



# Hoonah Indian Association

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## Hoonah Indian Association (HIA) Roadless Rule Statement of Position

Hoonah Indian Association acknowledges the Tongass National Forest must “support local and regional socioeconomic well-being including community vibrancy, Alaska Native culture, rural subsistence lifestyles, and economic opportunity” (DEIS Key Issue II). The Tribes participating as Cooperating Agencies know, that our lifestyle, culture, and foods are linked in dynamic ways to the Tongass and so are the economies that power our communities. Aside from our role as a Cooperating Agency on the Alaska Specific Roadless Rule, HIA is actively working with project partners from all disciplines to improve how we can maximize economic benefit from our local forest while preserving ecosystem services. Our engagement in the flagship partnership, the Hoonah Native Forest Partnership, links all those themes together in tangible, local results. Based on what we’ve learned through that 4-year partnership on Triple Bottom Line investment to promote economic, social, and environmental sustainability, we seek an Alaska Specific Roadless Rule that maximizes those values while reducing opportunity for long-term exploitation of critical old growth resources.

Per the guidelines of our U.S. Forest Service partners we have reviewed the Draft Environmental Impact Statement of the Rulemaking for Alaska Roadless (hereafter DEIS) and provided comments within the document to guide its continued formation. We have provided review of the alternatives with insight into how their methodology and assumptions may impact our community and Tribal members. The follow summary highlights key concerns we expect will be considered as this process moves forward.

### Methodology Concern:

1. Selection of roadless regions to be removed under the Alaska Specific Roadless Rule were not done considering their underlying watersheds. As local land users we identify with major watersheds to describe how we use the land and how logging will impact or be visible in regions we hunt, fish, and gather in. We have determined under Alternatives 6, 66 and 22 HUC 12 watersheds will have >50% and >75% of their area dropped from roadless protections respectively (Figure 1). In many cases these watersheds are contiguous adding to the impact of logging activity and would add to logging activities which have already occurred. We advocate for methods that do not create more than 2 contiguous, impacted watersheds 
2. Selection of roadless areas were not completed considered in a way that promotes underlying habitat - our watersheds are dynamic. This is related to Item 1. We appreciate the protections to riparian areas through the Tongass Land Management Plan, but there are many ecosystem and food web connections which will be strongly disturbed by contiguous removal of timber at all accessible and legally-harvest (e.g., correct slope) in impacted watersheds. One has only to look at the current logging practices that remove legal timber from the river nearly to the tops of the mountain. We believe

acceptance of this lends further evidence to the underlying methodology flaw identified in Item 1.

3. Removal of LUD II protections is not consistent throughout the methods. It is odd that LUD II protection is removed or maintained as Roadless through the Alternatives. In Alternative 3, the justification for removing it is to remove the redundancy of the protection provided by the LUD II designation and Roadless designation. However, this logic is disregarded in other alternatives. Violation of the logic suggests there are other motives for removing roadless protection from LUD II areas. For clarity and transparency, we advocate for consistently maintaining Roadless designation on LUD II areas throughout all alternatives to protect the important underlying habitats they were designated to protect. 
4. Removal of T77, Scenic watersheds, and Audubon watersheds disregards the need to manage the salmon habitat and wildlife biodiversity of the Tongass. These watersheds have been recognized by conservation organizations as the most critical areas in the Tongass for protecting biodiversity. Consideration of their removal is blatantly disregarding the best science available to guide conservation. We advocate for maintaining T77, Scenic Viewsheds, and Audubon Watersheds as roadless in all alternatives. 
5. Alternatives 4 and 6 do not create dynamic new alternatives. Timber Priority Areas replace roadless removed areas in Alternatives 4 and 6. Because roadless areas removed and established Timber Priority Areas overlap so strongly, there is little difference between the options created in alternatives 4 and 6. 

