



United States Department of Agriculture

Office of the Secretary  
Washington, D.C. 20250

SEP 26 2019

Ms. Linda Behnken  
Executive Director  
Alaska Longline Fishermen's Association  
Post Office Box 1229  
Sitka, Alaska 99835

Dear Ms. Behnken:

Thank you for your letter of May 14, 2019, to Forest Service Chief Victoria Christiansen and me, regarding support for continued application of the 2001 National Roadless Rule to the Tongass National Forest in Alaska and requesting an extension to the upcoming public comment period. I apologize for the delayed response.

In response to a petition from the State of Alaska, I instructed the U.S. Department of Agriculture's Forest Service to initiate a rulemaking process and engage the public in revision of this regulation to address roadless area management concerns on the Tongass National Forest. The Alaska roadless rulemaking will examine the 2001 National Roadless Rule's application in Alaska to address economic development or other needs and conserve roadless areas for future generations.

We continue to expect that publication of the Draft Environmental Impact Statement this fall with a 60-day public comment period will meet the spirit and letter of applicable regulations governing public engagement. The Forest Service will again host community meetings across Alaska and in Washington, D.C. to provide information and answer questions. Written comments will be accepted by mail, email, and through online portals.

I am committed to meeting economic, social, and natural resource needs for Alaskans and all Americans. Throughout its work on the Alaska Roadless Rule, the Forest Service will uphold its mission to sustain the health, diversity and productivity of our Nation's forests and grasslands to meet the needs of future and present generations.

Thank you for your interest in the management of the Tongass National Forest. I appreciate your participation in this process.

Sincerely,

A handwritten signature in blue ink that reads "Sonny Perdue". The signature is fluid and cursive.

Sonny Perdue  
Secretary



# Alaska Longline FISHERMEN'S ASSOCIATION

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May 14, 2019

The Honorable Sonny Perdue  
Secretary, U.S. Department of Agriculture  
1400 Independence Ave.,  
SW Washington, DC 20250

Ms. Vicki Christiansen  
Chief, U.S. Forest Service  
1400 Independence Ave.,  
SW Washington, DC 20250

Dear Secretary Perdue and Chief Christiansen:

The Alaska Longline Fishermen's Association (ALFA) is a southeast Alaska-based commercial fishing organization that represents and advocates for commercial fishing vessel owners, deckhands and business members from numerous states and nearly every community in southeast Alaska who participate in, or otherwise support and benefit from the commercial fishing economy. Our members participate in all southeast Alaska commercial salmon fisheries – seine, gillnet and troll. ALFA's members and dozens of other southeast Alaska commercial fishermen submitted individual letters during the scoping comment period opposing any exemption the Roadless Rule. Indeed, the Forest Service's February 2019 summary of written public comments recognizes widespread concern about exemptions to the Roadless Rule because of its importance to the fishing industry. Inventoried roadless areas provide essential and intact spawning, rearing and migratory habitat for salmon – southeast Alaska's most valuable crop.

I am writing to express concern about the Forest Service's proposed public comment period for the Draft Environmental Impact Statement (DEIS) and to request an extended comment period. The Forest Service plans to release the DEIS in July 2019 and provide a 60-day comment period that runs concurrently with the fishing season. This timeline precludes southeast Alaskans and particularly commercial fishermen from participating in the process because the deadline would pass long before the end of the fishing season. The Forest Service should provide for a 120-day comment period for this action and delay the release of the DEIS to allow for meaningful opportunities for southeast Alaska fishermen and fishery dependent communities to participate in the process.

The requested comment period extension and delayed release is within the agency's authority and would further the purposes of the National Environmental Policy Act by providing a full and fair opportunity for public involvement. A primary purpose of NEPA is to insure that public stakeholders have an opportunity to review environmental information before an agency

completes its decision making process.<sup>1</sup> Federal agencies “shall, to the fullest extent possible ... [e]ncourage and facilitate public involvement in decisions which affect the human environment.”<sup>2</sup> The proposed timeline for the DEIS fails to meet these goals and standards.

