

**Attachment A**  
**Letters from Agencies, Elected Officials, and**  
**Tribal Governments**  
**(continued)**

TONGASS NATIONAL FOREST  
2007 DRAFT ENVIRONMENTAL IMPACT STATEMENT  
AND  
TONGASS LAND AND RESOURCE MANAGEMENT PLAN AMENDMENT  
COMMENTS SUBMITTED BY ALASKA ENERGY AUTHORITY

1. INTRODUCTION

A Ninth Circuit Court ruling in 2005 and the January 2005 "5 Year Plan Review" set the stage for the amendment to the 1997 Tongass National Forest Land and Resource Management Plan. The Draft Environmental Impact Statement (DEIS) responds to the 2005 Court decision<sup>1</sup> and adjustments recommended during the recent 5-Year Review of the Forest Plan. A companion document, Proposed Land and Resource Management Plan represents the complete Forest Plan including all proposed amendments. Land and Resource Management Plans are required by the National Forest Management Act (NFMA) of 1976.

The Alaska Energy Authority (AEA) is pleased to provide comments on the DEIS and Proposed Tongass Land and Resource Management Plan (Tongass Land Management Plan or TLMP) dated January 2007.

The AEA, created by in 1976 by the Alaska Legislature, is a public corporation of the state of Alaska with a separate and independent legal existence. The agency is responsible for the administration of various state power projects and programs.

AEA Mission: Reduce the cost of energy in Alaska.

*"AEA projects and programs support its mission by 1) providing for the operation and maintenance of existing Authority-owned projects with maximum utility control, 2) assisting in the development of safe, reliable, and efficient energy systems throughout Alaska, which are sustainable and environmentally sound, 3) reducing the cost of electricity for residential customers and community facilities in rural Alaska, and 4) responding quickly and effectively to electrical emergencies."* (Emphasis added)

AEA Interest in the DEIS and Tongass Land Management Plan

The 16.8-million acre Tongass National Forest is the largest forest in the National Forest System (NFS) and remains for the most part wild and undeveloped. Approximately 71,000 people live in 32 communities and other areas located on islands or on the mainland coast. Developed areas cover about 1.50 million acres, or about 9% of the Forest. Only 8 of the 32 communities have populations greater than 1,000 persons. The economies of SE Alaskan communities rely on the Tongass National Forest to provide natural resources to support local sustainable economies: fishing, timber harvesting, recreation, tourism, mining, and subsistence activities.

<sup>1</sup> Ninth Circuit Court's decision in *Natural Resources Defense Council vs. U.S. Forest Service* (421 F.3d 797, August 5, 2005)

Most of the communities in Southeast (SE) Alaska are dependent on isolated sources of electricity; only Haines and Skagway, Petersburg and Wrangell, and several communities on Prince of Wales Island enjoy electric transmission interconnections.

Most existing and proposed transmission lines in SE Alaska are and/or would be located on lands within the Tongass National Forest, thereby requiring federal approval to site, construct, and operate proposed facilities. Exceptions include line segments located in the Metlakatla Indian Community on Annette Island, a federal reservation, and certain lands that have been conveyed to the state of Alaska and Native Alaska Corporations.

Since July 2006 AEA is participating actively with communities and electric utilities in SE Alaska through the AK-BC Intertie Steering Committee, Work Group, and Technical Group (AK-BC Intertie Committee/Groups) to conduct investigations and develop information in support of the proposed southern SE Alaska Intertie Plan, including the export line to British Columbia. An overarching goal of the interconnected electric transmission system is to provide least cost alternatives to diesel-generated electricity and to allow communities to remain economically sustainable, resulting in jobs for Alaskans.

In November 2006 AEA contracted with Hatch Acres Corporation to evaluate engineering, economic and political factors for development of a transmission interconnection from SE Alaska to British Columbia (AK-BC Intertie).

Several meetings were held in Ketchikan, Anchorage, and Juneau with the AK-BC Intertie Work Committee/Groups for the purpose of discussing potential future scenarios for an interconnected system within southern SE Alaska and the viability of the proposed AK-BC Intertie. Consultations have been ongoing with the Forest Service during development of the proposed system and AEA expresses its appreciation for the information provided by Forest Service staff throughout preparation of reports.

On April 6, 2007, AEA issued the Draft Final Report of the Alaska-British Columbia (AK-BC) Feasibility Study prepared by Hatch Acres Corporation under contract to AEA (2007 AK-BC Intertie Draft Final Report). AEA expects to issue the final report in June 2007.

The purpose of the AK-BC Intertie Project is twofold:

- To facilitate the development of the Southeast Alaska Electrical Intertie System<sup>2</sup> to interconnect communities, encourage development of new renewable electricity generating facilities, and through interconnections reduce the current level of diesel generation and reduce emissions that affect air quality and contribute to climate change. Providing access to low-cost renewable electric power to currently isolated communities solely reliant on diesel generated power will reduce emissions and allow communities to remain economically sustainable.
- To facilitate development of the AK-BC Intertie and encourage new renewable electricity generation facilities for energy export. The proposed interconnection

<sup>2</sup> The concept of the Southeast Alaska Electrical Intertie System is set forth in Report #97-01 prepared by Acres International Corporation for the Southeast Conference. This Report is incorporated by reference in these comments on the DEIS and Proposed Land and Resource Management Plan.

H-A53

with British Columbia will provide enhanced reliability to the Southeast Alaska Electrical Intertie System and provide additional revenue to SE Alaska through sales of Alaskan-generated power.

Currently several communities are served with clean renewable energy from existing hydro projects. In addition to encouraging new projects, the completion of an interconnected electric transmission system within SE Alaska would encourage upgrades to existing hydro facilities.

Energy export could lead to the development of a number of new renewable<sup>3</sup> electricity generating facilities in Southeast Alaska meeting domestic power needs and providing a surplus for export.

AEA requests that transmission corridors identified in the ongoing AK-BC Intertie Feasibility Study and corridors identified in an earlier comprehensive evaluation of an interconnected system for SE Alaska, the Southeast Alaska Electrical Intertie System Plan, Report #97-01, prepared by Acres International Corporation for the Southeast Conference dated January 1998 (1998 SE Alaska Intertie System Plan), be included on maps included in the DEIS and the Tongass Land Management Plan.

AEA requests the Forest Service to incorporate by reference the 2007 AK-BC Intertie Draft Final Report and a companion report, 1998 SE Alaska Intertie Plan. These reports are available on the AEA website [www.akenergyauthority.org/AlcanProjectPage](http://www.akenergyauthority.org/AlcanProjectPage).

AEA has reviewed the DEIS and Tongass Land Management Plan and understands that the Proposed Action alternative (Alternative 6) and related management prescriptions appear to allow implementation of the proposed electric transmission interconnections as included in the 2007 AK-BC Intertie Draft Final Report and the 1998 SE Alaska Intertie Plan. The following sections of AEA's comments provide detailed information regarding AEA's interests in assuring that these essential electric connections among communities in SE Alaska are considered in the DEIS and the Tongass Land Management Plan.

AEA has reviewed the map included in Alternative 6 Draft EIS and notes that two proposed segments are not currently identified: a line from Coffman Cove to the Four Dam Pool Power Agency (FDPPA) transmission line between the Tye Lake Project and Wrangell/Petersburg. These line segments are shown on [Figure 1 Additional Transmission Line Segments](#) is provided in Section 6 of these comments.

<sup>3</sup> Renewable electricity generating facilities includes hydro, tidal energy, geothermal, and wind.

## 2. STATE OF ALASKA EXPLANATORY STATEMENT

### 2.1 Importance of Utility System Corridors

Electricity is the universal energy form. Virtually every home, institution, office, business, and industry in the nation use electricity and all are directly affected by its price and availability. Utility rates and services affect the quality of life for residents, influence economic development in communities within the study area, and shape future opportunities in all sectors of the economy. Significant disparities in the cost of power for SE Alaska communities exist today.

Most electric systems in SE Alaska are community-based and serve isolated load centers. With the exception of the below-listed existing transmission lines, there are no interconnections to import or export power among the communities and electric utilities.

- Haines to Skagway - transmits hydropower generated near Skagway – Alaska Power & Telephone (AP&T)
- Tye to Petersburg and Wrangell - Four Dam Pool Power Agency (FDPPA) line delivers power from the Tye Lake Hydroelectric Plant
- Line linking several communities on Prince of Wales Island (POW) to the Black Bear Lake and South Forks Hydroelectric projects – AP&T

Lacking transmission interconnections to other electric systems, each utility must plan independently to provide full power requirements to meet customer needs. This results in many communities reliance on higher cost diesel-generated power and related emissions adversely affecting ambient air quality and contributing to global warming in SE Alaska. As noted above, with few exceptions, most existing and proposed new transmission lines are/would be constructed on lands within the Tongass National Forest.

AEA notes that the Forest Service includes "the social and economic well-being of the communities of Southeast Alaska" as one of the public issues considered in the 2003 Supplemental EIS. AEA does not see this concern brought forward as one of "The Three Focus Issues" in the 2007 DEIS. However, AEA notes that the social and economic well being in SE Alaska is woven into some of the discussion in the DEIS.

AEA notes that Land Use Designations (LUDs) specify ways of managing areas and resources within the forest. LUD's are assigned, or allocated, to specific areas of land and given areas have one LUD assigned. Transportation and Utility System LUDs are defined as "overlay LUDs and can apply to a given piece of ground when and if...transportation/utility systems are to be developed on that piece of ground." With certain exceptions, transportation and utility systems are allowed throughout the Tongass as directed by Title XI of the Alaska National Interest Lands Conservation Act of 1980 (ANILCA).

AEA notes that the Draft Proposed Tongass Forest Plan at Section 4 Standards & Guidelines does not include a section on Utility Systems. See specific comments and recommendations at sections 4 and 5 of these comments.

The following proposed transmission segments would fall within the definition of Transportation and Utility System LUDs. Many of the line segments currently under consideration are included in the list of Power Transmission Lines in the DEIS (page 3-233). The following list presents the complete list of line segments under consideration. These line segments are also depicted on the Maps at Section 6 within these comments. Proposed Transmission Segments within SE Alaska

Proposed connections in process at this date include:

- Juneau to Hoonah (the Juneau to Greens Creek portion is completed) - Kwaan Electric Transmission Intertie Cooperative, Inc. (KWETICO)
- Swan-Tyee Intertie (STI) that would interconnect Petersburg/Wrangell with Ketchikan and serve Ketchikan with current excess available energy at the Tyee Lake Hydroelectric Plant. – FDPPA
- Thayer Creek to Angoon - Kootzooowoo Inc., a Native village cooperative, proposed line from a new hydro project

Future proposed transmission segments and connections include:

- Juneau to Skagway
- Lake Dorothy to Juneau (AEL&P)
- Otter Creek to Skagway (AP&T)
- Hoonah to Tenakee Springs
- Tenakee Springs to Angoon
- Angoon to Sitka
- Takatz Lake to Kake
- Kake-Petersburg Transmission Intertie (KPTI)
- Sunrise Lake to Wrangell
- Metlakatla to Ketchikan – Metlakatla Power & Light Prince of Wales (POW) Island – segment to connect Coffman Cove and Naukati to southern POW communities. (not included in the list on page 3-223)
- Prince of Wales Island to FDPPA line near Wrangell – AP&T (not included in the list on page 3-233. This is an alternative to the line between Thorne Bay and Ketchikan included on the list)
- Thomas Bay to FDPPA line near Petersburg (not included in the list on page 3-233)

#### Proposed International Interconnection

- AK-BC Intertie

### **2.2 Benefits to the State and to Southeast Alaska**

SE Alaska decision-makers have an opportunity to engage in joint planning to develop an interconnected electric transmission system within SE Alaska and the potential to expand that concept to include an interconnection with BC. AEA requests that the Forest Service include the identified transmission segments in the DEIS and Tongass Land Management Plan (see Map – Figure 1 Additional Transmission Line Segments in Section 6 of these comments)

Implementation of joint planning and system operation are proposed in the AK-BC Intertie Draft Final Report and the 1998 Southeast Alaska Electric Intertie System Plan and will facilitate open access to regional system facilities at just and reasonable non-discriminatory rates. An interconnected electric transmission system will facilitate joint planning and shared use of existing and proposed new renewable electric generation projects.

Significant disparities in cost of power in SE exist today, in part related to availability of low-cost hydropower. Many isolated load centers are currently served by diesel generation.

SE Alaska communities have experienced slow population growth for decades. The economy is in transition from a commodity resource-based economy to one where the economy is mixed, with increasing development in service-oriented businesses including government services, recreation and tourism.

Completion of the STI and development of proposed transmission lines to interconnect submarkets, and a future interconnection with BC, will encourage new sustainable economic development in currently isolated load centers and improve quality of life for residents currently encumbered with high cost energy from diesel generation.

### **2.3 Benefits to the Tongass National Forest**

Completion of an interconnected electric transmission system will reduce reliance on diesel generation in SE Alaska and facilitate switching from fuel oil to electric heat for residential, government, and commercial customers. Reduced diesel generation and fuel oil use in SE Alaska will result in reduced adverse environmental effects that occur with transport, storage, and end-use of diesel and fuel oil.

AEA presents in the following section detailed information regarding avoided emissions that could result when individual load centers and systems are interconnected in southern SE Alaska, including completion of the Swan-Tyee Intertie and connections between Kake and Petersburg and Metlakatla and Ketchikan. Similar results can be anticipated in other areas throughout SE Alaska as transmission line segments are completed.

The United States Environmental Protection Agency (EPA) is mainly concerned with emissions which are or could be harmful to people. EPA calls this set of principal air pollutants, criteria pollutants. The criteria pollutants are carbon monoxide (CO), lead (Pb), nitrogen dioxide(NO<sub>2</sub>), ozone (O<sub>3</sub>), particulate matter (PM), and sulfur dioxide (SO<sub>2</sub>).

Four of the criteria pollutants related to diesel generation and household oil-fired furnaces with/without interconnections were examined in this analysis – CO<sub>2</sub>, SOx, CO, and NOx.

With completion of the STI in 2010, conversion of a portion of oil fired furnace load could reduce CO<sub>2</sub> and SOx emissions by 795,155 and 5,074 tons or some 47.7% and 45.5% respectively over the period from 2007 to 2046 or 485,996 and 3,150 tons or some

53.3% and 51.5% respectively over the period from 2007 to 2031 when compared with the isolated case without conversion. Over the period from 2007 to 2046, emissions of CO and NOx would be increased by 348 and 1673 tons or about 9.2% and 10.2% respectively due to the corresponding high emission factors of diesel engines.

Detailed information is presented in the following section in response to the DEIS.

### 3. SPECIFIC COMMENTS - DEIS

#### **3.1 Climate and Air (pages 3-11 – 3-15)**

One of the goals common to all alternatives stated in the DEIS is: "Air. Maintain the current air resource condition to protect the Forest's ecosystems from on- and off- Forest air emission sources." (Page 2-7 DEIS)

Section 3 of the DEIS includes a description of the affected environment and related environmental effects. AEA notes several references to diesel power plants as a source of air pollution. The proposed interconnected electric transmission system presented in the recently issued AK-BC Intertie Feasibility Study Draft Final Report would result in decreased diesel generation in southern SE Alaska and would facilitate switching from fuel oil to electric heat in several communities.

AEA requested Hatch Energy to perform an analysis of avoided emissions that could result when individual load centers and systems are interconnected in southern SE Alaska. The following section "Estimated Avoided Emissions" of AEA's comments presents the results of that analysis as it would relate to the goal stated in Chapter 2 of the Draft Proposed Tongass Forest Plan: "Maintain the current air resource condition to protect the Forest's ecosystems from on- and off- Forest air emission sources." And the related objective: "Attain national and state-ambient air quality standards forest-wide."

#### ESTIMATED AVOIDED EMISSIONS

Two load growth scenarios were investigated:

- Include conversion of a portion of heating supplied by oil fired heating furnaces to loads supplied by electrical heaters (case with conversion)
- Consider that heating would continue to be supplied by oil fired heating furnaces (case without or no conversion).

In the case with conversion of oil fired heating furnaces, the annual expected displaced oil consumption of these furnaces was estimated and the expected amount is discussed in this section.

For each of the two load growth scenarios, the generation for three system development cases was determined in order to calculate the avoided emissions. These cases are:

- |                               |   |
|-------------------------------|---|
| 1) Isolated --                | Swan-Tyee Intertie is not implemented and both Kate and Metlakatla remain isolated;   |
| 2) Isolated With STI --       | Swan-Tyee Intertie is commissioned in 2010 but both Kate and Metlakatla remain isolated;  |
| 3) Interconnected With STI -- | Swan-Tyee Intertie is commissioned in 2010, Kate is interconnected with Petersburg and Metlakatla is interconnected with Ketchikan. |

## Emission Factors

Four emission pollutants - CO<sub>2</sub>, SO<sub>x</sub>, CO and NO<sub>x</sub> - were examined in this study. The emission factors used were obtained from AP 42, Volume I, Fifth Edition published by the Environmental Protection Agency (EPA) of the USA in 1995. These factors are summarized as follows:

Pollutant	Diesel Engine	Furnace
<b>Emission Factors in Pounds Per Horsepower-Hour (lb/hp-hr)</b>		
CO <sub>2</sub>	1.16	
SO <sub>x</sub>	0.00809	
CO	0.0055	
NO <sub>x</sub>	0.024	
<b>Emission Factors in Pounds Per Thousand Gallons of Fuel (lb/1000-gal)</b>		
CO <sub>2</sub>	22,548	22,300
SO <sub>x</sub>	157	144
CO	107	5
NO <sub>x</sub>	467	18

It is important to note that the emission factors in lb/hp-hr for diesel engines shown in the table above are the average values for large diesel engines (greater than 600 hp). The factors in lb/1000-gal for the diesel engines are calculated based on the values in lb/hp-hr, heat rate of 7,000 Btu/hp-hr, diesel heating value of 19,300 Btu/lb and diesel density 7.05 lb/gal. It is also assumed that the diesel used contains 1% of sulfur.