### **Assumption Concerns:**

1. Old growth logging demands cannot be met in regions currently allowable for road development. There is nowhere in the document that projects the amount of merchantable timber currently accessible in regions where roads may be built for timber extraction. We would like to see further language integrated into the DEIS from the State of Alaska justifying why a full-exemption is needed to sustain the industry. We would also like to see U.S. Forest Service model accessible timber against the needed 360 MMBF over the next decade to determine if demands can be met under current roadless conditions. 
2. Establishing “flexibility” is what is needed to create merchantable timber. This is related to Item 1. Establishing flexibility for timber sales is likely to establish logging in old growth stands with the highest environmental value because those stable, high volume stands also have high economic value old growth. 
3. Transition to young growth industries will progress on the schedule described in the Tongass Land Management Plan. The state’s request for a full repeal of the Roadless Rule is simply an expression of the hunger/perceived need for old growth from industry officials. Allowance of large areas of high-volume old growth in alternatives 4 and 6 is

not likely to facilitate the transition to young growth because it does not require the industry to be innovative or re-tool for second growth logging. We advocate for taking adopting a conservative Alternative because it creates the necessity to transition to young growth logging and makes it more likely for the Tongass Land Management Plan to succeed in its goals on schedule. 

Hoonah Indian Association acknowledges the need to support Southeast Alaska’s timber industry – we are not anti-logging. Locally, Icy Straits Lumber keeps our community members employed in meaningful work. However, we believe broadly opening the opportunity for timber extraction in Alternatives 4 and 6 greatly increase the likelihood of exploitation of valuable old growth areas. Our concerns are not readily met in the Alternatives outlined in the DEIS. We would like to see an Alternative which better compromises between removal of Roadless at a scale representative of local concerns. Adopting a watershed scale approach to removal of roadless areas would enable alternatives to be more specific and tailored to communities.

***Based on our concerns about methodology and assumptions outlined above, we advocate for Alternative 2 as it is the only one aligns with our concerns while providing new opportunities for timber on our existing road system.*** 

Analysis Needs:

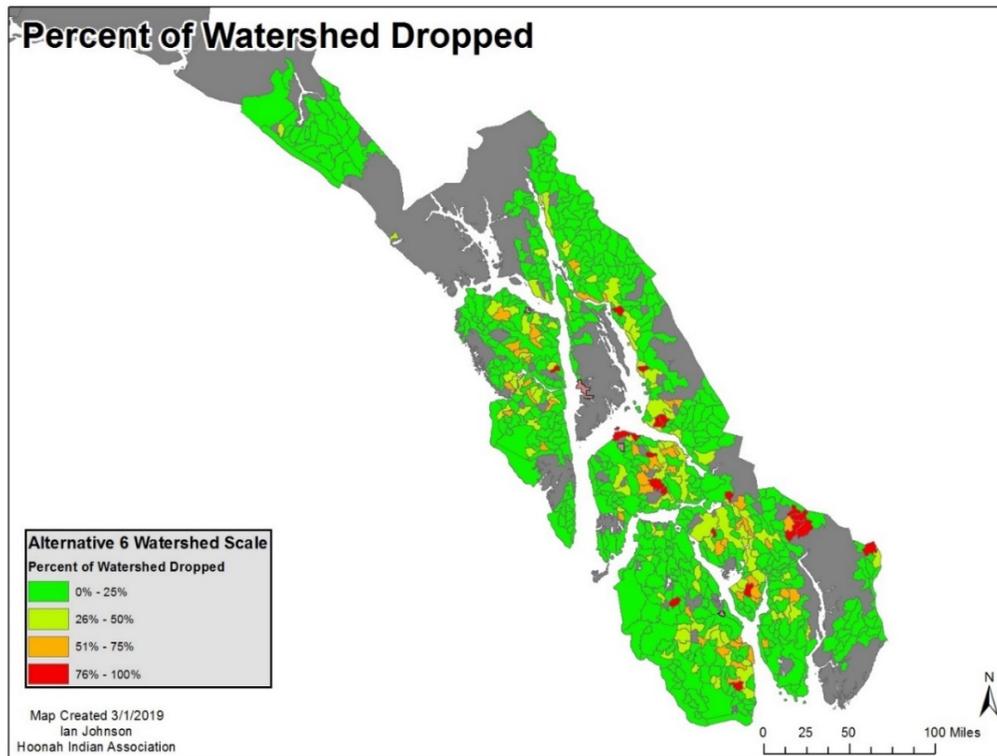


Figure 1 : Analysis of percent watershed dropped from roadless protections based on Alternative 6 of the DEIS.