Further, NEPA directs agencies to set flexible time limits based on multiple factors, including the scale of the action, potential for environmental harm, number of persons affected, and degree of controversy.<sup>3</sup> The scale of this action alone – affecting hundreds of thousands of acres of unroaded anadromous fish habitat – warrants a lengthy comment period. The potential environmental impacts of Roadless Rule exemption alternatives on fisheries also weigh in favor of an extended comment period. The 2000 Roadless Area Conservation FEIS identified numerous risks to aquatic habitat associated with timber road construction, including increased sediment, degraded water quality, habitat fragmentation, and high temperature regimes.<sup>4</sup> Salmon populations have diminished throughout the species’ range because of high levels of development in freshwater habitat throughout the west Pacific coast.<sup>5</sup> There are numerous scientific studies linking those declines in salmon productivity to logging road density and large-scale clearcutting.<sup>6</sup>

Southeast Alaska’s ecosystems have historically supported the most productive and highly valued commercial, sport, and subsistence salmon fisheries in the world and the largest remaining viable salmon fishery by volume on the Pacific Coast.<sup>7</sup> It is critical to maintain the remaining inventoried roadless anadromous salmon habitat in order to provide stability to the regional economy. Recent declines in salmon fishery outputs have resulted in serious risks to the economic viability of commercial fishermen throughout southeast Alaska. Any development that threatens the recovery of these fish – or worse, further diminishes the population – risks long-term adverse impacts on southeast Alaska fisheries.

According a 2018 report prepared by the Alaska Sustainable Fisheries Trust, recent harvests of all five salmon species in southeast Alaska have since fallen below historical averages, ranging from thirty to fifty million fish.<sup>8</sup> For all salmon species, the 2018 harvest was extremely low at 21.2 million fish. Harvest data show a notable decline in pink salmon harvests over the past decade, particularly during even year cycles.<sup>9</sup> The last two cycles have yielded alarmingly low harvests. The 2018 7.3 million fish harvest was the lowest since 1976 and 10 million fewer fish than caught in 2016 – a federal fishery disaster. Management measures designed to ensure pink salmon escapements have caused numerous closures of large fishing areas and large parts of historical fishing seasons.

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<sup>1</sup> 40 C.F.R. § 1500.1(b).

<sup>2</sup> 40 C.F.R. § 1500.2(d).

<sup>3</sup> 40 C.F.R. § 1501.8(b)(1).

<sup>4</sup> U.S. Forest Service. 2000. Roadless Area Conservation Final Environmental Impact Statement at 3-163.

<sup>5</sup> Bryant, M.D. 2008. Global climate change and potential effects on Pacific salmonids in freshwater ecosystems of southeast Alaska. Available at: [https://www.srs.fs.fed.us/pubs/ja/ja\\_bryant005.pdf](https://www.srs.fs.fed.us/pubs/ja/ja_bryant005.pdf).

<sup>6</sup> <http://www.thealaskatrust.org/seabank-annual-report-web>

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

The most productive fish habitat in southern southeast Alaska overlaps with industrial logging areas that have suffered habitat loss at a much greater rate than other portions of southeast Alaska. Remaining inventoried roadless in southern southeast Alaska comprise the most important salmon habitat in the region. Most regional salmon production occurs in just over a quarter of its watersheds identified by the Alaska Department of Fish and Game as Primary Salmon Producers - - 243 of 934 watersheds produce 60 percent of the pink salmon and 72 percent of cohos.<sup>10</sup>

Roughly a third of these Primary Salmon Producer watersheds are on Prince of Wales Island. Prince of Wales Island is the largest island in southeast Alaska, the 3<sup>rd</sup> largest island in the U.S., and the most productive island ecosystem in southeast Alaska for pink, coho and sockeye salmon, providing over a thousand miles of pink salmon streams and 1,904 stream miles of coho habitat on North Prince of Wales Island. The most staggering recent decline in pink salmon harvests was in Alaska Department of Fish and Game fishery regulatory district 2 – populations that spawn on in north central Prince of Wales Island watersheds that once formed the most productive pink salmon ecosystem in southeast Alaska. Further loss of roadless habitat on this island will concentrate commercial fisheries into historically less productive areas.