It can be seen from these emission factors that for the same amount of liquid fuel consumed by the diesel engines and furnaces, the two types of facilities emit similar amounts of CO<sub>2</sub> and SO<sub>x</sub> but diesel engines emit much more CO and NO<sub>x</sub> than furnaces. CO and NO<sub>x</sub> emissions from diesel engines are about 21 times and 26 times of those from furnaces.

## 2 Electricity Required for Conversion of Oil Fired Heating Furnaces

In this analysis, five load centers were considered - Ketchikan, Metlakatla, Wrangell, Petersburg and Kake. The estimated additional annual electrical energy required to supply the loads that would be converted from oil fired heating furnaces assumed as well as the displaced oil consumption in the case with conversion are summarized as follows:

Year	Additional Electricity Required (MWh)	Displaced Oil Consumption (US Gallon)
2007	2,759	108,375
2008	5,433	213,377
2009	8,016	314,846
2010	11,728	453,163
2011	18,962	707,095
2012	28,600	1,039,909
2013	30,889	1,129,792
2014	39,194	1,417,705
2015	41,449	1,506,298
2016	43,641	1,592,398
2017	45,765	1,675,796
2018	47,841	1,757,324
2019	49,874	1,837,193
2020	51,891	1,916,396
2021	53,860	1,993,728
2022	55,781	2,069,190
2023	57,660	2,142,990
2024	59,492	2,214,920
2025	61,286	2,285,395
2026	63,058	2,354,991
2027	64,793	2,423,133
2028	66,496	2,490,028
2029	68,168	2,555,676
2030	69,802	2,619,869
2031	71,425	2,683,600
<b>Total</b>	<b>1,117,863</b>	<b>41,503,183</b>

With conversion of each MWh of furnace load to electrical load, about 37 gallons of heating oil can be displaced. Based on a heat rate 7,000 Btu/hp-hr, a heating value of 19,300 Btu/lb and a density of 7.05 lb/gal as mentioned earlier, diesel engines would use about 69 gallons of diesel to generate one MWh. This implies that diesel engines have lower efficiency than heating furnaces. If the additional load for heating was produced by diesel engines, there would be more oil consumption and more pollution than in the case of supply from heating furnaces. It is important to note that most of the additional or displaced heating furnace load is expected to be produced by unused hydro generation.

H-A57

### 3 Estimated Avoided Emissions

The following tables present total and avoided emissions over the periods from 2007 to 2041 and from 2007 to 2031. Tables showing detailed information from which these summary tables were developed is attached at the end of this section of the comments.

**Summary Table - Total Emissions**

Theme	Case	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)
<b>2007-2046</b>					
No-Conversion	Isolated	1,667,754	11,160	3,790	16,381
	Isolated-STI	1,485,993	9,892	2,928	12,620
	IC-STI	1,383,714	9,179	2,443	10,504
Conversion	Isolated	1,424,535	9,935	6,754	29,473
	Isolated-STI	956,242	6,669	4,534	19,784
	IC-STI	872,599	6,086	4,137	18,054
<b>2007-2031</b>					
No-Conversion	Isolated	912,198	6,123	2,235	9,672
	Isolated-STI	829,041	5,543	1,840	7,952
	IC-STI	770,639	5,135	1,564	6,743
Conversion	Isolated	754,157	5,260	3,576	15,603
	Isolated-STI	471,672	3,290	2,236	9,759
	IC-STI	426,202	2,972	2,021	8,818

It can be seen from the above table that in the interconnected case with the Swan-Tyee interconnection commissioned in 2010, conversion of a portion of oil fired furnace load could reduce CO2 and SOx emissions by 795,155 and 5,074 tons or some 47.7% and 45.5% respectively over the period from 2007 to 2046 or 485,996 and 3,150 tons or some 53.3% and 51.5% respectively over the period from 2007 to 2031 when compared with the isolated case without conversion. Over the period from 2007 to 2046, emissions of CO and NOx would be increased by 348 and 1673 tons or about 9.2% and 10.2% respectively and this is due to the corresponding high emission factors of diesel engines.

**Summary Table - Avoided Emissions**

Theme	Case	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)
<b>2007-2046</b>					
No-Conversion	Isolated	--	--	--	--
	Isolated-STI	181,762	1,268	862	3,761
	IC-STI	284,040	1,981	1,347	5,877
Conversion	Isolated	243,219	1,225	-2,965	-13,093
	Isolated-STI	711,513	4,491	-744	-3,404
	IC-STI	795,155	5,074	-348	-1,673
<b>2007-2031</b>					
No-Conversion	Isolated	--	--	--	--
	Isolated-STI	83,156	580	394	1,720
	IC-STI	141,559	987	671	2,929
Conversion	Isolated	158,041	863	-1,341	-5,931
	Isolated-STI	440,525	2,833	-2	-87
	IC-STI	485,996	3,150	214	854

The following Tables 1 and 2 present detailed information regarding the estimated annual emissions in short tons (2000lb/short ton) for each of the two load growths studied.

H-A58

Year	Isolated Case					Isolated Case With STI					Interconnected Case With STI					
	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)	NO <sub>x</sub> (ton)	Year	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)	NO <sub>x</sub> (ton)	Year	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)
2007	28,036	195	127	556	556	2007	28,036	195	127	556	556	2007	28,036	195	127	556
2008	31,890	221	140	612	612	2008	31,890	221	140	612	612	2008	31,890	221	140	612
2009	34,217	237	146	638	638	2009	34,217	237	146	638	638	2009	34,217	237	146	638
2010	26,217	180	101	442	442	2010	13,592	92	42	181	181	2010	13,592	92	42	181
2011	18,520	125	52	226	226	2011	17,134	115	46	198	198	2011	15,153	102	36	157
2012	22,891	154	56	243	243	2012	22,221	149	53	229	229	2012	20,228	135	44	188
2013	24,458	164	59	256	256	2013	23,907	160	56	244	244	2013	21,715	145	46	199
2014	28,625	191	64	278	278	2014	28,900	193	66	284	284	2014	23,336	155	39	169
2015	30,262	202	68	292	292	2015	27,377	182	54	232	232	2015	24,900	165	42	181
2016	31,898	213	71	307	307	2016	28,969	193	57	246	246	2016	26,431	175	45	194
2017	33,551	224	75	323	323	2017	30,532	203	60	260	260	2017	27,930	185	48	206
2018	35,193	235	78	339	339	2018	32,075	214	64	274	274	2018	29,548	196	52	222
2019	36,829	246	82	355	355	2019	33,606	224	67	288	288	2019	31,402	208	56	242
2020	38,466	257	86	371	371	2020	35,377	236	71	307	307	2020	33,416	222	62	267
2021	40,087	268	90	387	387	2021	37,279	249	76	329	329	2021	35,414	235	67	291
2022	40,288	269	87	375	375	2022	37,777	252	75	323	323	2022	37,396	249	73	315
2023	41,910	280	91	392	392	2023	39,664	264	80	346	346	2023	36,394	234	60	257
2024	43,693	292	96	413	413	2024	41,528	277	85	368	368	2024	37,314	247	65	281
2025	42,179	281	85	368	368	2025	43,375	289	91	391	391	2025	39,230	260	71	305
2026	43,638	291	88	381	381	2026	36,848	243	56	240	240	2026	33,952	223	42	180
2027	45,128	301	92	397	397	2027	38,154	252	59	252	252	2027	35,250	232	45	192
2028	46,731	312	96	415	415	2028	39,488	261	62	265	265	2028	36,568	241	48	205
2029	48,418	323	101	435	435	2029	40,965	271	65	280	280	2029	38,014	250	52	220
2030	48,704	325	99	427	427	2030	42,365	280	69	296	296	2030	39,443	260	55	235
2031	50,370	336	104	447	447	2031	43,797	290	72	311	311	2031	40,872	270	59	251
<b>Total</b>	<b>912,198</b>	<b>6,123</b>	<b>2,235</b>	<b>9,672</b>	<b>9,672</b>	<b>Total</b>	<b>829,041</b>	<b>5,543</b>	<b>1,840</b>	<b>7,952</b>	<b>7,952</b>	<b>Total</b>	<b>770,639</b>	<b>5,135</b>	<b>1,564</b>	<b>6,743</b>

AEA Comments  
Tongass National Forest  
2007 DEIS and Tongass Land and Resource Management Plan Amendment  
April 30, 2007

Table 2: Estimated Emissions for Cases With Conversion of Oil Fired Heating Furnaces

Year	Isolated Case					Isolated Case With STI					Interconnected Case With STI					
	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)	NO <sub>x</sub> (ton)	Year	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)	NO <sub>x</sub> (ton)	Year	CO2 (ton)	SOx (ton)	CO (ton)	NOx (ton)
2007	27,962	195	133	579	579	2007	27,962	195	133	579	579	2007	27,962	195	133	579
2008	31,980	223	152	662	662	2008	31,980	223	152	662	662	2008	31,980	223	152	662
2009	34,618	241	164	716	716	2009	34,618	241	164	716	716	2009	34,618	241	164	716
2010	25,086	175	119	519	519	2010	7,369	51	35	152	152	2010	7,369	51	35	152
2011	14,202	99	67	294	294	2011	8,514	59	40	176	176	2011	6,616	46	31	137
2012	18,331	128	87	379	379	2012	10,939	76	52	226	226	2012	9,168	64	43	190
2013	19,657	137	93	407	407	2013	12,161	85	58	252	252	2013	9,885	69	47	205
2014	23,868	166	113	494	494	2014	9,154	64	43	189	189	2014	6,120	43	29	127
2015	22,343	156	106	462	462	2015	10,102	70	48	209	209	2015	6,867	48	33	142
2016	23,893	167	113	494	494	2016	11,068	77	52	229	229	2016	8,080	56	38	167
2017	25,625	179	121	530	530	2017	12,432	87	59	257	257	2017	9,653	67	46	200
2018	27,362	191	130	566	566	2018	12,006	84	57	248	248	2018	9,026	63	43	187
2019	29,106	203	138	602	602	2019	13,646	95	65	282	282	2019	10,590	74	50	219
2020	29,481	206	140	610	610	2020	15,383	107	73	318	318	2020	12,175	85	58	252
2021	31,215	218	148	646	646	2021	17,112	119	81	354	354	2021	13,789	96	65	285
2022	29,803	208	141	617	617	2022	15,702	110	74	325	325	2022	15,595	109	74	323
2023	31,323	218	149	648	648	2023	17,233	120	82	357	357	2023	17,571	123	83	364
2024	32,858	229	156	680	680	2024	18,999	133	90	393	393	2024	19,542	136	93	404
2025	34,413	240	163	712	712	2025	20,824	145	99	431	431	2025	21,505	150	102	445
2026	35,980	251	171	744	744	2026	22,660	158	108	469	469	2026	19,778	138	94	409
2027	37,540	262	178	777	777	2027	24,551	171	116	508	508	2027	21,701	151	103	449
2028	39,127	273	186	810	810	2028	26,418	184	125	547	547	2028	23,648	165	112	489
2029	40,906	285	194	846	846	2029	28,310	197	134	586	586	2029	25,615	179	121	530
2030	42,787	298	203	885	885	2030	30,207	211	143	625	625	2030	27,588	192	131	571
2031	44,692	312	212	925	925	2031	32,305	225	153	668	668	2031	29,760	208	141	616
<b>Total</b>	<b>754,157</b>	<b>5,260</b>	<b>3,576</b>	<b>15,603</b>	<b>15,603</b>	<b>Total</b>	<b>471,672</b>	<b>3,290</b>	<b>2,236</b>	<b>9,759</b>	<b>9,759</b>	<b>Total</b>	<b>426,202</b>	<b>2,972</b>	<b>2,021</b>	<b>8,818</b>

AEA Comments  
Tongass National Forest  
2007 DEIS and Tongass Land and Resource Management Plan Amendment  
April 30, 2007

### 3.2 Human Uses and Land Management (pages 3-219 – 3-403)

#### Transportation and Utilities

##### Power Transmission Lines

Page 3-233 – paragraph should include the following segments:

##### Proposed Transmission Segments within SE Alaska

Proposed connections in process at this date include:

- Juneau to Hoonah (the Juneau to Greens Creek portion is completed) - Kwaan Electric Transmission Intertie Cooperative, Inc. (KWETICO)
- Swan-Tyee Intertie (STI) that would interconnect Petersburg/Wrangell with Ketchikan and serve Ketchikan with current excess available energy at the Tyee Lake Hydroelectric Plant. – FDPPA
- Thayer Creek to Angoon - Kootzoowoo Inc., a Native village cooperative, proposed line from a new hydro project

Future proposed transmission segments and connections include:

- Juneau to Skagway
- Lake Dorothy to Juneau (AEL&P)
- Otter Creek to Skagway (AP&T)
- Hoonah to Tenakee Springs
- Tenakee Springs to Angoon
- Angoon to Sitka
- Takatz Lake to Kake
- Kake-Petersburg Transmission Intertie (KPTI)
- Sunrise Lake to Wrangell
- Metlakatla to Ketchikan – Metlakatla Power & Light (not included in the list on page 3-223)
- Prince of Wales (POW) Island – segment to connect Coffman Cove and Naukati to southern POW communities. (not included in the list on page 3-223)
- Prince of Wales Island to FDPPA line near Wrangell – AP&T (not included in the list on page 3-233. This is an alternative to the line between Thorne Bay and Ketchikan included on the list)
- Thomas Bay to FDPPA line near Petersburg (not included in the list on page 3-233)

##### Proposed International Interconnection

- AK-BC Intertie

#### Economic and Social Environment

##### Introduction (page 3-403)

Note that the Tongass National Forest is the primary land-owner in SE Alaska. DEIS states that "Appropriate management of the Tongass' natural resources, is, therefore, extremely important for local communities and the overall regional economy."

Adequate infrastructure is an essential element of a healthy economic and social environment. As noted earlier in these comments, electricity is an essential service and electric transmission infrastructure is the delivery system. The introduction section should recognize the importance of this element.

##### Cumulative Effects (page 3-470)

"Other reasonably foreseeable actions include transportation and utility developments." While paragraph includes "utility developments", text solely relates to roads. Section should include reference to electric transmission line segments identified above under "Power Transmission Lines."

4. SPECIFIC COMMENTS – Proposed Land and Resource Management Plan

Chapter 2 Goals and Objectives

Forest-wide Multiple-use Goals and Objectives (pages 2-2 through 2-5)

Resource	Goal Statement from Plan	Objective Statement from Plan	AEA Comments
Air	"Maintain the current air resource condition to protect the Forest's ecosystems from on- and off- Forest air emission sources."	"Attain national and state-ambient air quality standards forest-wide."	Implementation of the proposed SE Alaska Electrical Intertie System will reduce current levels of emissions associated with diesel-generation (transportation & delivery, storage, end-use) and potential for spill. Reduction of current level of heating oil and associated emissions and potential for spill will occur as conversion to electric heat becomes an option.
Local and Regional Economies	"Provide a diversity of opportunities for resource uses that contribute to the local and regional economies of Southeast Alaska."	"Work with local communities to identify rural community assistance opportunities and provide technical assistance in their implementation. Support a wide range of natural-resource employment opportunities within Southeast Alaska's communities."	Implementation of the proposed SE Alaska Electrical Intertie System will provide access to lower cost electricity from renewable electricity generating facilities to currently isolated communities solely dependent on diesel-generated electricity. Access to lower cost power will enhance the ability of communities to attain economic sustainability and increase employment opportunities in isolated rural communities.
Transportation	"Develop and manage roads and utility systems to support resource management activities; recognize the potential for future development of major Transportation and Utility Systems."	"Provide access for forest users. In support of forest resource management activities, design and construct up to an average of 61 miles of roads annually. Manage and maintain roads to protect water, soil, fish, and wildlife"	AEA notes that this section includes Utility Systems, however the Objectives solely relate to Transportation. AEA recommends a separate section "Utility Systems" be included in the Final TLMP Plan at page 2-5. See next section of this table.

		resources."	
Utility Systems (new resource category)	AEA recommended goal: "Develop and manage utility systems to support resource management activities; recognize the potential for future development of Utility Systems, including the proposed SE Alaska Electrical Intertie System."	AEA recommended objectives: "Provide access to the Forest for purposes of constructing and operating electric transmission lines and related facilities to reduce current levels of air emissions associated with diesel generation and provide communities with access to low-cost power to facilitate economically sustainable communities."	AEA recommendation for addition to current list of Resources and related Goals and Objectives. Page 2-5 Draft TLMP Plan.

**Management Prescriptions 3**

**Transportation and Utility System  
Land Use Designation TUS**

See page 3-144: AEA requests that the Table "Transportation and Utility Systems Land Use Designation add a row below Transportation to include "Utility Systems" and that the Forest-wide Standards & Guidelines in Chapter 4 be expanded to include "Utility Systems."

See page 3-148: AEA requests that the list of LUD Standards and Guidelines include reference to "Utility Systems." Currently the text refers to Utility Systems, however the title is restricted to "TRANSPORTATION Transportation Operations: TRAN1.

**Standards & Guidelines 4**

**LANDS  
Forest-wide Standards & Guidelines**

See page 4-32: VII. Right-of-Way Grants, D. States applicability of standards and guidelines to Transportation and Utility Systems. Note that powerlines may be installed to operate above 66kV, but in some instances are initially operated at 34.5kV. Some line segments (e.g. line from Metlakatla to Ketchikan) will be constructed at 34.5kV. These line segments play an important role in the overall plan to electrically interconnect SE Alaska and should be included within eligible facilities in the Transportation and Utility System (TUS) Land Designation (LUD).

See pages 4-110 through 4-117 TRANSPORTATION Forest-wide Standards and Guidelines. AEA notes that this section is referred to as the Forest-wide Standards and Guidelines for Transmission and Utility Systems. However, the current Draft Proposed Tongass Forest Plan does not include Standards and Guidelines applicable to Utility Systems.

## 5. RECOMMENDATIONS

This section of AEA's comments provides recommendations for the Final EIS and Final Proposed Tongass Forest Plan. These recommendations are discussed in the preceding sections of these comments and are compiled within this section 5 to facilitate Forest Service consideration and response in the Final EIS and Final Proposed Tongass Forest Plan. The above sections of these comments provide the background and basis for these recommendations.

