemption of the Tongass National Forest from the 2001 Roadless Rule, and also opposes the inclusion of any possible modifications to the Chugach National Forest Inventoried Roadless Area boundaries. We request that Secretary of Agriculture Sonny Perdue select Alternative 1 and not the preferred Alternative 6.

The correct decision is to protect the two largest national forests in our country. Preserve the health of our wild salmon by leaving the Roadless Rule fully intact. A loosening of the Roadless Rule would bring harm to the fisheries, economies, and valuable, living cultures throughout Southeastern and Southcentral Alaska. The proposed exemption from the Roadless Rule would negatively impact lands of Eyak, Tlingit, Haida, Tsimshian, Athabascan, Aleut, Alutiiq, and Chugach Peoples.

Advisory Council

Mary Ann Bishop, PhD

Nils Boisen

Karen Button

Susanna Colloredo

David Lynn Grimes

Chief Gary Harrison

Darcie Houck, Esq.

Robbin La Vine

Timothy Metz

Mariah Parker

Gabriel Scott, Esq.

Pamela Smith

Alan Trist

EPC is a public charity with 501(c)(3) status based in Cordova, Alaska. We offer educational and outreach programs that concentrate on: protection of our regional salmon way of life, Indigenous cultural preservation and the promotion of sustainable economies. We represent the communities and people of the Copper River, Prince William Sound and northern-central Gulf of Alaska. We have program participants from this region and from the nation at large.

As an organization whose mission includes a strong focus on Indigenous cultural preservation, EPC is in solidarity with the six federally-recognized tribes who have participated in the 2019 Roadless Rulemaking effort. All federally-recognized tribes must be treated as *sovereign nations* in federal processes. We demand the U.S. government live up to its pledge to engage in required government-to-government consultations with the sovereign Indigenous nations across Alaska. It is unacceptable that the sovereign entities are referred to as “cooperating agencies” within this Roadless Rulemaking process. The leaders of the six tribal governments that have weighed in all expressed concern about subsistence uses being compromised by the exemption of the Roadless Rule, and all stated their opposition to Alternative 6. Their firm objections to Alternative 6 must be acknowledged.



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As an agency, the Department of Agriculture cannot call the consultation process meaningful if the Secretary chooses to blatantly ignore the preferences of these sovereign nations' leaders. Tribal leaders should be able to collectively decide on how the lands are managed

The State of Alaska gave approximately ten percent of the federal USFS funds for facilitation of process to a timber industry group (Nina Lakhani, *The Guardian*, 'We depend on the Tongass', November 12, 2019). Lakhani, reporting from the *Guardian*, asserts that: The Alaska Forest Association was financially compensated for their participation in the rule making process. The six Tribal governments participating in the rulemaking process were given no financial aid, according to documents from KTOO Public Media. These included: the Angoon Cooperative Association, Central Council of Tlingit and Haida Indian Tribes, Hoonah Indian Association, Hydaburg Cooperative Association, organized village of Kake and organized village of Kasaan. All "have roots in the Tongass dating back thousands of years", yet received no compensation for their efforts, and their requests for extensions were denied (Nina Lakhani, *The Guardian*, 'We depend on the Tongass', November 12, 2019). The Eyak Preservation Council strongly disagrees with the blatant injustices and biased favoring of industry embedded in this process.

The Eyak Preservation Council agrees with the statement made by Richard Peterson, *President of the Central Council of Tlingit and Haida Indian Tribes of Alaska*: "Any elected official in Alaska who supports a full exemption, is disregarding their constituents, undermining the public process, and ignoring the sovereign Tribal governments – who's people have lived and depended on these lands and waters since time immemorial."

There are very convincing economic and ecological reasons to leave the 2001 Roadless Rule in place. Economically, the removal of any of the Tongass or Chugach National Forests from the Roadless Rule protections would be extremely unwise in light of our state's reliance on fisheries. Secretary Perdue must look at how much revenue Alaskan fisheries bring in compared to the logging industry. There are currently a mere 61 logging jobs in Southeast Alaska; Meanwhile, tourism and fishing make up 26% of jobs in the region (Austin Williams, Law and Policy Director at Trout Unlimited). These statistics demonstrate that we must protect our fish and forests in order to survive economically.

The goal of the State of Alaska's petition for exemption from the Roadless Rule was to revitalize logging. However, this pursuit is trivial and unsupported by the majority of Alaskans. Our state and federal agencies spend about \$30 million each year on road construction and planning for timber sales. However, timber sales only bring in about \$1.5 million per year (Williams). Trying to resurrect the logging industry is a losing financial proposition.