The productivity of marine habitat is variable and cyclical, increasing the importance of freshwater habitat and the buffering function of forests in order to maintain salmon populations during times of unfavorable ocean conditions. Warming trends in Alaska are likely to stress salmon stocks and disrupt migration patterns, decrease summer stream flows and altering temperature regimes. High levels of habitat degradation may coincide with periods of low marine productivity, what scientists call “double jeopardy” for fish facing poor conditions simultaneously in the marine and freshwater environment. Inventoried roadless areas – all of them – are the most important buffer for southeast Alaska’s fishery resources.

Additionally, an extended comment period is appropriate because of the number of affected individuals and businesses. The majority of the over 140,000 comments during the scoping period supported maintaining the Roadless Rule intact in southeast Alaska. Many individual commenters cited Roadless Rule protections for watershed and identified inventoried roadless areas as vital to the fishing industry. The salmon resource and commercial fishing are critical contributors to southeast Alaska’s socio-economic well-being. As explained in the Alaska Sustainable Fisheries Trust’s 2018 Sea Bank Annual Report, Southeast Alaska’s natural capital yields over 300 million pounds of seafood a year: over 8,000 harvesting and processing jobs; between \$380 million and \$500 million in earnings and an estimated \$700 million total economic impact on the region.

There are roughly 2,700 commercial fishing permit holders and 2,400 crew members living in southeast Alaska communities.<sup>11</sup> There are nearly 1,000 salmon troll permit holders active each year, making the troll fishery the second largest fleet in the state, second only to Bristol Bay. Alaska

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<sup>10</sup> Flanders, L.S. ed. 1998. Tongass fish and wildlife resource assessment 1998. Alaska Dept. of Fish and Game, Tech. Bulletin No. 98-4. Juneau, AK.

<sup>11</sup> <http://www.ufafish.org/wp-content/uploads/2018/09/Commercial-fishing-facts-ALL-IN-ONE-2016-v.7.0-REDUX.pdf>

residents comprise well over 80% of active permit holders.<sup>12</sup> Salmon is the most abundant and valuable seafood species for fishermen in these communities and supports 1 in 10 jobs in the region.<sup>13</sup> Seine, gillnet and troll harvests are the largest component of a regional fishery economy that supports over 4,500 processing jobs which generate over \$50 million in wages.<sup>14</sup> Earnings generated by the salmon economy support every business in southeast Alaska communities as well as a significant employment in the transportation, marine, academic and government sectors.<sup>15</sup>

Six of the top fishing ports in the entire country are within southeast Alaska, including top 20 ports Sitka and Ketchikan:

Port	Million pounds	National Rank	Landed Value	National Rank
Sitka	91.3	16	\$75,400,000	10
Ketchikan	77.0	18	\$46,400,000	41
Petersburg	64.8	19	\$51,700,000	26
Juneau	18.2	40	\$28,100,000	40
Wrangell	5.0	84	\$10,300,000	84
Yakutat	3.5	100	\$7,500,000	99

In sum, I would like to note that the U.S. Army Corps of Engineers recently extended the time period for the proposed Pebble Mine DEIS to 120 days due in large part to the scale of the action and potential consequences for a large commercial fishery. Roadless Rule exemption alternatives would affect an even larger area and larger salmon fishery. The Forest Service’s proposed timeline for the Alaska Roadless Rule prevents regional stakeholders from an opportunity to comment on a massive change to the distribution anadromous salmon habitat for fisheries. An extended comment period is necessary in order to fulfill NEPA’s guarantee for meaningful public participation in environmental decision making.



Linda Behnken

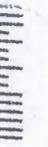
<sup>12</sup> <https://www.cfec.state.ak.us/pstatus/14052017.htm> (see Row S15B).

<sup>13</sup> *Id.*

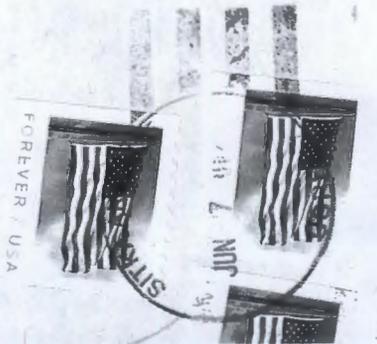
<sup>14</sup> <http://www.ufafish.org/wp-content/uploads/2018/09/Commercial-fishing-facts-ALL-IN-ONE-2016-v.7.0-REDUX.pdf>

<sup>15</sup> *Id.*

**Alaska Longline**  
FISHERMEN'S ASSOCIATION



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