### 5.1 DRAFT EIS

#### 1. Purpose and Need

Add the social and economic well-being of the communities of Southeast Alaska as a Key Issue in the Final EIS. (Page 1-6 The Three Focus Issues – Key Issues) Presently the social and economic well-being relates solely to timber management. AEA notes that the electric transmission infrastructure that will occupy National Forest lands is a critical element to future social and economic well-being in the region.

#### 3. Environment and Effects

##### Transportation and Utilities

##### Power Transmission Lines (Page 3-233)

##### Power Transmission Lines

Page 3-233 – paragraph should include the following segments:

##### Proposed Transmission Segments within SE Alaska

Proposed connections in process at this date include:

- Juneau to Hoonah (the Juneau to Greens Creek portion is completed) - Kwaan Electric Transmission Intertie Cooperative, Inc. (KWETICO)
- Swan-Tyee Intertie (STI) that would interconnect Petersburg/Wrangell with Ketchikan and serve Ketchikan with current excess available energy at the Tyee Lake Hydroelectric Plant. – FDPPA
- Thayer Creek to Angoon - Kootzoowoo Inc., a Native village cooperative, proposed line from a new hydro project

Future proposed transmission segments and connections include:

- Juneau to Skagway
- Lake Dorothy to Juneau (AEL&P)
- Otter Creek to Skagway (AP&T)
- Hoonah to Tenakee Springs
- Tenakee Springs to Angoon
- Angoon to Sitka
- Takatz Lake to Kake

- Kake-Petersburg Transmission Intertie (KPTI)
- Sunrise Lake to Wrangell
- Metlakatla to Ketchikan – Metlakatla Power & Light (not included in the list on page 3-223)
- Prince of Wales (POW) Island – segment to connect Coffman Cove and Naukati to southern POW communities. (not included in the list on page 3-223)
- Prince of Wales Island to FDPPA line near Wrangell – AP&T (not included in the list on page 3-233. This is an alternative to the line between Thorne Bay and Ketchikan included on the list)
- Thomas Bay to FDPPA line near Petersburg (not included in the list on page 3-233)

##### Proposed International Interconnection

- AK-BC Intertie

##### Economic and Social Environment

##### Introduction (page 3-403)

Note that the Tongass National Forest is the primary land-owner in SE Alaska. DEIS states that "Appropriate management of the Tongass' natural resources, is, therefore, extremely important for local communities and the overall regional economy."

Adequate infrastructure is an essential element of a healthy economic and social environment. As noted earlier in these comments, electricity is an essential service and electric transmission infrastructure is the delivery system. The introduction section should recognize the importance of this element.

##### Cumulative Effects (page 3-470)

"Other reasonably foreseeable actions include transportation and utility developments." While paragraph includes "utility developments", text solely relates to roads. Section should include reference to electric transmission line segments identified above under "Power Transmission Lines."

##### Alternative 6 Draft EIS Map

Add the following segments:

- Prince of Wales Island to FDPPA line near Wrangell – AP&T (not included in the list on page 3-233. This is an alternative to the line between Thorne Bay and Ketchikan included on the list)
- Thomas Bay to FDPPA line near Petersburg (not included in the list on page 3-233)

Map showing location of these segments is included in Section 6. Maps of these comments.

**5.2 Draft Proposed Tongass Forest Plan**

Chapter 2 Goals and Objectives

Table - Forest-wide Multiple-use Goals and Objectives ( pages 2-2 through 2-5)

Resource category "Transportation" includes reference to utility systems in the goal statement, however the objectives relate solely to roads.

AEA recommends that the table include a new resource category "Utility Systems":

Resource	Goal Statement from Plan	Objective Statement from Plan	AEA recommendation
Utility Systems (new resource category)	AEA recommended goal: "Develop and manage utility systems to support resource management activities; recognize the potential for future development of Utility Systems, including the proposed SE Alaska Electrical Intertie System."	AEA recommended objectives: "Provide access to the Forest for purposes of constructing and operating electric transmission lines and related facilities to reduce current levels of air emissions associated with diesel generation and provide communities with access to low-cost power to facilitate economically sustainable communities."	AEA recommendation for addition to current list of Resources and related Goals and Objectives. Page 2-5 Draft TLMP Plan.

**Management Prescriptions 3**

**Transportation and Utility System Land Use Designation TUS**

See page 3-144: AEA requests that the Table "Transportation and Utility Systems Land Use Designation add a row below Transportation to include "Utility Systems" and that the Forest-wide Standards & Guidelines in Chapter 4 be expanded to include "Utility Systems."

See page 3-148: AEA requests that the list of LUD Standards and Guidelines include reference to "Utility Systems." Currently the text refers to Utility Systems, however the title is restricted to "TRANSPORTATION Transportation Operations: TRAN1.

**Standards & Guidelines 4**

**LANDS**

**Forest-wide Standards & Guidelines**

See page 4-32: VII. Right-of-Way Grants, D. States applicability of standards and guidelines to Transportation and Utility Systems. Note that powerlines may be installed to operate above 66kV, but in some instances are initially operated at 34.5kV. Some line

segments (e.g. line from Metlakatla to Ketchikan) will be constructed at 34.5kV. These line segments play an important role in the overall plan to electrically interconnect SE Alaska and should be included within eligible facilities in the Transportation and Utility System (TUS) Land Designation (LUD).

See pages 4-110 through 4-117 TRANSPORTATION Forest-wide Standards and Guidelines. AEA notes that this section is referred to as the Forest-wide Standards and Guidelines for Transmission and Utility Systems. However, the current Draft Proposed Tongass Forest Plan does not include Standards and Guidelines applicable to Utility Systems. AEA recommends that an additional category UTILITY SYSTEMS be prepared and provided in the Final Proposed Tongass Forest Plan.

This new section could contain information relating to the coordination of federal agency approvals for electric transmission established in the August 8, 2006 "Memorandum of Understanding on Early Coordination of Federal Authorizations and Related Environmental Reviews Required in Order to Site Electric Transmission Facilities" (MOU)<sup>4</sup> signed by the departments of Energy (DOE), Agriculture (USDA – includes the Forest Service), Defense (DOD – includes the Corps of Engineers (COE)), Interior (DOI – includes the Fish and Wildlife Service (FWS)), Commerce (includes the National Marine Fisheries Service (NMFS)); and the Federal Energy Regulatory Commission (FERC), the Environmental Protection Agency (EPA), the Council on Environmental Quality (CEQ), and the Advisory Council of Historic Preservation with the commitment to work together to meet each Agency's obligations. The purpose of the MOU is to establish a framework for early cooperation and participation that will enhance coordination of all applicable land use authorizations, related environmental, cultural, and historic preservation reviews, and any other approvals that may be required under Federal law in order to site an electric transmission facility. Central to this MOU is compliance with NEPA and preparation of related environmental documents, including the EA or EIS.

<sup>4</sup> The MOU was developed in response to requirements of the Energy Policy Act of 2005 that amended the Federal Power Act; codified at USC 824p.

H-A63

6. MAPS

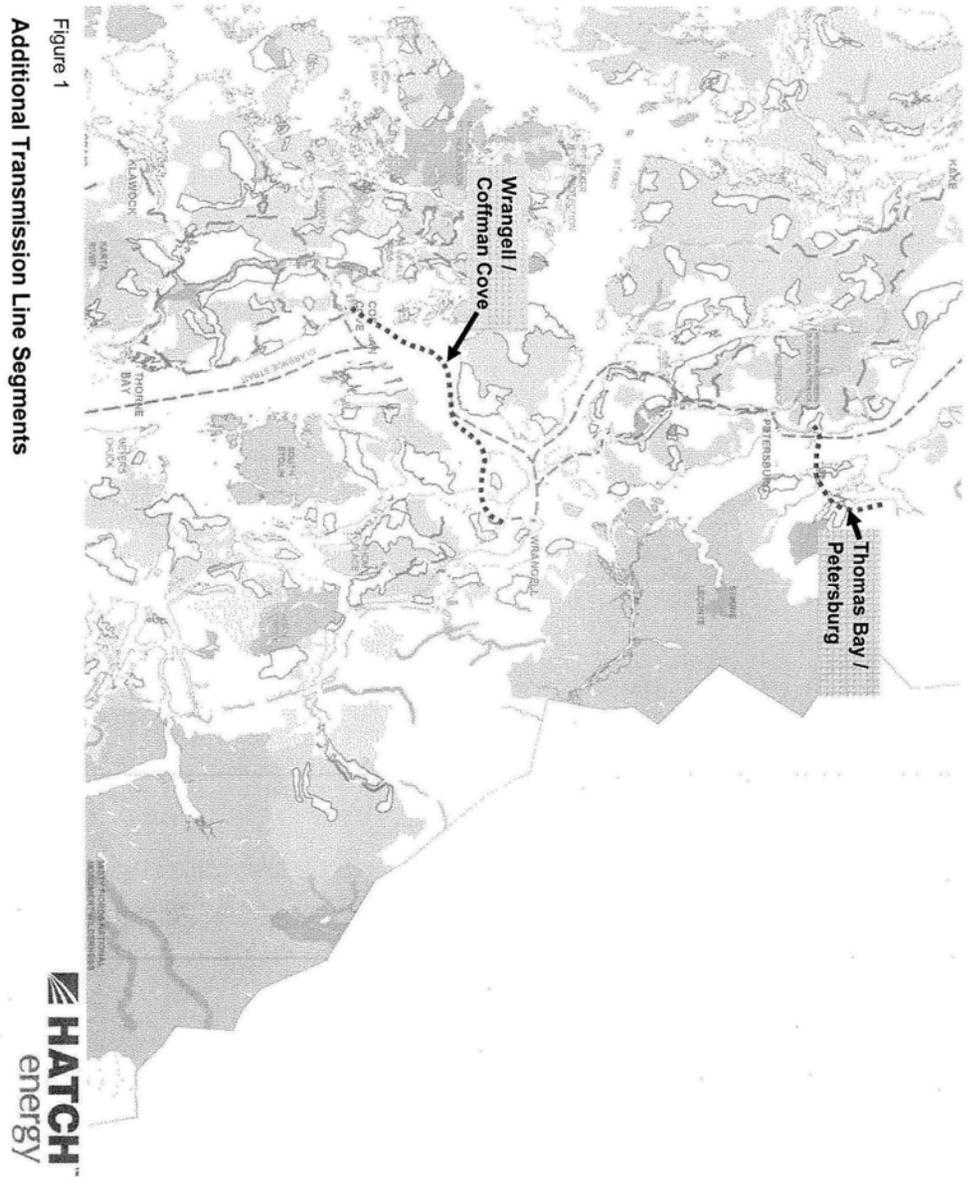


Figure 1  
Additional Transmission Line Segments



CENTRAL COUNCIL  
tlingit and haida indian tribes of alaska  
ANDREW P HOPE BUILDING  
320 West Willoughby Avenue • Suite 300  
Juneau, Alaska 99801-9983

997

April 27, 2007

Forrest Cole, Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901



Dear Mr. Cole,

On behalf of Central Council Tlingit & Haida Indian Tribes of Alaska (CCTHITA) and our 26,000 members worldwide, we are submitting the following comments on the Tongass Land Management Plan (TLMP) Amendment Draft Environmental Impact Statement (DEIS) 2007.

Our stewardship concerns are for our entire tribal membership but more specifically for those 13,500 living in direct proximity to the Tongass National Forest in Southeast Alaska. As part of the responsibility to our members, we are compelled to address the issues regarding the forest. The interests of tribal members and governments extend beyond mere use of forest resources. We have additional responsibilities as *stewards of the air, land, and sea* to ensure a balance is maintained in the use of natural resources.

After much deliberation on defining the balance between sustainable use and conservation of available resources we support, in principle, **Alternative 5** as proposed by the US Forest Service. Through our participation in groups (Tongass Futures Roundtable and Southeast Conference) working on the same forest related issues in the Tongass, we have come to the conclusion that prudent use as well as prudent conservation of forest resources is necessary even in economically challenging times. Short-term gain at the expense of long-term stability is careless choice.

It is for this reason that we support Alternative 5 with the inclusion of our concerns that any development of forest resources take into account: 1) Protection of Native Sacred Sites within the forest, 2) Protection of intact watersheds of importance to habitat, fisheries, and subsistence, 3) Promotion and funding of a forest and riparian restoration program, 4) Provision of sufficient forest resources to support a sustainable level of economic activity in forest related industries, 5) Slow and controlled transition from old growth to second growth in limited areas.

In addressing the conditional support of Alternative 5, the protection of Native Sacred Sites should be paramount in any decision about the development of Tongass resources.

Native Alaskan peoples have been in the forest for longer than recorded history. The preservation of sacred sites is essential. The disruption or destruction of any of these sites without explicit approval of proper tribal authorities is not acceptable.

Concern two in our support of Alternative 5 reflects the importance of the whole ecosystem to Native Alaskans. The very existence of many tribal members depends on the quality, quantity, and distribution of wildlife and fishery resources. Subsistence resources are of extreme importance to our culture and well being. Disruption, destruction, and/or contamination of these resources are of intense concern to us in any changes to the forest ecosystem. All proposed changes in areas, methods, and levels of resource development should reflect this concern.

Concern number three is a need for a substantive program put in place to promote, support, and fund a riparian and forest restoration program. Resource development in Tongass ecosystem over the past decades has had noticeable impact. Past and future development can be ameliorated through such a program. This program will be most successful with a dedicated funding source such as a federal trust fund. A program without a dedicated funding source is too unreliable.

Concern four addresses the actual use of Tongass Forest resources. Forest resources should be viewed in light of sustaining and preserving not stripping and abandoning. As stewards of the forest, we believe in the thoughtful use of its resources. The balancing of sustaining the forest and economic development is a tentative but essential one. A long term plan for value-added use of forest resources is much preferred to one on stripping and selling the resource at its lowest value point. In other words, use of forest resources should be vertically integrated on a local level in Southeast Alaska as to provide the largest positive economic impact for the resource being used. Federal policies dedicated toward these ends should be pursued. These policies allow for sufficient access to renewable forest resources to sustain local vertically integrated value added forest product industries. Access to non-renewable forest resources should be limited and closely controlled.

And finally, concern number five, transition from old growth to new growth is a natural cycle of life. To the best ability of the forest management team, this transition should take place in an orderly least disruptive process. Destruction of entire portions of the Tongass ecosystem as a method of harvesting should be considered a last resort not a preferred practice. Forest stewardship should be based on sustainable forestry practices and not extractive resource practices. The environmental and lost opportunity costs should be included in the overall economic feasibility evaluations of opening any new areas to resource development.

H-A65

1387



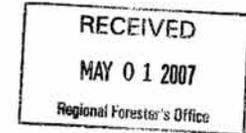
CENTRAL COUNCIL  
 tlingit and haida indian tribes of alaska  
 ANDREW P. HOPE BUILDING  
 320 West Willoughby Avenue • Suite 300  
 Juneau, Alaska 99801-1726

In conclusion, we understand that the review process for the TLMP is a long and sometimes contentious time for Southeast Alaska. At CCTHITA, we choose the path of sharing our concerns and support with you as your review process comes to another milestone. We felt it was more valuable to share with you our reasons based in our traditional values. If there is anything we can do to support your efforts as they address our concerns, please feel free to call on us.

Best regards,

William E. Martin  
 President

April 30, 2007



Mr. Denny Bschor  
 Alaska Regional Forester  
 US Forest Service  
 P.O. Box 21628  
 Juneau, AK 99802-1628

Dear Mr. Bschor,

Enclosed, please find a copy of the comments submitted by Central Council Tlingit & Haida Indian Tribes of Alaska as part of the Tongass Land Management Plan review.

The policy statement was developed as a cooperative effort of our Business & Economic Development and Native Lands & Resources Departments. Our efforts are in support of a policy of sustainable development of one of the most valuable cultural and economic assets in the United States. We believe ours is a sound and sensible approach to preservation and development of this resource for all citizens.

Thank you for your efforts on behalf of the residents of Alaska.

Best regards,

Andrei Chakine  
 Manager  
[achakine@ccthita.org](mailto:achakine@ccthita.org)  
 (907) 463-7121

Steve Wade  
 Economic Development Specialist  
[swade@ccthita.org](mailto:swade@ccthita.org)  
 (907) 463-7724

Enclosures: 1

ADOPTED this 27th day of April 2007, by the Executive Council of the Central Council of Tlingit and Haida Indian Tribes of Alaska, by a vote of 6 yeas, 0 nays, 0 abstentions and 0 absence(s).

**CERTIFY**

President William E. Martin

**ATTEST**

Tribal Secretary Dana Leask Ruaro

CC: Alaska Regional Forester, Danny Bschor  
 Alaska Governor, Sarah Palin  
 US Senator, Ted Stevens  
 US Senator, Lisa Murkowski  
 US Congressman, Don Young  
 USFS Chief, Gail Kimbell  
 USDA, Under-secretary Mark Rey

H-A66



CENTRAL COUNCIL  
 Tlingit and Haida Indian Tribes of Alaska  
 ANDREW P. HOPE BUILDING  
 320 West Willoughby Avenue • Suite 300  
 Juneau, Alaska 99801-9983

April 27, 20

Forrest Cole, Supervisor  
 Tongass National Forest  
 648 Mission Street  
 Ketchikan, AK 99901

Dear Mr. Cole,

On behalf of Central Council Tlingit & Haida Indian Tribes of Alaska (CCTHITA) our 26,000 members worldwide, we are submitting the following comments on the Tongass Land Management Plan (TLMP) Amendment Draft Environmental Impact Statement (DEIS) 2007.

Our stewardship concerns are for our entire tribal membership but more specifically for those 13,500 living in direct proximity to the Tongass National Forest in Southeast Alaska. As part of the responsibility to our members, we are compelled to address the issues regarding the forest. The interests of tribal members and governments extend beyond mere use of forest resources. We have additional responsibilities as *stewards of the air, land, and sea* to ensure a balance is maintained in the use of natural resources.

After much deliberation on defining the balance between sustainable use and conservation of available resources we support, in principle, **Alternative 5** as proposed by the US Forest Service. Through our participation in groups (Tongass Future Roundtable and Southeast Conference) working on the same forest related issues in the Tongass, we have come to the conclusion that prudent use as well as prudent conservation of forest resources is necessary even in economically challenging times. Short-term gain at the expense of long-term stability is a careless choice.

