Hydaburg Cooperative Association

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Alaska Roadless Rule
USDA Forest Service, Alaska Region
Ecosystem Planning and Budget Staff
P.O. Box 21628
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USDA - USFS Regional Office
ATTN: Regional Forester, Dave Schmid
P.O. Box 21628
Juneau, AK 99801-1807

Dear Mr. Schmid,

As a Cooperating Agency of the Alaska Roadless Rule NEPA process, the Hydaburg Cooperative Association (HCA) would like to make the comments within this letter on the preliminary draft Environmental Impact Statement. We understand that this NEPA process covers rule-making at a regional scale. While our comments may seem outside that scope, it is because we are thinking about the outcomes and/or consequences into the future, that have the potential to impact our Tribal members, as well as residents on Prince of Wales Island. We feel it is important to comment on the local scale, then on U.S. Forest Service District Scale, and finally a regional scale.

HCA is not entirely opposed to having an Alaska Roadless Rule. We recognize the value that additional access and opportunities may bring from having exclusions to the Roadless Rule. In reviewing maps that were produced in the preliminary draft EIS, we are comfortable starting

with Alternative 3, however we have a few localized concerns that Alternative 3 would mean on U.S. Forest Service lands within the traditional territory of Hydaburg. Because of these localized concerns, Alternative 2 offers the protections we would want to see within important watersheds around Hydaburg, which would in turn be more restrictive at a regional scale for allowing more access and opportunities to the region. Because of this, we do not believe the alternatives that were developed were appropriate because they did not look at localized impacts from the start.

Comments HCA would like to make on a localized scale include the following:

1. Watersheds that have been identified as the most important to Hydaburg (from traditional knowledge and numerous literature) include the following: Hetta Lake, Eek Lake, Nutkwa Inlet, Keete Inlet, Hunter's Bay, Manhattan Lake (on Dall Island) and the whole of Sukkwan Island. Alternative 2 would provide continued adequate protections for these watersheds. Alternative 3 would create a roadless exemption in developmental LUDs that are within all of the watersheds identified as important to Hydaburg. If the exemption were to occur in those watersheds, then the HCA would not support Alternative 3, and would want to take the more conservative approach by supporting Alternative 1 or 2.
2. HCA supported the Sealaska Corporation land selections bill, because important areas around Hydaburg would still remain under the Roadless Rule. Specifically, Sukkwan Island is within the viewshed and traditional territory of Hydaburg, so retaining that land into LUD II and the Roadless Rule was important. Under Alaska Roadless Rule Alternatives 3-6, the east side of Sukkwan Island would still be LUD II, however the west side would be within developmental LUDs. HCA would prefer that Sukkwan Island as a whole remain protected under the 2001 Roadless Rule because it has important cultural sites, fishing sites, and hunting and trapping areas.
3. Hetta Lake and Eek Lake are the two most important sockeye salmon systems to residents of Hydaburg, as well as Tribal family members across Prince of Wales and throughout the Region and into Washington. Hetta Lake is largely within Sealaska landholding and the community has continually worked to assure watershed protections remain in place. U.S. Forest Service lands are on the back side of the watershed, within >35% slopes, and any roads built through that area would increase the potential for landslides within the watershed, and to important lakeshore sockeye salmon spawning habitat. This area is not within LUD II, the Tongass 77, or the TNC/Audubon priority watersheds, and thus the only protections from development it receives is the 2001 Roadless Rule. HCA would only support Alternative 1 or 2 in this area. Eek Lake is LUD II immediately surrounding the watershed at lower elevations, but is within a developmental LUD in the higher elevations of the watershed. This palustrine dominated environment would be sensitive to developmental changes, and is currently only protected under the 2001 Roadless Rule, so again Alternative 1 or 2 would be the only alternatives HCA would support for Eek Lake.
4. The preliminary draft EIS does not cover the appropriate scale of analysis around individual communities. Around Hydaburg, a lot of the land ownership is ANSCA based lands which

have already been timber harvested. Additional timber harvest would reflect great cumulative effects than what has been written into the EIS on a regional scale. Further, the State of Alaska Community Use Area is not an appropriate boundary for determining impacts in and around Hydaburg, as their traditional territory goes beyone what has been identified within the Community Use Area.

Comments HCA would like to make on a Craig/Thorne Bay Ranger District scale include the following:

1. HCA works closely with other federally recognized Tribes on Prince of Wales Island across a variety of land-based issues. HCA would support any localize concerns that the Organized Village of Kasaan shares as a cooperating agency to this NEPA process, as well as any comments that Klawock Cooperative Association and Craig Community Association offer throughout the NEPA public commenting process.
2. HCA would like to assure that the NEPA analysis considers a more in depth evaluation of cultural and sacred sites on the Craig/Thorne Bay Ranger District, and how the different alternatives may impacts these areas. HCA would not support creating road access in areas of known sacred sites and/or culturally modified trees. Further, HCA would support alternatives that provided more conservation for yellow cedar, given the threats to this culturally important tree species and the potential cumulative effect the species faces with climate change.
3. While there may be no impact or connection, HCA is interested in knowing whether or not an Alaska Roadless Rule would impact or influence the Tribal Transportation Programs on Prince of Wales Island. Many U.S. Forest Service Roads were divided up and included in the road inventories for the four federally recognized Tribes on Prince of Wales Island. There is nothing in the analysis that covers this question. Further, the U.S. Forest Service meets regularly with the four Tribes to work on road maintenance, including culvert removals and/replacements. If additional roads are constructed, how will that be subsequently integrated with current Tribal Transportation Programs?

HCA would like to make the following comment on the Tongass National Forest scale:

1. The alternatives were developed on a region wide scale, and therefore in the analyses there are no significant differences between alternatives for a particular resource. HCA believes this is a fundamentally wrong way to approach the rule-making process for an Alaska Roadless Rule. In order to understand how an Alaska Roadless Rule will apply on the ground in the future, the process either needs alternatives developed on a smaller scale, or the analyses need to be made at a smaller scale, otherwise there are no real differences between alternatives. Our recommendation is to keep the alternatives, and then rework the analyses to evaluate the alternatives on a U.S. Forest Service Ranger District scale. We believe there are significant differences between alternatives, and that some Ranger Districts will more

impacts than others depending on where development LUDs and suitable old growth and young growth overlap.

Given the short two week turn around for comments on the preliminary draft EIS, and the time it has taken to get caught up on the process as a cooperating agency, the HCA would like to note that the comments herein are not all inclusive of the concerns HCA has or may have on the Alaska Roadless Rule NEPA process. We appreciate the opportunity to put forth some broad based concerns and look forward to our continued work with the team in moving through this process.

Sincerely,

Anthony Christianson

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