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At the latest Anchorage meeting on the Roadless Rule, a Juneau resident highlighted that, “approximately 90% of the 144,000 public comments submitted during the scoping period indicated preference for keeping the Roadless Rule in place.” Additionally, in the over decade-long collaborative planning for the latest Tongass Forest Plan, the top goal, agreed upon by the majority of stakeholders, was to phase out old-growth logging within 15 years.

However, the Secretary’s preferred Alternative 6 would work to achieve the opposite goal. Alternative 6 “would give the timber industry the opportunity to harvest some of the last remaining, really large (4’-10’ diameter), rare, old-growth trees in the Tongass”, in the words of a retired forester that worked in the Tongass for many years who was also at the Anchorage public meeting about the Roadless Rule on November 6th, 2019.

“An additional 166,000 acres of old-growth forest would be classified as harvestable... It takes about 300 years for those trees to develop old-growth characteristics”, which benefit the entire system, including salmon runs. This forester added that, “the scientific community has come to an agreement that old-growth forests are too valuable to be clear cut”, and opening the Tongass’ last remaining old-growth to clear-cutting “would have global climate impacts”.

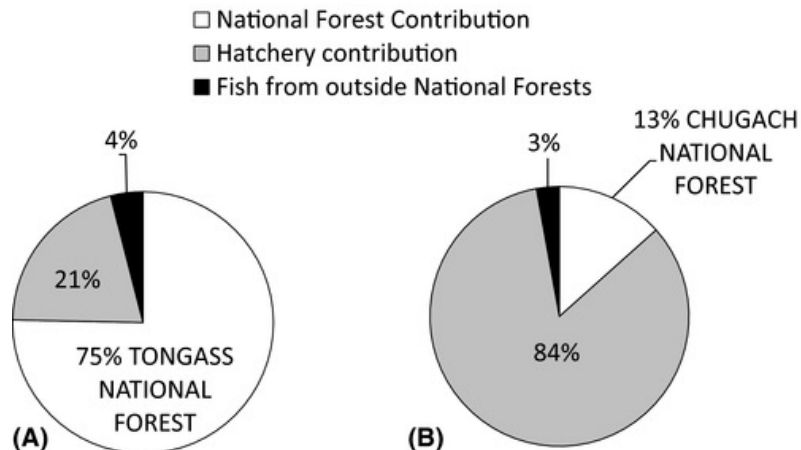
The inclusion of the Chugach National Forest in the proposed revision of the current Roadless Rule would amplify and expand the devastating harm to fisheries and the financial health of Southeastern and Southcentral Alaska. Not only does the Chugach National Forest host a magnificent Wilderness Study Area, it also safeguards waterways that support some of the largest fisheries in Alaska: the Copper River Delta and Prince William Sound.

We are extremely concerned about how additional logging development would threaten waterways and fish. According to Audubon Alaska, the Tongass includes 77 different watersheds that are home to staggering numbers of salmonids. The Situk watershed, immediately to the east of Yakutat, home to our Tlingit neighbors, is famous for its prolific salmonid populations (especially steelhead), and we do not condone risking these magnificent fish habitats or subsistence ways of life.

In *Quantifying the Monetary Value of Alaska National Forests to Commercial Pacific Salmon Fisheries*, Johnson et al. (2019) report that: “the Tongass and Chugach National Forests, with a land area less than 100,000 km², contributed an estimated 25% of the state's commercial Pacific salmon harvest... From 2007 to 2016 these national forests contributed an average of 48 million Pacific salmon annually to commercial fisheries, with a dockside value averaging \$88 million (inflation adjusted to the base year 2017).”



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Johnson et al. (2019) created these “pie charts showing the origin of Pacific salmon caught off shore from (A) the Tongass National Forest (Southeast Region) and (B) the Chugach National Forest (Prince William Sound subregion)”.

The scientific facts presented above outline the vital role that intact forests play in preserving healthy fisheries. As a nation, we have witnessed the devastating impacts of logging on the health of salmonid populations.

Scientists have traced the impacts of clear-cutting on downstream ecosystems. Lackey (2003) points out that logging activities can devastate freshwater spawning and rearing habitat for salmonids. We will never agree to risk the dynamic salmon forest ecosystems of Southeast and Southcentral Alaska, the majority of which remain pristine and impressively productive.

In summary, the Eyak Preservation Council is opposed to the proposed Roadless Rule changes for cultural, economic, and ecological reasons. We are demanding that the Tongass and the Chugach National Forests remain fully protected by the Roadless Rule.

Sincerely,

Carol Hoover / Executive Director

Eyak Preservation Council is a 501(c)3 #68-0424723

CC: DL, SS