It is for this reason that we support Alternative 5 with the inclusion of our concerns that any development of forest resources take into account: 1) Protection of Native Sacred Sites within the forest, 2) Protection of intact watersheds of importance to habitat, fisheries, and subsistence, 3) Promotion and funding of a forest and riparian restoration program, 4) Provision of sufficient forest resources to support a sustainable level of economic activity in forest related industries, 5) Slow and controlled transition from old growth to second growth in limited areas.

In addressing the conditional support of Alternative 5, the protection of Native Sacred Sites should be paramount in any decision about the development of Tongass resources

Page 1 of 3

Native Alaskan peoples have been in the forest for longer than recorded history. The preservation of sacred sites is essential. The disruption or destruction of any of these sites without explicit approval of proper tribal authorities is not acceptable.

Concern two in our support of Alternative 5 reflects the importance of the whole ecosystem to Native Alaskans. The very existence of many tribal members depends on the quality, quantity, and distribution of wildlife and fishery resources. Subsistence resources are of extreme importance to our culture and well being. Disruption, destruction, and/or contamination of these resources are of intense concern to us in any changes to the forest ecosystem. All proposed changes in areas, methods, and levels of resource development should reflect this concern.

Concern number three is a need for a substantive program put in place to promote, support, and fund a riparian and forest restoration program. Resource development in the Tongass ecosystem over the past decades has had noticeable impact. Past and future development can be ameliorated through such a program. This program will be most successful with a dedicated funding source such as a federal trust fund. A program without a dedicated funding source is too unreliable.

Concern four addresses the actual use of Tongass Forest resources. Forest resources should be viewed in light of sustaining and preserving not stripping and abandoning. As stewards of the forest, we believe in the thoughtful use of its resources. The balancing of sustaining the forest and economic development is a tentative but essential one. A long term plan for value-added use of forest resources is much preferred to one on stripping and selling the resource at its lowest value point. In other words, use of forest resources should be vertically integrated on a local level in Southeast Alaska as to provide the largest positive economic impact for the resource being used. Federal policies dedicated toward these ends should be pursued. These policies allow for sufficient access to renewable forest resources to sustain local vertically integrated value added forest product industries. Access to non-renewable forest resources should be limited and closely controlled.

And finally, concern number five, transition from old growth to new growth is a natural cycle of life. To the best ability of the forest management team, this transition should take place in an orderly least disruptive process. Destruction of entire portions of the Tongass ecosystem as a method of harvesting should be considered a last resort not a preferred practice. Forest stewardship should be based on sustainable forestry practices and not extractive resource practices. The environmental and lost opportunity costs should be included in the overall economic feasibility evaluations of opening any new areas to resource development.

Page 2 of 3

H-A67

1389



### Douglas Indian Association Tribal Government

1107 West 8th St. #3 Juneau, Alaska 99801-1802  
Phone: (907) 364-2916 Fax: (907) 364-2917



In conclusion, we understand that the review process for the TLMP is a long and sometimes contentious time for Southeast Alaska. At CCTHITA, we choose the path of sharing our concerns and support with you as your review process comes to another milestone. We felt it was more valuable to share with you our reasons based in our traditional values. If there is anything we can do to support your efforts as they address our concerns, please feel free to call on us.

Best regards,

William E. Martin  
President

USDA FS Tongass NF  
Federal Building  
648 Mission Street  
Ketchikan, Alaska 99901

To Whom It May Concern,  
We would like to thank Peter Griffin, Juneau Ranger District for taking the time to meet with Douglas Indian Association staff members Scott Sloane and myself to discuss the 7 Alternatives of the Draft Tongass land and Resource Management Plan (Forest Plans) as they pertained to the Douglas Indian Association and its Tribal members Traditional Lands.

Douglas Indian Association is a federally recognized tribal government established under the authority of the Indian Reorganization Act (IRA) of 1934 and we have a government to government relationship with all federal agencies of the United States of America. As a federally recognized tribal government it is very important that we relay to you our concerns about the 7 Alternatives and their impacts to our people and their Traditional lands.

It is very important to understand that we are always strongly advocating for the protection of the fisheries and game and the land for both commercial and subsistence use and that we request that our comments be seriously considered when it comes to any impacts that will occur to these resources as your organization continues to manage land usage within the Tongass National Forest. We have concerns for impacts to fish habitat, wildlife habitat, subsistence, timber harvests near fish and wildlife habitat and the need to be able to sustain jobs while not harming the environment which we depend on daily to sustain ourselves and our way of life.

We recognize that when addressing impacts to the Tongass National Forest we are also addressing the Economic well-being of our Southeast Alaskan communities, us included and we do so responsibly and respectfully.

The TLUMP Amendment overview that was provided showed, when speaking of the Traditional lands of the Douglas Indian Association members, that the impacts that were going to occur under;

Alternatives 1 thru 3: Represent basically a status quo usage of the land and waters around Juneau, from the northern shores of Berners Bay south to Snettisham and the Admiralty Island National Monument lands eastern shores from Young Bay to Point Gardner.

ADOPTED this 27th day of April 2007, by the Executive Council of the Central Council of Tlingit and Haida Indian Tribes of Alaska, by a vote of 6 yeas, 0 nays, 0 abstentions and 0 absence(s).

**CERTIFY**

President William E. Martin

**ATTEST**

Tribal Secretary Dana Leask Ruaro

- CC: Alaska Regional Forester, Danny Bschor
- Alaska Governor, Sarah Palin
- US Senator, Ted Stevens
- US Senator, Lisa Murkowski
- US Congressman, Don Young
- USFS Chief, Gail Kimbell
- USDA, Under-secretary Mark Rey

H-A68



Alternative 4: We have a concern that there is a more "moderate" to "intense" approach to timber harvesting in the area north and south of the Taku River and along the southeastern shores of Stephens Passage toward Snettisham plus the southwestern shores of Douglas Island. We request as this process evolves that our government to government consultations occur and that we be kept informed as your organization develops these programs.

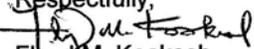
Alternative 5: The plan is that this is a No-Action alternative, representing a continuation of the current forest plan and would result in a mix of national forest uses and activities.

Alternative 6: Indications are that timber harvest is no longer shown on the southwestern shores of Douglas Island and that more "moderate" to "intense" timber harvest are to occur from The Taku River to Snettisham we request that our government to government consultation to occur and that we be kept informed as your organization develops these programs.

Alternative 7: Indications are that a "moderate" approach to timber harvest is to occur on the Southwestern shore of Douglas Island and that a "moderate" to "intense" approach to timber harvest will occur from the Take River to Snettisham and we request as this process evolves that our government to government consultation to occur and that we be kept informed as your organization develops these programs.

We also note that there are no telecommunication systems site plans listed for the Tongass National Forest, are there any proposed?

On behalf of Douglas Indian Association thank you for considering our comment on the TLUMP Amendment and we do look forward to your response.

Respectfully,  
  
Floyd M. Kookesh  
Tribal Administrator  
Douglas Indian Association

H-A69



**Hydaburg Cooperative Association**  
P.O. Box 349  
Hydaburg AK, 99922  
PH#907-285-3666  
FX#907-285-3541

4/25/07

Tongass National Forest  
Attn: Forest Plan Adjustment  
648 Mission Street  
Ketchikan, AK 99901

RE: Comments on the Tongass Land and Resource Management Plan Amendment Draft EIS

To Whom It May Concern:

The Hydaburg Cooperative Association (IRA) is a federally recognized tribe organized pursuant to the authority of Section 16 of the Act of Congress June 18, 1934 (48 Statute 984) as amended by act of Congress, May 1, 1936. Hydaburg Cooperative Association Tribal Council is the governing body of the Hydaburg Tribe in accordance with its Constitution, and by-laws, including "the protection of the Haida Nation membership.

The Hydaburg Cooperative Association has the authority to consult on behalf of its membership with the Federal Government for the well being of the tribe.

The commonality of the customary and traditional use of land, sea, and natural resources is what binds the Haida Nation together. The customary and traditional use of each Village is inseparable from the language, tradition, and ceremonies of the Haida People. This dependency on the surrounding resources is what drives our tribe to protect the resources that surround us.

The Hydaburg Cooperative Association Tribal Council passed Resolution 2007-20 that speaks to the areas of importance and their cultural significance to the Haida people.



The HCA is very concerned about certain alternatives within the TLMP Draft revision document. Specifically, Alternative 4, 5, 6, and 7 propose large scale logging activities within a 15 mile radius of the community of Hydaburg. Key subsistence watersheds will be drastically impacted. Couple these alternatives with the current private timber harvest activities in the same area, we will be faced with a decimated landscape as well as lasting impacts to our most crucial subsistence resources (the natural inhabitants of healthy watersheds and their estuaries).

Most of the areas( Sukkwaan Island, Keete Inlet , Kassa Inlet, and Mable Bay) proposed in Alt. 4 thru 7 are currently road-less. We would like them to maintain the protections from road building and large scale timber harvest. The areas are adjacent to a current LUD II and a Wilderness area. Keeping this area in tact would serve to protect the biodiversity of Cordova Bay for future generations to enjoy. The area is also one of the last untouched surfaces in our traditional territories that we can access for subsistence uses.

Lastly, the cultural significance of the timber itself (namely western red cedar) is of high concern to the Haida People. The Haida people have always had a direct reliance on red cedar to maintain its cultural identity. The current timber market is focused on this specific resource, of which is only available in high quantities in our traditional areas. We are concerned that this critical resource will be targeted and depleted under Alternates 4 thru 7. We see no protections that certify future generations will be afforded the inherent rights to utilize old growth western red cedar to perpetuate our culture into the future.

Thank you for your consideration of our comments and Resolution 2007-20

Respectfully;



Anthony Christianson  
Environmental Planner

Attachment:

Resolution 2007-20 Resolution to Protect Important Areas According to the Customary and Traditional Uses of the Haida People



## HYDABURG COOPERATIVE ASSOCIATION

Resolution No. 2007- 20

### A RESOLUTION TO PROTECT IMPORTANT AREAS ACCORDING TO THE TRADITIONAL AND CUSTOMARY USES OF THE HAIDA PEOPLE

WHEREAS, the Hydaburg Cooperative Association (IRA) is a federally recognized tribe organized pursuant to the authority of Section 16 of the Act of Congress June 18, 1934 (48 Statute 984) as amended by act of Congress, May 1, 1936; and,

WHEREAS the Hydaburg Cooperative Association Tribal Council is the governing body of the Hydaburg Tribe in accordance with its Constitution, and by-laws, including "the protection of the Haida Nation membership; and,

WHEREAS, The Hydaburg Cooperative Association has the authority to establish and enter into contract for the well being of the tribe; and,

WHEREAS, the commonality of the customary and traditional use of land, sea, and natural resources is what binds the Haida Nation together, and the customary and traditional use of each Village is inseparable from the language, tradition, ceremony of the Haida People; and,

WHEREAS, we hold these truths to be self-evident since time immemorial; and,

WHEREAS, the Forest Service is legally obligated to meaningfully consult and collaborate with tribal governments in the development of Federal policies that have tribal implications, as directed by Executive Order 13175; and,

WHEREAS, the Proposed Action of the 1997 Tongass Land Management Plan will have far reaching and profound impacts on tribal communities throughout Southeast Alaska; and,

WHEREAS, the Proposed Action chosen by the Forest fails to adequately protect or respect the customary and traditional uses of Haida traditional use areas. The Proposed Alternatives plan intensive logging activities in some of the last remaining customary and traditional use areas such as Kassa, Keete, Moira, and Mabel Bay, and the 90 documented Haida traditional use sites (and there are more); and,

WHEREAS, the Forest Service's Proposed Action fails to adequately recognize the value of providing lasting protection to important customary and traditional use areas of the Tongass, the history of previous protections, including the 1999 Tongass Land Management Plan Record of Decision, and the 1989 House passed version of the Tongass Timber Reform Act, and community concerns; and,

WHEREAS, the Proposed Action fails to restore important salmon and deer habitat in traditional and community use areas of the people of Hydaburg; and,

WHEREAS, the Forest Service states that "roads pose the greatest threat to fish resources," and that the Haida people have depended on salmon since time immemorial, the Proposed Action almost doubles the number of roads within the Tongass; and,

WHEREAS, areas including Hydaburg, Long Island, Northwest Dall Island, Sukkwaan, Keete, Kassa, Mable Bay, Moira Sound, and other areas that are traditional use areas of the Haida People of Southeast Alaska contain highly valuable watersheds important for subsistence, tourism, fish and wildlife habitat;

NOW, THEREFORE, BE IT RESOLVED, that the Hydaburg Cooperative Association request that the customary and traditional areas Sukkwaan, Dall Island, Keete, Kassa, Mabel Bay, Moira Sound, and other areas within Haida country be removed from the timber base in order to best protect the customary and traditional activities of the Haida People; and,

BE IT FURTHER RESOLVED, that the Hydaburg Cooperative Association urges the Forest Service to heed the request of communities, tribes, and individuals to protect important traditional and customary areas for the good of future generations.

This resolution was duly adopted at the Tribal Council of the Hydaburg Cooperative Association at their regular or special meeting held on this 24<sup>th</sup> day of April 2007 by a quorum of 5 Yes and 0 No and 0 Abstentions.

  
President

ATTEST:   
Tribal Secretary



**Organized Village of Kake**

P.O. Box 316

Kake, Alaska 99830-0316

Telephone 907-785-6471

Fax 907-785-4902 / email KeexKwaan@KakeFirstNation.org

(Federally Recognized Tribal Government serving the Kake, Alaska area)



April 30, 2007

Forrest Cole, Forest Supervisor  
2007 Tongass Forest Plan  
Tongass National Forest  
Federal Building  
648 Mission Street  
Ketchikan, AK 99901

Fax: 907-228-6215

Dear Mr. Cole:

The Organized Village of Kake (OVK) is a duly constituted Indian Tribe organized pursuant to the authority of the Federal Indian Reorganization Acts of 1934 & 1936 with the IRA Council as the duly elected governing body formed under its Constitution & By-Laws. OVK functions as a Federally recognized tribal government to provide services to its membership and, by its Constitution, which includes... "the protection of the tribal membership." The OVK membership has in the ancient past, present and future, used Kuiu Island, Kupreanof Island, parts of Admiralty and Baranof Islands for the customary and traditional use of the plants, animal, fish, land, water and air. The customary and traditional uses of these areas are inseparable from the language, tradition and ceremonies of the OVK Tribe. Kake is located on Kupreanof Island in the Tongass National Forest is home to an annual population of 600 people, with OVK's tribal enrollment comprising approximately 65% of the community.

This letter serves as our Tribe's comment on the updated Tongass Forest Plan. The seven alternatives presented in the Draft Environmental Impact Statement (DEIS) call for annual logging amounts ranging from current levels of approximately 52 million board feet in Alternative 1 to a five-fold increase in Alternative 6, the Proposed Action, to even more in Alternative 7. This Tongass Forest Plan amendment gives the Forest Service the opportunity to respond to changing demands for forest resources. Your decision will impact commercial fisheries from Metlakatla to Yakutat.

The Organized Village of Kake would like to select Alternative One as our preferred Alternative. OVK would suggest the US Forest Service take it's planned dollars that will be used to subsidize road building and logging and redirect it to rural villages that have been affected by the two large 50-year contracts for the Sitka and Ketchikan Pulp Mills and the Ketchikan and Wrangell Saw Mills. The USFS can redirect most of its time and money to work with the Southeast Alaska Hydro-electric Intertie to provide cheaper power to rural communities.

Other issues we want to point out:

- ?? Customary and Traditional Gathering by OVK Tribal Membership: The salmon-producing watersheds on Kuiu, Kupreanof, Baranof and Admiralty are vital to Kake's livelihood and customary and traditional gathering (aka, subsistence use). We support long-term funding for salmon habitat restoration and enhancement projects.
- ?? We support the development of a forest-wide restoration strategy for degraded watersheds that include salmon habitat restoration and forestry enhancement projects such as tree thinning and tree planting.

H-A71

Organized Village of Kake  
TLMP Letter to the U.S. Forest Service  
Page 2

- ?? Because of past and anticipated clearcutting and road building in the region, 75% of Southeast Alaska communities could face a significant restriction to their deer hunting. Some community use areas could lose 50% or more of critical deer winter habitat, depending on which alternative the Forest Service selects. We propose that the USFS not log the areas that provide corridors for the deer. Areas that are critically over-logged need to be restored. Thinning projects could provide valuable employment to residents in rural communities.
- ?? We support no logging roads in undeveloped salmon-producing watersheds on these areas. Roughly 72 percent of all salmon in Southeast Alaska come from unroaded watersheds. The draft Forest Plan states that roads "pose the greatest risk to fish resources." Despite the risks, all alternatives increase road miles on the Tongass between 37 to 127 percent. Instead of fixing the 1,322 culverts that block fish passage on existing roads, the Forest Service wants to spend even more tax-dollars to build more roads. The USFS needs to fix existing problems before you go on to create even more.
- ?? We request that the Forest Service evaluate human disturbances to watersheds at the very beginning of timber sale planning by completing a comprehensive watershed analysis.

The USFS needs to re-prioritize for the 21st century. For decades, the Forest Service spent tens of millions of our tax-dollars every year subsidizing logging and building roads on the Tongass. Industries such as recreation, tourism, commercial and sport fishing, and hunting bring in millions of dollars annually to the regional economy. These industries provide more jobs than the Tongass timber industry—without massive taxpayer subsidies. In Kake, Customary and Traditional Gathering is not just important spiritually and culturally, it is an important economic factor. We do not have the luxury of shopping at a Fred Meyer's or similar grocery stores. Our 'bread basket' includes the streams and watersheds that provide homes to the sea life and wild life that we gather.

Thank you for the opportunity to comment on the 2007 Tongass Forest Plan. Please call, write or email our OVK staff, Mike Jackson, Edna Jackson or Teresa Gaudette if you need more information.

Regards,

*Lincoln A. Bean*  
Lincoln A. Bean  
OVK Vice-President

Cc: Chris Savage, Petersburg Ranger  
SEACC



### Klawock Cooperative Association, Tribe

310 Bayview Blvd.  
P.O. Box 430  
Klawock, Alaska 99925

Phone: 907-755-2265  
Fax: 907-755-8800

April 10, 2007

**Tongass National Forest  
Attn: Forest Plan Adjustment  
Federal Building  
648 Mission Street  
Ketchikan, Alaska 99901**



Dear Madam or Sir:

**The Klawock Cooperative Association, Tribe Council has met on April 10, 2007 at their Regular Council Meeting, and passed resolution 07-32. The Council would like this to be part of the official record for the 2007 Tongass Plan Adjustment as the comments of the Klawock Cooperative Association, Tribe and look forward to working with the Forest Service as they develop a Tongass Land Management Plan for the 21<sup>st</sup> Century.**

**If you shall need to contact me, you can reach me at the phone number or address above. Thank you!**

Sincerely,

*Helen Jackson*  
Helen Jackson  
Treasurer

H-A72



**Klawock Cooperative Association, Tribe**

310 Bayview Blvd.  
P.O. Box 430  
Klawock, Alaska 99925

Phone: 907-755-  
Fax: 907-755-

**RESOLUTION NO. 07-32**

**TITLE: A Resolution To Protect Important Areas According To The Traditional And Customary Uses Of The Klawock People.**

**WHEREAS:** The Klawock Cooperative Association, (hereafter "Tribe"), is a duly constituted Indian Tribe organized pursuant to the authority of Section 16 of the Act of Congress of June 18, 1934 (48 Stat. 984), amended May 1, 1936 (49 Stat. 1250), and

**WHEREAS:** The Klawock Cooperative Association Tribal Council is a duly elected governing body of the Tribe, authorized to act by and on behalf of its members, and

**WHEREAS:** The commonality of the customary and traditional use of land, sea, and natural resources is what binds the Tlingit Nation together, and the customary and traditional use of each village is inseparable from the language, tradition, ceremony of the KCA Tribal Members, and

**WHEREAS:** We hold these truths to be self-evident since time immemorial, and

**WHEREAS:** The Forest Service is legally obligated to meaningfully consult and collaborate with tribal governments in the development of Federal policies that have tribal implications, as directed by Executive Order 13175, and

**WHEREAS:** The Proposed Action of the 1997 Tongass Land Management Plan will have far reaching and profound impacts on tribal communities throughout Southeast Alaska, and

**WHEREAS:** The Proposed Action chosen by the forest fails to adequately protect or respect the customary and traditional use of Tlingit traditional use areas. The Proposed Alternative plans intensive logging activities in some of the last remaining customary and traditional

use areas such as Port Estrella, Port Dolores, Port Santa Cruz - Sumez, San Juan Batista - St. Johns, Point Amargura - Fern Pt. - San Fernando Is. And Fish Egg Island, and

**WHEREAS:** The Forest Service's Proposed Action fails to adequately recognize the value of providing lasting protection to important customary and traditional use areas of the Tongass, the history of previous protection, including the 1999 Tongass Land Management Plan Record of Decision, and the 1989 House passed version of the Tongass Timber Reform Act, and community concerns, and

**WHEREAS:** The Proposed Action fails to restore important salmon and deer habitat in traditional and community use areas of the people of Klawock, and

**WHEREAS:** The Forest Service states that "roads pose the greatest threat to fish resources," and that the Tlingit people have depended on salmon since time immemorial, the Proposed Action almost doubles the number of roads within the Tongass, and

**WHEREAS:** Areas including Klawock, Port Estrella, Port Dolores, Port Santa Cruz - Sumez, San Juan Batista - St. Johns, Point Amargura - Fern Pt. - San Fernando Is., and Fish Egg Is., and other areas that are traditional use areas of the Tlingit People of Southeast Alaska contain highly valuable watersheds important for subsistence, fish and wildlife habitat, and

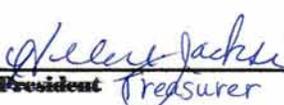
**THEREFORE, LET IT BE RESOLVED:** That Klawock Cooperative Association Tribal Council request that the customary and traditional areas Port Estrella, Port Dolores, Port Santa Cruz - Sumez, San Juan Batista - St. Johns, Point Amargura - Fern Pt. - San Fernando Is., and Fish Egg Is., and other areas within Tlingit Country be removed from the timber base in order to best protect the customary and traditional activities of the Tlingit People, and

**NOW THEREFORE, BE IT RESOLVED:** That the Klawock Cooperative Association Tribal Council urges the Forest Service to heed the request of communities, tribes, and individuals to protect important traditional and customary areas for the good of future generations.

**CERTIFICATION**

**FAXED** By:   
Date: 4-11-07

**This resolution was duly adopted at a regularly held meeting this 10<sup>th</sup> day of April, 2007, by a quorum vote of:**

Yes  No  
   
 President Treasurer Secretary



## Kuiu Thlingit Nation

The Kuye'di of Kuiu Island, Alaska  
 PO Box 8302  
 Ketchikan, Alaska 99901  
 email kuiunation@kpunet.net

*A First Nations Traditional Government -- Indigenous Original Holders of Allodial Title*  
**The Council of the Kuiu Kwáan are members of The first House of The Kuiu Kwáan and the Shakan Kwaan**

**Notice of Flawed Process of the Office of Subsistence Management  
 Notice of Deficiencies and Violations of Tribal Law  
 Notice of Violations of International Law**

**Re:** Rural Review Process Office of Subsistence Management  
**Date:** ~~September 25, 2006~~ March 13, 2007 → B.A.G.S.  
**Location:** Saxman Village

**Jurisdiction**

The Office of Subsistence Management purports to manage access to the traditional lands, waters and resources of Alaska's First Peoples. It wrongfully assumes a management responsibility for resources integral to the continuation of the Indigenous Peoples. When the Thlingit Peoples first arrived in South East Alaska there were no people here before us. The Thlingits displaced no one! We are the First People. We enjoy our Inherent Rights and Status.

The Federal government, the state of Alaska, and the Office of Subsistence Management do not exercise jurisdiction over the Indigenous Nations and Indigenous Peoples resident in region of Alaska, and have no power to deny us our traditional lifestyle, customary use and trade and traditional way of making a living and culture and a way of life that has been labeled by the newcomers as "subsistence" – an arrogant and demeaning term.

As Sovereigns, Indigenous Peoples have equal status to other nations of the world including the United States. Tribal identity must be preserved and the continuation of the First Peoples of the Americas must be insured. The United States has ratified the Covenant on Civil and Political Rights of the United Nations.

The Kuiu Thlingit Nation (aka the Kuye'di Tribe and Kuiu Kwáan) has existed since time immemorial. Its citizens are a permanent population sharing a specific history and territory; a common ancestry and lineage, tribal and ethnic background; religious, linguistic and cultural tradition. The Kuius have never relinquished rights, lands, waters, resources or liberties of any kind to any foreign power. The governing council safeguards the International Statehood and authority of the Nation and implements tribal law as sovereign. Tribal members are entitled to all ancestral rights and titles including those existing prior to contact with any Foreign Peoples including Tsarist Russia, Spain or the United States of America.

---

## Deficiencies of the Current and Proposed Plan

### Special Measures:

The current “plan” is deficient in that it contains no Special Measures recognizing or making provision for the special rights of tribes as indigenous peoples – rights that are mandated by international law, and United Nations covenants, agreements and accords and certain laws of the United States of America.

Dr. Y.N. Kly, Director of the International Human Rights Association of American Minorities (IHRAAM) Specialist in International Human Rights Law, states, “failure to provide priority rights or what is called Special Measures in International Law to the Indian Nations, leading to their extinction would be a grave violation of International Criminal Law, particularly as it relates to the Genocide Convention, to which the US is also a party. On all occasions the majority decision called for non-discrimination to include the requirement of special measures, special rights and self-determination in situations where they were warranted.” The right to remedy under law is well established.

The actions of the Office of Subsistence Management and its parent governments and agencies are in violation of the Human Rights of the Indigenous Peoples. Those actions are illegitimate and actionable especially with regard to the state-wide corruption that has resulted in the theft of enormous amounts of resources.

ANCSA is supposed to add, not take away from, what we own. ANCSA, as great as it seems, is less than a meek offer by the United States and is actually a tear drop in the ocean of our huge assets we already have. ANCSA was written without our input regarding lands, waters, and resources, which cannot be taken away unless we give our consent.

### Subsistence Award to Non-Natives:

By awarding subsistence to non-natives in Alaska, the state of Alaska has attempted to lump all persons, Indigenous and non-Indigenous alike into the same category, denying Indigenous Nations and Peoples their proper sovereign political status. This action has caused devastating impact on small streams and rivers, which have sustained Indigenous villages for thousands of years. Although the criteria utilized by the Office of Subsistence Management in assigning persons subsistence may be appropriate for non-Indigenous persons, it should be brought before the proper tribal authorities for approval and disposition on a Tribe by Tribe basis. The representatives of the federal and state agencies must come to a realization that each Tribe is properly and legally represented by their respective Traditional Tribal Elders and/or Village Councils. Corporations and entities created and funded by the various federal agencies, ostensibly for Indigenous benefit, are merely extensions of the federal agencies. An award of subsistence should in no way diminish tribal sovereignty or tribal rights or be utilized as a tool to exclude a portion of Indigenous peoples from their rights and titles based upon residence or other irrelevant criteria.

### Rural/Nonrural Designations not Applicable to Indigenous Peoples:

The criteria utilized for award of “subsistence” ignores the Indigenous Nations and Peoples of Alaska and their unique political status under International Law, the Constitution of the United States of America, and even the Alaska statehood Act and the Alaska State Constitution.

It is criminal to deny any First Peoples, due to physical residence, access to the resources that insure their health, ability to practice their culture and spirituality, and that guarantee their continuation as a distinct people. As noted to the Office of Subsistence Management in previous communications, our tribal members continue to practice their culture and way of life wherever they may reside.

### “Subsistence” as defined by the Plan Not Applicable to Indigenous Peoples:

We prefer to use the words “traditional lifestyle” as “subsistence” is a non-Indigenous designation that we view as demeaning and arrogant.

Far more than simply supporting life, our traditional lifestyle speaks to the very heart and soul of the Thlingit Peoples. It speaks of respect for and our deep, spiritual ties to Mother Earth and our animal brothers and sisters. It speaks of Thlingits as caretakers, curators and protectors of all the resources of our Great Land.

The Traditional Lifestyle has always been and remains directly related to the spiritual, cultural and historical aspects of the Thlingit Peoples. Traditional foods and materials provide a bond and continuity to our forefathers. We are tied, in the form of respect, to the lands, waters, animals, fishes and fowl.

An Elder once compared the relationship between the Thlingit and our world to the closely interwoven fibers of the Chilkat blankets. Together they are durable and strong. Separating one from the other means the destruction of all. Indeed, the People cannot be true Thlingit unless we adhere to and practice our Traditional Thlingit Subsistence Lifestyle. Subsistence does not mean a tiny measured taste of traditional foods or only what we can carry away in our bellies. It means much more than supplying only immediate requirements. Products from the lands, waters and skies are employed for innumerable uses, such as providing foods, medicines, materials for shelter, waterborne vessels of transportation, clothing, furniture, and ceremonial and ornamental objects of art and providing and generating revenue.

Large quantities of natural resources from our region were utilized on a sustained yield basis. They were traditionally harvested, processed and stored. Portions of the harvest were commercially bartered, traded or sold to gather and accumulate wealth for days when families, Clans or Tribes would be required to assist in times of want or tragedy. When a Clan laid up goods, those goods served as a form of insurance for retirement and old age. A large portion of the first harvest was traditionally given to the elderly or incapacitated. The People commercially

sold and bartered any or all of these items to secure by trade or purchase other goods that we do not manufacture or produce by our own efforts.

Our traditional lifestyle means the right to full, unrestricted utilization of the elements of our environment within the spiritual traditions, cultural traditions and customs of the Kwáan. These resources include:

Fishing. The Kuiu Kwáan have always utilized all resources located in both the fresh water and salt water systems for home and Tribal use, for barter and trade, or selling commercially whatever we chose, and what is available.

These water resources include, but are not limited to, all species of salmon that travel or pasture in our waters, bottom fish, trout, herring roe on kelp, all shellfish and crustaceans, various land, seabed vegetation and plants, and whatever is touched by the salt and freshwater systems.

Hunting. Traditional Subsistence has also includes utilizing all land mammals such as deer, moose, mountain goat, Mountain Sheep, brown bear, black bear, wolves, all fur-bearing mammals and virtually every animal that inhabits the region of the Kuiu Kwáan. All birds are utilized for food or ornamental use.

Forest and Land Products: All species of trees and vegetation are utilized for medicines, clothing, shelter and to enhance the quality of Subsistence Lifestyle.

Spirituality, Happiness and Well-being: The Thlingit People cannot be Thlingit without access to the lands, waters and resources that have been available to them from Tribal Lands for thousands of years.<sup>1</sup>

Traditional Economic Systems:

Traditional Economic Systems refers to the organized production and distribution of goods and services of a People, which enables them to live, subsist and continue as a people off the resources available to them. These systems include all the goods and services necessary to maintain all aspects of the culture to increase the survivability potential of the human being and his family, Clan and Kwáan.

In Southeast Alaska, Subsistence Economic Systems have their basis with the Traditional Thlingit Kwáans that hold allodial title to their bioregional, kinship related regions. They are dependent upon distribution within Tribal systems that are based upon cooperation and need (rather than competition and greed).

This requires an inventory of the resources available within the Kwáan or Village structure, prioritizing these resources by their relative importance and abundance, and designation of the surplus resources to be used in the transfer or trade to other individuals, groups or nations.

The Kwáan Council (The Government of the Kuye'di) protects the Tribal Member's human rights and economic rights to resources. All Kwáan Members have a Trust Responsibility to respect, protect and nurture the resources. To do otherwise is *Thlickaws*. *Thlickaws* is an act of disrespect and ignorance or an act that breaks the Great Treaty. The perpetrators of such acts unleash negative forces upon themselves and their People. It is the same as asking for bad luck. It can result in grave consequences such as resources no longer being available.

Finally, The Indigenous Peoples, Tribes and Nations, have first priority to utilize all the resources of their respective regions. The immigrant peoples with their various entities, corporations and structures, may then utilize, only with agreement with each Tribe, the surplus as identified by the Indigenous Leadership.

Signed:

What Shaw George A James Jr

Mawina Charles SR

Ben James Sr

Melvin J. Charles

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

H-A76

**Resolution No. 07-11**  
BY THE COUNCIL ANNETTE ISLANDS RESERVE  
METLAKATLA INDIAN COMMUNITY

**WHEREAS**, the Metlakatla Indian Community Council is the governing body of the Metlakatla Indian Community, Annette Islands Reserve, Alaska by the authority of the Constitution and By-laws of the Metlakatla Indian Community as approved on August 23, 1944 by the Secretary of the Interior; and

**WHEREAS**, the Metlakatla Indian Community is an Indian Tribe organized under the provisions of Section 16 of the Indian Reorganization Act, 25, U.S.C. Section 476; and

**WHEREAS**, the Metlakatla Indian Community, for centuries, has utilized all the natural resources of the land and waters in its traditional homeland for cultural activities, subsistence, gathering and general wellbeing, which lands include much of what is now the Tongass National Forest that are subject to the jurisdiction of the United States Forest Service; and

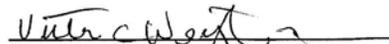
**WHEREAS**, the Metlakatla Indian Community, also has enjoyed the benefits of commercial logging and the sales of lumber products for its economic wellbeing and has opposed the shutdown of the Tongass National Forest as a source of raw materials for the Community's timber related industries; and

**WHEREAS**, the Metlakatla Indian Community, as a result of its multiple uses of the lands and waters within its homeland for cultural, subsistence and economic wellbeing, recognizes the need to balance the commercial use of resources from the forests with the need to protect vital fish and wildlife habitat, subsistence hunting and gathering areas and cultural sites; and

**WHEREAS**, the Metlakatla Indian Community, has carefully considered the foregoing balance regarding the uses of Gravina Island and recognizes that the island is far more valuable as a place where traditional uses are promoted, wilderness values preserved and wildlife habitat protected rather than as a place for commercial activities.

**NOW THEREFORE BE IT RESOLVED**, the Metlakatla Indian Community Council hereby request that, in its efforts to modify the Tongass Land Management Plan to comply with law, the Forest Service designates all federal land on Gravina Island to be wilderness or wilderness monuments or such other designation that will ensure that no further development takes place on the island and that it is preserved as a place where traditional cultural and subsistence activities can be pursued for all generation to come.

Signed and dated this 6<sup>th</sup> day of March 2007 at Metlakatla, Alaska  
METLAKATLA INDIAN COMMUNITY

  
Victor C. Wellington, Sr., Mayor

ATTEST:

  
Judith A. Eaton, Executive Secretary

**CERTIFICATION**

I hereby certify that the foregoing Resolution was duly approved at a meeting of the Tribal Council Executives held on March 6, 2007 at which a quorum was present by a vote of 7 FOR and 0 AGAINST.

Signed:

  
Judith A. Eaton, Executive Secretary

H-A77

ORGANIZED VILLAGE OF SAXMAN  
Saxman I.R.A. Council  
Phone (907) 247-2502 Fax (907) 247-2504  
Route 2 Box 2 - Saxman; Ketchikan, Alaska 99901

RESOLUTION # 02-02-01

**A RESOLUTION BY THE SAXMAN IRA COUNCIL, WHO IS THE TRIBAL GOVERNING BODY OF THE ORGANIZED VILLAGE OF SAXMAN OBJECTS TO ANY TIMBER CUTTING ON GRAVINA ISLAND.**

WHEREAS, The Organized Village of Saxman (O.V.S.) is a duly constituted Indian Tribe, organized pursuant to the authority of Congress by the Indian Reorganization Act and such Legislation of June 18, 1934 and May 1936; and

WHEREAS, The Saxman IRA Council is authorized by the Organized Village of Saxman Constitution and By-laws approved on October 18, 1940 by the Secretary of Interior, and ratified on January 14, 1994 as the Tribe's governing body; and

WHEREAS, The Organized Village of Saxman is the Federally Recognized Tribe, governed by the Saxman IRA Council, who has the authority to represent and act in all matters that concern the health, education, and welfare of the Native people who reside in the Village of Saxman; and

WHEREAS, The United States Forest Service is proposing a timber cut on Gravina Island which has been our Tribal members food locker for hundreds of years; and

WHEREAS, Gravina Island is within the Tongass National Forest and is within the Timber Land Management Plan, and

WHEREAS, The Organized Village of Saxman has not participated in the development of the Timber Land Management Plan; and

WHEREAS, It is the opinion of the Organized Village of Saxman that TLMP is obsolete for today's plan because of many things that has happened since the plan has been approved without Tribal consent or input; and

WHEREAS, Gravina Island has been feeding our Tribal Members by way of hunting of the deer, and many different kinds of sea food, and the gathering of berries which provides for our food pantry for the Village of Saxman; and

WHEREAS, It is the Organized Village of Saxman belief that once cutting of timber on Gravina Island it will be easier to do in the future; and

WHEREAS, the cutting of timber will disrupt the food supply that has been feeding our Tribal Members for hundreds of years, and

WHEREAS, The Organized Village of Saxman has met with officials from the Forest Service on number of occasions and relayed this message, No Timber Cutting on Gravina Island, and

NOW THEREFORE BE IT RESOLVED the Organized Village of Saxman objects to any timber cutting on Gravina Island

CERTIFICATION:

Passed and Approved by a duly constituted quorum of the Saxman IRA Council.

*Joe Williams* 2/19/02  
Joe Williams, II President Date

ATTESTED:

*Nora DeWitt* 2/19/02  
Nora DeWitt, Saxman IRA Council Secretary Date

H-A78

**ORGANIZED VILLAGE OF SAXMAN**  
Saxman I.R.A. Council  
Route 2, Box 2 – Saxman; Ketchikan, Alaska 99901  
Phone 907-247-2502 / Fax 907-247-2504

**RESOLUTION #07-06-94**

**A RESOLUTION FOR THE ORGANIZED VILLAGE OF SAXMAN BY THE SAXMAN I.R.A. COUNCIL TO STRONGLY REQUEST THE U.S. FOREST SERVICE TO PROTECT AND PRESERVE ALL WATER SHEDS THAT FEED INTO BOSTWICK INLET, AND TO REASSIGN THE U.S. FOREST SERVICE LAND USE DESIGNATION VALUE COMPARISON UNIT (VCU) 7630 FROM TIMBER PRODUCTION TO SEMI-REMOTE RECREATION.**

**WHEREAS**, The Organized Village of Saxman is a duly constituted Indian Tribe organized pursuant to the authority of the United States Congress by the Indian Reorganization Act, and such legislation of June 8, 1934; and

**WHEREAS**, the Saxman I.R.A. Council is authorized by the Organized Village of Saxman Constitution and Bylaws approved on October 18, 1940 by the Secretary of Interior, and ratified on January 14, 1941, as the Organized Village of Saxman governing body; and

**WHEREAS**, the Organized Village of Saxman is the federally recognized tribe governed by the Saxman I.R.A. Council, who has the authority to represent and act in all matters that concern the health, education, and welfare of the Native people who reside in the Village of Saxman; and

**WHEREAS**, the Organized Village of Saxman is a federally recognized Tribe with all powers and responsibilities inherent in a sovereign government; and

**WHEREAS**, since time immemorial the economy, culture, spiritual tradition, and way of life of tribal citizens has been centered around fishing, hunting, and gathering natural resources, and the lands and waters in and around Bostwick Inlet are a natural food pantry ensuring a manner to sustain ourselves, for our grandchildren, and for seven generations and beyond; and

**WHEREAS**, all natural resources will suffer greatly if timber production occurs during any years to any water sheds feeding into the Bostwick Inlet Bay as timber production will adversely affect fishing, gathering, and hunting causing substantial harm to tribal citizens and the surrounding tribal communities; and

**WHEREAS**, these detrimental changes will impact our tribal sovereignty and a heartbreaking loss to the practice of customary and traditional harvesting of food for a tribal community dependent upon Bostwick Inlet; and

**WHEREAS**, it is particularly significant and critical to continue to fish, hunt, harvest, and gather in an accessible customary and traditional site for the revitalization and continuity of tribal Native culture and to carry on our traditions in Bostwick Inlet; and

**WHEREAS**, significant harm will afflict tribal natural and cultural resources from the creation and dissemination of large volumes of timber production creating other forms of pollution across the lands and watersheds feeding into Bostwick Bay; and

**WHEREAS**, salmon, other fish, wildlife, plants, other natural resources and cultural resources are important parts of our culture, economy, spiritualism, and way of life, and any harm to these harms us; and

**WHEREAS**, timber production execution in VCU 7630 will displace tribal citizens and have a direct economic and social impact creating a loss of assets or access to assets adversely impacting the tribal citizens' means to a livelihood; and

**Second Page of Resolution #07-06-94**

**WHEREAS**, scientific findings are not conclusive to the extent or impact timber production will have on the waters and lands at the conclusion of timber harvest and seven generations henceforth; and

**WHEREAS**, local tribal citizens are unable to devote countless hours to learn about, discuss, and debate land management options, but are aware of the sacredness and significance of Bostwick Inlet's food pantry provisions, and

**WHEREAS**, the U.S. Forest Service seeks out the promotion of a "collaborative approach" between agencies, partners, tribes, and local public (including tribal citizens) as a strategy on the use of forest lands and the Saxman I.R.A. Council believes its communication by resolution is a part of this approach; and

**WHEREAS**, the Saxman I.R.A. Council urges the U.S. Forest Service not to marginalize the social, economic, cultural identities of the tribal citizens of the Organized Village of Saxman by further timber harvest and to take positive action to safeguard the watersheds feeding into Bostwick Inlet.

**NOW THEREFORE BE IT RESOLVED**, the Organized Village of Saxman, Saxman I.R.A. Council hereby requests that the U.S. Forest Service and its officers deem the highest degree of protection for the watersheds feeding into Bostwick Inlet; and

**BE IT FURTHER RESOLVED**, the Organized Village of Saxman, Saxman I.R.A. Council requests the U.S. Forest Service and its officers to eliminate timber harvest in VCU 7630 and minimize risks to jeopardizing a means of livelihood to tribal citizens; and

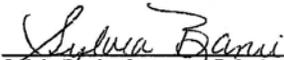
**BE IT FINALLY RESOLVED**, the Organized Village of Saxman, Saxman I.R.A. Council vigorously requests the U.S. Forest Service to protect and preserve all water sheds that feed into Bostwick Inlet, and to re-assign the Value Comparison Unit (VCU) 7630 from Timber Production to Semi-Remote Recreation.

**CERTIFICATION:**

**PASSED** and **APPROVED** by a duly constituted quorum of the Saxman I.R.A. Council on the 18th day of July 2006 in Saxman, Alaska by a vote of 3 For, 0 Against, 0 Abstentions and 2 Absent.

**ATTESTED:**

  
Lee Wallace, Saxman I.R.A. Council President      7/18/2006  
Date

  
Sylvia Bani, Saxman I.R.A. Council Vice President      7-18-06  
Date

66  
RECEIVED

APR 23 2007

Ketchikan-Misty Fjords  
Ranger District

ADK  
2/27/07

ORGANIZED VILLAGE OF SAXMAN  
Saxman I.R.A. Council  
Route 2, Box 2; Ketchikan, Alaska 99901  
Phone 907-247-2502 / FAX 907-247-2504

April 18, 2007

Denny Bschor  
Regional Forester  
Alaska Regional Office – Tongass National Forest  
P.O. Box 21628  
Juneau, Alaska 99802-1628

Dear Denny Bschor,

The Saxman I.R.A. Council is submitting the enclosed official resolution which was approved at the March 20, 2007 Organized Village of Saxman, Saxman I.R.A. Council Meeting. Please let our resolution serve as the official position on the *Forest Plan Adjustment*. The Saxman I.R.A. Council is pleased to sign this resolution with a strong recommendation to protect and preserve significant cultural/spiritual/life-giving/healthy ecosystems within the Tongass National Forest.

I appreciate the opportunity to provide our tribal resolution for Bostwick Inlet, Yes Bay, Cat Island, and Duke Island. Thank you for defending critical areas of the *Tongass* – and for your commitment and hard work.

Sincerely,



Lee Wallace  
President

copy: Saxman I.R.A. Council  
Lynn Kolund, District Ranger  
Forrest Cole, Forest Supervisor  
Lee Kramer, Project Team Leader

ORGANIZED VILLAGE OF SAXMAN  
Saxman I.R.A. Council  
Rt. 2, Box 2 (Saxman); Ketchikan, Alaska 99901  
Phone 907-247-2502 / Fax 907-247-2504

**RESOLUTION #03-07-104**

A RESOLUTION FOR THE ORGANIZED VILLAGE OF SAXMAN, SAXMAN I.R.A. COUNCIL URGING THE U.S. FOREST SERVICE ALASKA REGION TO PROTECT HIGH VALUE AREAS OF BOSTWICK INLET, YES BAY, CAT ISLAND, AND DUKE ISLAND AS IT IMPROVES THE REVISION OF LAND AND RESOURCE MANAGEMENT PLANS (FOREST PLANS) FOR EACH OF THE NATIONAL FORESTS IN THE NATIONAL FOREST SYSTEM.

WHEREAS, the Organized Village of Saxman is a duly constituted Indian Tribe organized pursuant to the authority of the United States Congress by the Indian Reorganization Act, and such legislation of June 8, 1934; and

WHEREAS, the Saxman I.R.A. Council is authorized by the Organized Village of Saxman Constitution and Bylaws approved on October 18, 1940 by the Secretary of Interior, and ratified on January 14, 1941, as the Organized Village of Saxman governing body; and

WHEREAS, the Organized Village of Saxman (OVS) is the federally recognized tribe governed by the Saxman I.R.A. Council, who has the authority to represent and act in all matters that concern the health, education, and welfare of the Native people who reside in the Village of Saxman; and

WHEREAS, the Organized Village of Saxman is a federally recognized Tribe with all powers and responsibilities inherent in a sovereign government; and

WHEREAS, in August 2005, the U.S. Circuit of Appeals for the Ninth Circuit issued a decision in *Natural Resources Defense Council, et al., United States Forest Service, et al., 421 F.3d797 (9<sup>th</sup> Cir. 2005)* that found deficiencies and inadequacies in the process used to develop the 1997 Forest Plan revision; and

WHEREAS, the U.S. Circuit of Appeals for the Ninth Circuit specifically found deficiencies and inadequacies related to timber demand, the range of alternatives considered relative to timber demand and potential effects on roadless areas, and cumulative effects from activities conducted on non-National Forest System lands; and

WHEREAS, the U. S. Forest Service has specified that a 5 Year Plan Review (completed in January 2005) indicates a need to amend the current Tongass National Forest Land and Resource Management Plan; and

WHEREAS, the Organized Village of Saxman, Saxman I.R.A. Council seeks to preserve and afford protection of biodiversity and healthy ecosystems, wildlife habitat, sea life and fish habitat of Bostwick Inlet, Yes Bay, Cat Island, and Duke Island ensuring seven generations forthcoming will inherit and benefit from these high value areas; and

WHEREAS, the Organized Village of Saxman, Saxman I.R.A. Council strongly supports protection of the biodiversity and healthy ecosystems, wildlife habitat, and sea life and fish habitat of the Tongass National Forest lands and waters, and discourages the present and future environmental threat by timber harvest to the areas of Bostwick Inlet, Yes Bay, and Cat Island; and

Continuation of Resolution 02-07-104, page 2:

WHEREAS, the Organized Village of Saxman, Saxman I.R.A. Council is strongly against continued mineral exploration on Duke Island and firmly maintains that Duke Island be

withdrawn from any further mining claims for the present and future protection of Duke Island because it is an ideal site for numerous migratory birds including geese, and because Duke Island is a significance high use "crossroads" area for the Tlingit, Haida, and Tsimshian nations for salmon and bottom fish harvesting, and it possesses a historical link and cultural connection to past ancestors, and lastly the Draft E.I.S. Tongass Land and Resource Management Plan (January 2007) on page 3-280 states: "Alternatives 4 - 7 would have a somewhat greater, but unknown, potential to contribute to cumulative effects associated with mineral activity.";

WHEREAS, the Draft E.I.S. Tongass Land and Resource Management Plan (January 2007) explains that the alternatives are constructed using the LUD allocations defined in the 1997 Tongass Forest Plan as the base, and the Organized Village of Saxman objects to the manner of using the 1997 Tongass Forest Plan as a base for constructing LUD allocations knowing that in 1997 and years prior to 1997, the Forest Service did not engage or establish consultation or cooperation with tribal officials of Saxman when the undertaking and formulation and implementation of the 1997 Tongass Forest Plan was developed; and

WHEREAS, in OVS Resolution 02-02-01 and OVS Resolution 07-06-94 from the Organized Village of Saxman, these resolutions attest to tribal and community member's use and harvest of a significant food supply and life giving nutrition from lands and water of Bostwick Inlet on Gravina Island.

NOW THEREFORE BE IT RESOLVED, that the Organized Village of Saxman urges the U.S. Forest Service to lessen and prevent irreversible harm to Bostwick Inlet, Yes Bay, Cat Island, and Duke Island by eliminating timber harvest and mineral exploration, and for the U. S. Forest Service to ensure a standard and guideline limiting timber harvest and mineral exploration activities that will assure exemplary stewardship for Bostwick Inlet, Yes Bay, Cat Island, and Duke Island for seven generations beyond the present; and

THEREFORE BE IT RESOLVED, the Organized Village of Saxman vehemently requests the U.S. Forest Alaska Region to protect, safeguard, and defend high value areas of Bostwick Inlet, Yes Bay, Cat Island, and Duke Island as it improves the revision of land and resource management plans (Forest Plans) for each of the national forests in the National Forest System.

CERTIFICATION:  
PASSED and APPROVED by a duly constituted quorum of the Saxman I.R.A. Council on the 16<sup>th</sup> day of April, 2007 in Saxman, Alaska by a vote of 5 For, 0 Against, and 0 Abstentions.

*Lee Wallace* 4/18/07  
Lee Wallace, Saxman I.R.A. Council President Date

ATTESTED:  
*Ginger M. Fox* 04/19/07  
Ginger M. Fox, Saxman I.R.A. Council Secretary Date

# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

April 12, 2007

Mr. Forrest Cole, Forest Supervisor  
US Forest Service  
Alaska Region, Tongass National Forest  
648 Mission St.  
Ketchikan, AK 99901



RE: Draft Environmental Impact Statement & Draft Proposed Land and Resource Management Plan

Dear Mr. Cole:

The Sitka Tribe of Alaska (STA) is a federally recognized tribal government, and represents over 4,084 tribal citizens based in Sitka. STA is responsible to protect the health, safety, welfare, and culture of our citizens. With this responsibility, Sitka Tribe is reviewing and commenting on your Tongass Land and Resource Management Plan Amendment.

Sitka Tribe of Alaska's customary and traditional territory reflects the lands and waters historically and presently of the Sheet'ka Kwaan, and as such is composed of the western side of Baranof Island, the greater reaches of Peril Strait, southwestern portions of Chichagof Island, and the myriad of islands as well as the waters between these locations.

Sitka Tribe is wary of supporting any of the proposed alternatives listed in the Environmental Impact Statement for the Tongass Land and Resource Management Plan. All of the alternatives contain a Right-of-Way for the Rodman Bay road, which Sitka Tribe strongly opposes. As one tribal member adamantly stated "I am disgusted with the road proposal." There are many in the Tribe who would prefer no option, no development because any development would affect our Customary and Traditional hunting, gathering and fishing sites.

If forced to support an alternative, after reviewing the options Sitka Tribe supports Alternative 1 with the exception of the Right-of-Way for the Rodman Bay road. This alternative would have the least impact on our Customary & Traditional resources and our cultural and sacred sites.

Sitka Tribe would like to address the following areas that are impacted by this plan. Sitka Tribe will not address each alternative and their potential impact because it is understood with each alternative, other than Alternative 1, will substantially affect subsistence, biodiversity, and environmental health. Alternatives 4 through 7 will have devastating impacts on Baranof Island and Sitka Tribe strongly opposes these alternatives.

H-A81

---

### Land Use Development

Sitka Tribe recognizes the need for economic development, and wants to see economic development that will provide employment or contracting opportunities for our Tribal Citizens. Alternative 1 offers the least disruptive amount of timber harvesting; balancing between moderate and intensive harvesting the total harvest would be 52 million board feet, affecting 1.2 million acres. On Baranof Island deer habitat would receive significant reductions under all alternatives. deer habitat would receive substantial reductions under all alternatives, other than Alternative 1. The magnitude of effect is concentrated particularly on Baranof Island in Alternatives 4 through 7. Under all plans, the harvest on Baranof affects areas that are primary Customary and Traditional hunting and gathering sites.

The Forest Service needs to increase their efforts to manage these stands on Baranof to increase biodiversity. Currently there are four (4) areas on Baranof where the harvest of Sitka deer exceeds 10% of the estimated habitat capability. Without question, any further development will affect the habitat in a negative manner.

Sitka Tribe propose the impact be mitigated by treating the pre-commercial and young growth forest that has developed on the island through past clear cutting by thinning, chipping, and burning slag in place. Thinning is an activity that not only encourages local hire but also will increase the biodiversity of the stands- improving scenic quality, concentrating growth in the fewer larger trees, and improving wildlife habitat.

**Steps must be made to remove logging slash that has scarred the habitat on Baranof for decades and rehabilitate the acreage through treatment or reseeded.** Sitka Tribe of Alaska encourages the Forest Service to form partnerships with private and public organizations utilizing such organizations such as the Ketchikan Wood Technology Center and other Forest Service Science Centers to address and correct this specific issue. Grants such as Woody Biomass Grants, FS Tribal Granting programs can be utilized in solving the problem of how to utilize low valued material removed from the habitat. Sitka Tribe would commit itself in collaborating with the Forest Service in addressing the forest slash and pre-commercial and young forest growth to improving this environmental and working toward a healthy biodiversity habitat. One Tribal Member in recommending effective slash treatment stated, "In Washington and Oregon the logging companies are required to treat before they wave the logging site, and treating means they burn and spread the ashes of large stumps. The material that can be chipped is spread around once processed, so no piles of debris are left scattered everywhere. These suggestions are a better solution rather than removing the slabs."

Tribal Citizen John Nielsen stated at an STA Cultural Committee meeting, "I've been a resident of Sitka for seventy-seven years. The damage that the Forest Service has done to this country has been devastating. The harvest areas that were clear-cut thirty or forty years ago have been damaged and are subject to mudslides. All the alternatives have the proposed road, and I don't want the road put in place. If the road is put in place, there will be no regulations on vehicles and this would damage the area more. The Tribe should say 'NO' to the proposed road. The previous damage to the habitat ruined fish streams at Nakwasina, Fish Bay, Ushk Bay, Poison Cove, and Fick Cove. Now they want to farm fish and that is not the way to go since it doesn't

make good dry fish. I don't want to see no more clear cutting and no more new roads being built. There should be a way to figure out how to put fish back in the streams."

### Trails and Road Development

Sitka Tribe of Alaska was very concerned when the Sitka Access issue came up a few years ago, and Sitka Tribe held a Tribal Citizens' meeting with members of our cultural committee, Customary and Traditional Committee, Herring Committee, and Native Allotment owners, among others. After gathering input from this meeting, Sitka Tribe **opposed** the Rodman Bay alternative. Sitka Tribe supported the Warm Springs route is the least invasive of the roads proposed for "improving" ferry service.

Sitka Tribe is very concerned that *all of the alternatives* contain a Right of Way for the Rodman Bay road. Sitka Tribe is *strongly opposed* to a Right of Way for the Rodman Bay road. Sitka Tribe of Alaska stands opposed to any further road development. Again the Tribe reiterates that Sitka Tribe are mandated to protect the hunting, gathering and fishing habitat of our tribal members.

Sitka Tribe is wary of new trails, and would like to be informed of all proposed trails. All trails and roads will impact traditional hunting, gathering and fishing sites, historical and sacred sites to varying degrees. Any trail and road development will increase access to these sites. Increase in access will amplify the impact on the biodiversity of the areas cited for development. A large percentage of the trails and roads proposed will utilize old logging trails that initiated environmental damage to the habitat in the 50s and 60s. Should any development occur, Sitka Tribe propose that in addition to upgrading the trails and roads, funds be utilized for habitat restoration. Examples of habitat restoration Sitka Tribe would like to see include clearing the slags, stumps, rehabilitating the habitat through thinning and other means. Sitka Tribe encourage the Forest Service to develop whatever means possible to restore the clear-cut areas to enhance the biodiversity of the habitat.

### Native Allotments:

The land use development plan as well as the trails and roads affect our current and pending allotments. Since time immemorial, Tlingits have utilized this country for settlements, for both summer and winter harvesting campsites. It was not until the middle of the 20<sup>th</sup> century that an Alaska Native was even allowed to own property. From the beginning of our relationship with the federal government, aboriginal title has been largely ignored until the discovery of oil on the North Slope brought about an immediate need for settlement of aboriginal title. The Allotment Act was instituted but never implemented until "Pence vs. Kleppe" forced BLM to reopen allotment applications that were closed without due process. Due process difficulties have exponentially been made more complicated by time, loss of witnesses, Forest Service removing substandard cabins, etc. Only a fraction of camps will be returned to their rightful owners in the Sheet'ka Kwaan territory.

Many of the allotments awarded have been damaged by clear-cutting and other means. By its definition, allotment land is federal property and as such is the responsibility of the United States Government to protect. The Forest Service by definition is a part of the United States Government. Allotments have been damaged in part due to the misfeasance of the Forest Service. The Forest Service, not unlike the Sitka Tribe of Alaska, the Bureau of Indian Affairs, Park Service and the

Bureau of Land Management, has a responsibility to ensure the protection of the rights of the allottees to enjoy their allotments and realize the full benefits intended in the title.

Native allotments are situated in prime subsistence habitats. All trails, roads, land use development plans will impact some if not all of the allotments (with the possible exception of the Warm Springs road plan). **The Forest Service needs to take affirmative action not only to correct past wrongs but also to prevent future damage to allotments.** Sitka Tribe of Alaska encourages the Forest Service to enjoin a partnership with us to ensure the protection of the allotments and develop sound management to ensure future use to the maximum extent possible.

Sacred Sites:

Sitka Tribe greatly appreciates the efforts of the Forest Service, and specifically John Autrey, to work with the Tribe on drawing up a sacred sites policy. Sitka Tribe is very pleased to see this as part of the Forest Plan. The Forest Service needs to continue acting with continued due diligence in regard to acknowledging and recording sacred sites. The Forest Service will actively ensure that all Forest Service Officers and Line Officers require all employees: 1) Protect tribal cultural and historical information, 2) Consult with Tribes on matters that may affect tribal rights and interests, 3) Work with the Tribes in providing research, transfer of technology, and technical assistance where needed or agreed to concerning cultural and historical information, 4) Ensure that repatriation of Native American human remains and associated funerary objects is done in accordance with the requirements of the Native American Graves Protection and Repatriation Act.

Scientific evidence now embraces the fact that Tlingit have inhabited the Tongass for at least 10,000 years. Baranof Island has been the home to Tlingit since time immemorial. In recent history, Katlian's battle of 1804 has been marked in history as the last armed battle of aboriginal natives of North America against Europeans. It also marked the end of the expansion of the Russians in North America. Ad infinitum, this battle marks the determination and will of all Tlingit to protect their home and its infinite blessings the Tongass gives to its people. Land use development, trails, and roads will not only affect the biodiversity of the habitat but also will directly traverse Native allotments, historical and sacred sites including Katlian's retreat. Any development will require the due diligence and care by the Forest Service in working with the Sitka tribe in identifying and protecting these, sites, camps, villages and trails.

Tribal citizen Duck Didrickson stated at an STA Cultural committee meeting, "This is sacred land. There are many sacred places and the proposed road needs to be opposed now. The previous clear cuts have scarred the land, and people were told that in fifty years the land would be back to normal, which hasn't happened... There should be a plan established for the timber harvest and it should be presented to the Tribe how it's going to be done. There are many sacred places on the proposed road that should be protected. They should use helicopters rather than build a road on the land that the Tlingits have used for thousands of years. If there is timber cut in the proposed areas, the sacred lands will be gone."

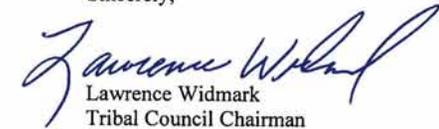
In conclusion, Sitka Tribe can support only Alternative 1 *without the Rodman Bay road Right-of-Way*. Sitka Tribe also encourages the Forest Service to emphasize the rehabilitation of areas clear-cut in the Sitka area. Restorative measures need to be emphasized. Sitka Tribe of Alaska needs to be a party in any plan the Forest Service adopts. Sitka Tribe encourage the Forest

Service to adopt local hire and utilize Native hire in its practices that has been exercised in Angoon and Hoonah for maintenance and rehabilitation in the development of trails and roads, cabins and other recreational sites the Forest Service develops. The labor force for the logging and wood products sector in southeast Alaska is comprised of 35% nonresidents. One Tribal member stated "In previous instances, they have hired from down south and met the knowledge of local culture requirement by accepting the statement that they can learn the Native culture. The local and Native hiring policy should be more concrete than a puff of smoke." Sitka Tribe asks that the Forest Service to work cooperatively with the Sitka Tribe and the city of Sitka in reducing the nonresident work force in the logging and wood products industry on Baranof Island to the single digits.

The Tongass Land and Resource Management Plan Amendment while comprehensive is not conducive to thorough review of the developments and or plans that may impact Tribal Customary and Traditional Country. For example in Land Use Designations for timber harvests for each alternative the presentation is on a forest wide harvest. Sitka Tribe would like to see the alternative plans be identified into more specific areas such as Baranof Island where Tribal citizens can have easy access to and discern where the timber production would be, the allowable sale quantity and quality, and the impact designation for Baranof Island through each alternative plan.

In closing, thank you for this opportunity to comment. Sitka Tribe wishes to emphasize the importance of our Customary & Traditional [subsistence] resources and the importance in our cultural sites in *any* alternative considered. If you have any questions, please do not hesitate to contact Helen Dangel Lorrigan, Resource Protection Director for Sitka Tribe at (907) 747-3207.

Sincerely,

  
Lawrence Widmark  
Tribal Council Chairman

CC: Sitka District Ranger Carol Goularte

H-A83



**YAKUTAT TLINGIT TRIBE**  
 P.O. BOX 418  
 YAKUTAT, ALASKA 99689  
 PHONE (907) 784-3238 FAX (907) 784-3595

May 7, 2007

Tongass National Forest  
 Attention: Forest Plan Adjustment  
 648 Mission Street  
 Ketchikan, AK 99901

This letter serves as the Yakutat Tlingit Tribe's official public comment regarding the draft Tongass Land Management Plan (TLMP). The Yakutat Tlingit Tribe has thoroughly evaluated all the Alternatives as well as the Standards and Guidelines, but limited our comments as they apply to the Yakutat Ranger District. We respect other Tribe's and communities opinions with respect to their preferred Alternatives and draft EIS as a whole.

The Yakutat Tlingit Tribe has chosen to modify Alternative 2, in particular the LUD boundaries and designations, to fit with our tribal members' and communities desire for only small timber sales in the Yakutat District. "Just under two-third of residents (61%) also support or strongly support small timber sales" according to the Yakutat Community Opinion Survey: An Analysis of Planning and Development Issues in Yakutat (October 2005, prepared by Sheinberg and Associates for the City and Borough of Yakutat).

You will find an attached map representing the Tribe's wishes to eliminate industrial logging within the Yakutat Ranger District but fulfill small local sawmill and personal use needs by changing the LUD along FS 10 from Timber Production to Modified Landscape designation. All other land outside of this designation have been converted to Semi-Remote LUD.

The boundaries of this LUD were moved outside of the Greater Situk Watershed as significant timber harvest and salvage sales have occurred in this very important area. The Yakutat Tlingit Tribe wishes to protect the Greater Situk Watershed from further timber harvest and salvage in order to sustain a critically important commercial salmon fishery and a world-class sport fishery until it the watershed has been restored. The eastern boundary was lengthened along FS 10 to offer more acres of small timber sales in roaded areas easily accessed by local small sawmill owners. This boundary and LUD change will allow provide approximately 8,984 acres of National Forest for sustainable harvest

Within the Scenic Viewshed and Modified Landscape LUDS we recommend the following changes to TLMP for the Yakutat Ranger District:

**1.) Support 200-year rotation with pre-commercial and commercial thinning at logical intervals when needed.**

Conversations with local sawmill owners and USFS studies indicate that 200 years is a minimum time span for harvested units to begin producing saw log quality trees and protecting many species (Hanley et al. 2005).

**2.) Support selected harvest and small 1-2 acre "patch cuts"**

This style of harvest is possible in Yakutat due to the flat topography. Small patch cuts do not open the forest canopy as readily to the wind as does large clear cutting methods. Selected harvest, when done correctly, provides for continuing forest function and remains useful for wildlife, watershed health and the public

**3.) Support small sales to meet community needs and create small timber base for value-added wood industry (wood toys, instrument wood, molding, beams, etc.)**

The Yakutat Community Opinion Survey conducted in 2005 indicated that 61% of the community is in favor of a small sales program. Only 17% of the community was opposed to this level of logging.

**4.) Require research into windthrow patterns for use in harvest planning**

On page 3-33 of the West Forelands Landscape Assessment (YRD 2005) the Forest Service, in regard to blowdown damage, states: "*Almost half the stands adjacent to previous harvest openings had more than 50 percent canopy damage. Over 90 percent of the most severe damage occurred in stands adjacent to harvest openings and about 87 percent of the least damaged stands were in isolated patches*". Since past management of the USFS has already opened up the Yakutat Foreland Forests to increased blow down intensity, the FS should be responsible for stabilizing the existing unites through research and action.

**5.) Require above grade/overlay on all constructed logging roads. Establish a BMP for temporary road construction that prohibits altering the natural seasonal flow of surface or groundwater.**

Often logging roads are cut below grade resulting in diverted surface and groundwater. Many streams intersect these below grade roads leading to fry dying when the below grade road surface water dries. To avoid this, roads must be planned with annual flooding in mind.

**6.) Require funds generated from sale of timber be set aside for post harvest thinning treatments, silvicultural research, and restoration work.**

When problems arise due to management actions by the Forest Service it should be incumbent that money is set aside for mitigation in a timely manner.

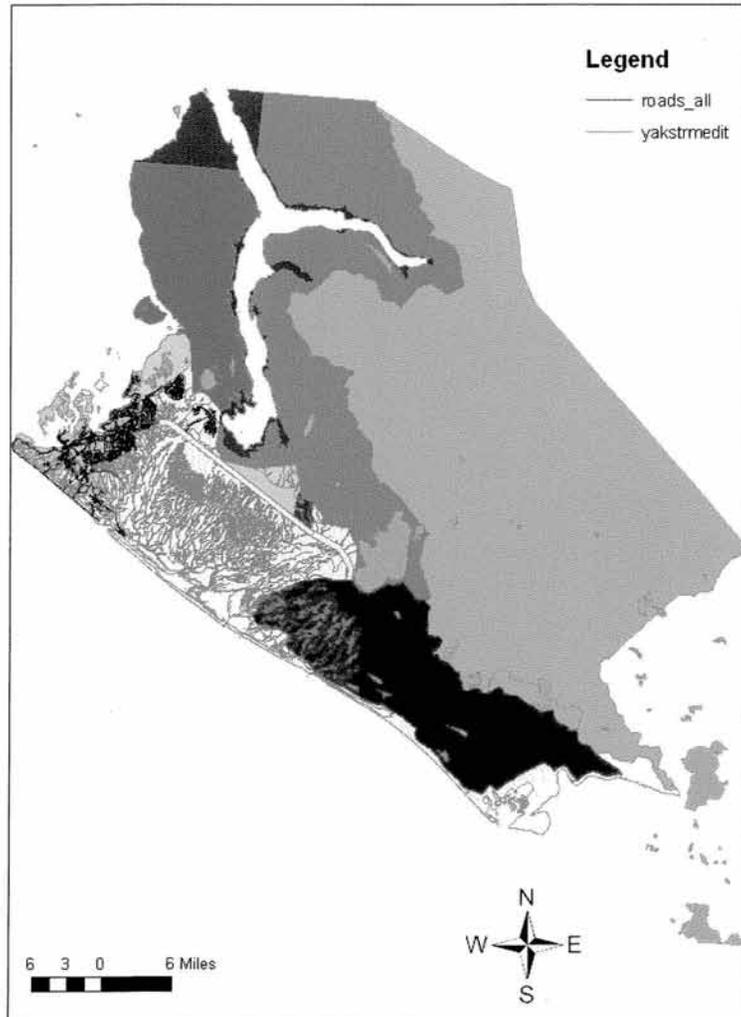
**7.) Increase stream buffers from 200 to 500 feet depending on channel type and width. The 500 foot buffer was suggested in the USFS report entitled Scientific Information and the Tongass Land Management Plan: Key Findings from the scientific literature, species assessment, resource analysis, workshop, and workshop risk assessment panels. (1996)**

The Yakutat Tlingit Tribe would like the lands surrounding Yakutat to be managed to provide fish and wildlife habitat to support our subsistence foods, tourism, and commercial fishing, sustainably harvest and locally-used lumber and firewood without risking significant damage to our forest and habitat, and a healthy forests for future generations.

Sincerely,

Victoria L. Demmert  
 President

### Alternative 2 Modification



H-A85

### City of Coffman Cove Resolution 07-14

A RESOLUTION IN SUPPORT OF ALTERNATIVE 7 OF THE DRAFT LAND RESOURCE MANAGEMENT PLAN FOR THE TONGASS NATIONAL FOREST

WHEREAS, Coffman Cove is located in the Tongass National Forest, and

WHEREAS, the residents of Coffman Cove have an abiding respect for the forest, lakes, rivers and wildlife, and

WHEREAS, the need to have a diversified economy with year round jobs with benefits is essential, and

WHEREAS, the Tongass National Forest can support resource development and recreation while maintaining the integrity of the forest for wildlife and fish habitat, and

WHEREAS, the timber industry should be maintained at a level to provide quality jobs and encouraging development of new markets and industry, and

WHEREAS, a stable timber is essential to maintain a timber industry, and

WHEREAS, at the current level of 300 million board feet the Forest Service is only able to supply less than 60 million board feet of timber per yard due to lawsuits and injunctions, and

WHEREAS, 60 million board feet is not adequate to encourage development or maintain a good job market.

NOW THEREFORE IT BE RESOLVED the City of Coffman Cove supports alternative 7 for the revised Tongass Land Management Plan.

ATTEST:

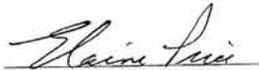
*Sara K. Yockey*  
 Sara Yockey, City Clerk

*Mikael Ashe*  
 Mikael Ashe, Mayor

*Absent*  
 Russ Holbrook, Seat A

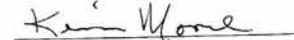
*Willy Johnson*  
 Willy Johnson, Seat B



  
Elaine Price, Seat C

  
Carolyn Duncan, Seat F

  
Randy Wright, Seat D

  
Kevin Moore, Seat G



April 6, 2007

Mr. Forest Cole  
Forest Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901



Dear Mr. Cole:

The City of Craig supports Alternative 7 of the proposed draft Land and Resource Management Plan for the Tongass National Forest. This alternative alone provides a balance of recreational, industrial, environmental, and cultural uses of the forest. Alternative 7 meets this balance by providing 5.9 million acres of wilderness areas, 5.8 million acres of natural setting, 1.7 million acres of moderate development, and 3.4 million acres designated as intensive development.

Prince of Wales Island is an excellent example of how the forest can be managed to accommodate all users. The island supports: the timber, sport fishing, trapping, and tourism industries; recreational users of the forest; a strong commercial fishing industry; facilities that provide clean and renewable hydroelectricity; an extensive public road system; a healthy and flourishing population of terrestrial fauna; municipal watersheds; and other resources. The island also contains approximately 147,000 acres of wilderness, 169,000 acres of LUD II set-aside areas, miles of river corridor reserves, and twelve distinct communities. These wide ranging activities demonstrate the compatibility of many uses within the forest.

The City of Craig believes that one goal of the new TLMP should be to seek a more diverse economy in Southeast through the restoration of a healthy timber industry. In order to accomplish that goal, it is imperative that an adequate, reliable supply of economic saw log-quality timber be provided from the Tongass Forest. Only Alternative #7 approaches the needed annual timber supply needed for the industry.

The Tongass Forest has a biological potential of providing an annual timber harvest of 1.3 billion board feet. Only about 1.5 million acres from the 5.7 million acres of commercial timberland on the Tongass must be managed for multiple-use in order to sustain a 360 million board foot timber supply. Since the 1.5 million multiple-use acres can include most of the existing 2<sup>nd</sup>-growth acreage, about 75% of the Tongass old-growth will be untouched in perpetuity. This modest harvest from the National Forest needs to be clearly pointed out in the FEIS and reflected in the final amended plan.

In addition, based on updated science and a decade of field implementation experience with the 1997 TLMP, the current conservation measures that should be excluded from the final amended plan are:

113

1. The marten and goshawk standards.
2. The 100-foot buffers on each side of all Class III, non-fish streams.
3. The large, medium, and small Habitat Conservation Areas (HCA) and the old-growth reserve strategy.
4. The 1000-foot beach and estuary buffers (reduce to 500-feet, except in 2<sup>nd</sup> growth areas where the buffer would be 100-feet).

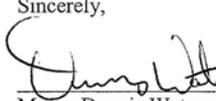
In addition to the above four problematic conservation measures contained in the 1997 plan, the proposed addition of a Legacy Forest Structure guideline in the amendment calling for the retention of old growth timber stand characteristics within all harvest units should be excluded. This requirement would further hamper the economics of timber sales, would create safety hazards during harvest, would leave large trees subject to future wind damage and would increase the costs of sale planning and layout.

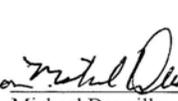
Once the planning is completed and these changes are in place, I would ask the US Forest Service to immediately begin preparing sufficient timber sales to allow for the investment necessary to sustain a fully integrated manufacturing industry.

As you are aware the US Forest Service has worked recently with the Nature Conservancy on what are commonly called restoration projects on Prince of Wales Island. The City of Craig supports these efforts and asks the US Forest Service to continue a program of restoration work here, and if possible continue its cooperative relationship with the Nature Conservancy on these projects.

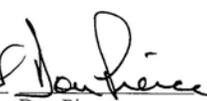
The forest offers many resources to the public. As it decides which forest plan alternative to adopt, the Forest Service should attempt above all else to provide access to all the various resources in the forest. While this approach will likely mean that no one user group gets a development plan that suits its needs only, such a result is not a reasonable expectation for any one group to hold. In the final analysis the Forest Service should adopt the alternative that provides meaningful access to all user groups within the 17 million acre Tongass National Forest, and Alternative 7 meets that test.

Sincerely,

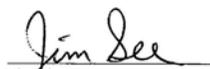
  
Mayor Dennis Watson

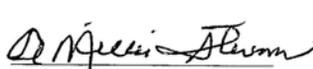
  
Michael Douville  
Craig City Council

  
Greg Hudad  
Craig City Council

  
Don Pierce  
Craig City Council

  
Wanda Rice  
Craig City Council

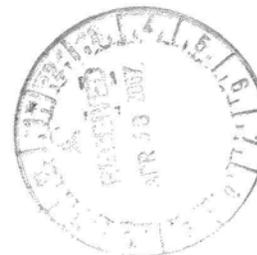
  
Jim See  
Craig City Council

  
A. Millie Stevens  
Craig City Council



**OFFICE OF THE MUNICIPAL CLERK/  
ELECTION OFFICIAL**

155 S. Seward St., Room 202  
Phone: (907)586-5278 Fax: (907)586-4552  
eMail: [Laurie\\_Sica@ci.juneau.ak.us](mailto:Laurie_Sica@ci.juneau.ak.us)  
[www.juneau.org](http://www.juneau.org)



April 26, 2007

Tongass National Forest  
Attn: Forest Plan Adjustment  
648 Mission Street  
Ketchikan, AK 99901

Subject: Draft EIS for the Tongass Forest Plan amendment

Greetings!

The Assembly of the City and Borough of Juneau adopted attached Resolution 2408(b), A Resolution Expressing Assembly Support of the Tongass Futures Roundtable, at its meeting of Wednesday, April 25, 2007.

The resolution expresses the CBJ Assembly's strong support for the forest industry as an important component of the Southeast Alaska Economy. The Assembly commends to the Forest Service the principles adopted by the Tongass Futures Roundtable, and supports the efforts of the Tongass Futures Roundtable to achieve through consensus a "long-term balance of healthy and diverse communities, vibrant economies, responsible use of resources – including timber, while maintaining the natural values and ecological integrity of the forest."

This comment and the attached resolution were e-mailed to:  
[r10\\_tongass\\_juneau\\_rd\\_plan\\_adjustment@fs.fed.us](mailto:r10_tongass_juneau_rd_plan_adjustment@fs.fed.us) on Thursday, April 26, 2007.

Thank you for the opportunity to comment.

Sincerely,

  
Laurie Sica, CMC  
Municipal Clerk  
City and Borough of Juneau, Alaska

H-A87

Presented by: Mayor Botelho  
Introduced: 04/25/2007  
Drafted by: J.W. Hartle

## RESOLUTION OF THE CITY AND BOROUGH OF JUNEAU, ALASKA

Serial No. 2408(b)

### A Resolution Expressing Assembly Support of the Tongass Futures Roundtable.

WHEREAS, Southeastern Alaska provides the setting for the Tongass National Forest, the nation's largest national forest at nearly 17 million acres. A 500 mile long archipelago of fjords, glaciers, ridges, jagged peaks, forests, and wetlands, the Tongass forest comprises much of the largest temperate rainforest remaining on Earth; and

WHEREAS, the Forest Service is an agency of the U.S. Department of Agriculture and manages public lands in national forests and grasslands through management plans; and

WHEREAS, the Forest Service originally adopted the current Tongass Forest Plan in 1997 and it has been amended many times since then; and

WHEREAS, additional adjustments and updates of the Forest Plan (officially called a Forest Plan Amendment) are intended to comply with an August 2005 Ninth Circuit Court of Appeals decision and to respond to the findings of the recently completed Tongass Forest Plan 5 Year Review; and

WHEREAS, the Assembly believes that a diverse economy in Southeast Alaska includes a healthy timber industry; and

WHEREAS, the Assembly has supported efforts of the Tongass Futures Roundtable a diverse group of stakeholders, including members of the forest industry, long involved in the Tongass to discuss how to incorporate Southeast Alaska's economic, cultural and ecological values in public policy issues throughout the region; and

WHEREAS, the Tongass Futures Roundtable has identified the following five principles as areas of significant common interest regarding the Tongass Land Management Plan amendments:

1. Protect intact watersheds with important values;
2. Manage timber lands to provide a steady, reliable, and predictable supply of timber to the industry;

3. Transition from old growth to second growth;
4. Promote, support and fund a forest and riparian restoration program; and
5. Provide sufficient, economic timber to support an integrated manufacturing industry.

NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE CITY AND BOROUGH OF JUNEAU, ALASKA:

**Section 1.** The Assembly of the City and Borough of Juneau expresses its strong support for the forest industry as an important component of the Southeast Alaska economy.

**Section 2.** That the Assembly commends to the Forest Service the principles adopted by the Tongass Futures Roundtable.

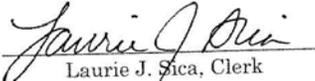
**Section 3.** That the Assembly supports the efforts of the Tongass Futures Roundtable to achieve through consensus a "long-term balance of healthy and diverse communities, vibrant economies, responsible use of resources - including timber, while maintaining the natural values and ecological integrity of the forest."

**Section 4. Effective Date.** This resolution shall be effective immediately upon adoption.

Adopted this 25<sup>th</sup> day of April, 2007.

  
Bruce Botelho, Mayor

Attest:

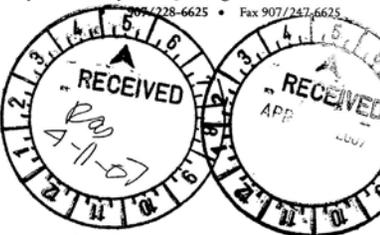
  
Laurie J. Sica, Clerk



## KETCHIKAN GATEWAY BOROUGH

344 FRONT STREET • KETCHIKAN, ALASKA 99901

Office of the Borough Manager, Manager Roy Eckert • roy.eckert@borough.ketchikan.ak.us



April 3, 2007

Mr. Forrest Cole, Forest Supervisor  
USDA Forest Service  
Tongass National Forest  
Federal Building  
Ketchikan, AK 99901

Dear Mr. Cole,

Reference is made to the Tongass Land and Resource Management Plan Amendment DEIS January 2007.

The following are the Ketchikan Gateway Borough's concerns relating to this plan amendment:

As you are aware the Ketchikan Borough experienced a serious loss of yearlong family wage jobs with the closure of the pulp mill and then the veneer plant in Ward Cove. One of the key reasons for these closures was lack of an available timber supply along with market conditions and related business decisions. We have pursued an operator for several years for the veneer plant and we believe the new owners will reopen the veneer plant. They have completed a test run of the veneer plant with positive results. Full production of the mill will require a wood supply from the Tongass National Forest. Absence of an adequate timber supply for the veneer plant and other mills in SE Alaska will be devastating to our already fragile economy, and will result in hundreds of jobs leaving the community.

The Forest Service controls 92.9 % of the land within Tongass National Forest; with only 1% being private lands - with the balance of land being owned by the state, local governments, or native corporations. Clearly only a balanced multiple use management plan for the Tongass National Forest lands will provide for the economic health and well being of SE Alaska communities.

A 2000 report by the McDowell Group stated "Since 1990, volume of timber harvested from the Tongass National Forest has dropped from 470 million board feet to 120 million board feet annually, a 75 percent decline. Timber industry employment is at its lowest point in over 30 years, now directly accounting for only about 670 jobs. At its peak, in the 1970s, the Tongass generated 4,000 timber industry jobs in Southeast Alaska." Further on the report states "Total employment and payroll in Ketchikan are down by 12 percent since 1995. The community has suffered a net decline of 950 jobs and \$30 million in annual payroll. Real payroll (adjusted for inflation) has dropped 16% since 1995."

Since the 2000 report, the timber harvested on the Tongass has declined another 60%. The few remaining sawmills are struggling to secure enough timber to maintain at least a single-shift operation so they can stay in business and maintain some key employees until an adequate timber supply is restored.

In 2000, Congress passed the Secure Rural Schools Act. This Act provided a safety-net of payments in lieu of the boroughs and unorganized areas of Southeast Alaska's share of timber receipts from the <http://www.borough.ketchikan.ak.us>

Tongass. That legislation expired in 2006 and, unless the Act is reauthorized, the boroughs and local governments in Southeast Alaska will again be reliant on the stumpage receipts. At current harvest levels, the loss to Southeast Alaska communities will be about \$9 million per year. This amounts to approximately \$400,000 that the Ketchikan Gateway Borough relies upon to help fund our borough school system. This is in addition to the lost jobs and lost economic activity from the timber sale program. This loss of funding will mean the local governments will need to raise local taxes to provide funding for schools and roads at current service levels.

The Ketchikan Gateway Borough supports the restoration of the timber industry in Southeast Alaska. The industry, the Southeast Conference, the State of Alaska, the Alaska Congressional Delegation and many others envision a fully integrated timber manufacturing industry in Southeast Alaska. The experts agree that about 360 million board feet of economically harvestable timber is the minimum volume that is needed to enable that vision to become a reality. Since alternative #7 in the Draft Environmental Impact Statement for the Tongass Plan Amendment is the only alternative that seems to satisfy that minimum requirement, we recommend that alternative #7, or one that provides a similar timber supply, be adopted in the final forest plan.

We are also concerned about the issue of timber sale economics on the Tongass. Our understanding is that several of the management prescriptions that were developed for the 1997 land management plan are the primary reason that over half of the timber sales prepared in recent years have been uneconomic, in other words, the cost of accessing, harvesting and processing the timber exceeds the value of the products produced. This situation is even more troubling when one recognizes that wood product prices have been at very high levels in recent years.

#### Access and Harvest Costs

Both the timber industry and Forest Service District timber sale planners blame most of the high construction and logging costs on four of the 1997 management prescriptions:

1. Mandatory buffer strips on non-fish streams. The Alaska Forest Practices Act requires 100-foot buffers on each side of all anadromous fish streams and high-value resident fish streams whereas the 1997 land management plan requires the 100-foot buffers on all anadromous and resident fish streams and all Class-3 non-fish streams. The requirement to maintain these 200-foot wide strips on the abundant non-fish streams is terribly costly and of questionable value. We agree with the industry that these non-fish stream buffers should be required on a case by case basis and only when absolutely necessary.
2. 1,000-foot no-cut buffers on all beach fringes. The State Forest Practices Act does not require these buffers and prior to the 1997 plan, only 500-foot buffers were required. Consequently, we support much smaller beach fringe buffers such as called for in alternative #7. Also, since the beach fringe buffers were added for old-growth habitat, we support using a much smaller buffer in existing 2<sup>nd</sup>-growth areas. Managing as much of the existing 2<sup>nd</sup>-growth as possible for timber production will lessen the need to harvest old-growth timber in other areas.
3. The old-growth reserve strategy sets aside about a million acres of large, medium and small tracts of the highest volume, lowest harvest cost timber stands. Too often the remaining timber stands in each area have such low volumes and high harvest cost that they are not operable once the old-growth parcels are removed. The old-growth reserve strategy is unnecessary because only 1.5 million acres of commercial timberland are needed to sustain the 360 million board foot harvest level. That leaves about 4.2 million acres of old-growth timber on commercial

<http://www.borough.ketchikan.ak.us>

4. timberland well distributed across the Tongass. Surely leaving  $\frac{1}{4}$  of the old-growth timber untouched in perpetuity is adequate without the imposition of the old-growth reserve strategy.
5. Marten and Goshawk partial cuts. Requiring partial cutting on cable harvesting units is both dangerous and extremely costly. It is also unnecessary for a region that has more than  $\frac{1}{4}$  of its commercial timberland preserved in an old-growth timber status. Furthermore, the guidelines for protection of these wildlife species are not well founded in science.

The high operating costs associated with the four above guidelines would be further exacerbated if the Legacy Forest Structure guideline as proposed in alternatives #1-6 were adopted. It calls for maintenance of old growth forest structure in all harvest units. Such practices would increase sale design, layout and harvest costs, while creating additional safety hazards. We oppose the inclusion of the above mentioned standards in any of the alternatives.

#### Manufacturing costs

The cost of manufacturing forest products is higher than necessary because the timber supply has been so severely constrained for so long. The few remaining mills cannot make the necessary investments to remain optimally competitive when they are struggling to maintain a single-shift operation. Further, the sawmill operators are compelled to saw many logs that would more appropriately go to a veneer plant, a fiberboard plant or some other type of processing facility. Sawing these unsuitable logs lowers both the productivity in the mills and the value of the lumber that the mills produce. As a consequence the manufacturing cost is higher than necessary.

Many of the Borough's citizens depend upon subsistence of fish and wildlife resources for their families. The Borough does not believe the harvesting and growing of timber under Alternative #7 will be detrimental to the fish and wildlife resources. In fact, we believe species such as deer can and will be more plentiful if Alternative 7 is selected and indeed implemented.

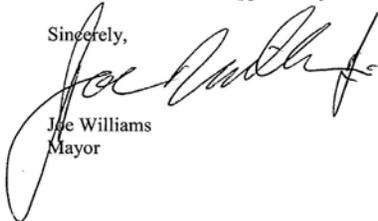
This DEIS is in response to a Ninth Circuit court ruling. Three key issues have been identified: 1) protecting high-value roadless areas, 2) providing a sufficient timber supply to meet market demand and maintain a vibrant economy, 3) protecting wildlife habitat and biodiversity. The Ketchikan Gateway Borough fully believes that Alternative 7 with suggested changes will completely meet and fulfill these key issues.

#### Summary

The Ketchikan Gateway Borough urges you to adopt an alternative like #7 with whatever changes are needed to insure a suitable land base of 1.5 million acres that provides at least 360 million board feet of economic timber sales offered for sale every year. The industry needs a reliable supply of timber and the 360 million board foot operating level can be provided from a small portion of the Tongass.

These comments were approved by vote of the Ketchikan Gateway Borough Assembly on April 2, 2007

Sincerely,



Joe Williams  
Mayor

<http://www.borough.ketchikan.ak.us>

Copy:

Mark Rey  
Department of Agriculture  
Undersecretary for Natural Resources  
1400 Independence Ave. SW  
Stop Code 0108, Wash. DC 20250

Governor Sarah Palin  
PO Box 110001  
Juneau, AK 99811

Senator Ted Stevens  
522 Hart Building  
Washington D.C. 20510

Senator Lisa Murkowski  
709 Hart Building  
Washington D.C. 20510

Congressman Don Young  
2111 Rayburn Building  
Washington D.C. 20515

Dennis Bschor, Regional Forester  
Alaska Region  
PO Box 21628  
Juneau, Alaska 99802-1628

<http://www.borough.ketchikan.ak.us>

RESOLUTION NO. 07-2190



April 10, 2007



Tongass National Forest  
ATTN: Forest Plan Adjustment  
648 Mission Street  
Ketchikan, AK 99901

To Whom It May Concern:

At its regular meeting of April 5, 2007, the Ketchikan City Council unanimously approved Resolution No. 07-2190 supporting a sustainable annual economical timber harvest in Southeast Alaska. This resolution reaffirms the position the City Council has strongly supported for several years: the timber industry is essential to the economic health of Southeast Alaska, and a key component of a healthy and diversified economy in Ketchikan.

The Ketchikan City Council continues to believe that the Tongass National Forest should be managed through the Tongass Land Management Plan and local forest planning efforts. Please consider this resolution as part of the comment record regarding this issue.

Sincerely,

Bob Weinstein  
Mayor

CC: Congressional Delegation  
Governor Sarah Palin  
Senator Bert Stedman  
Representative Kyle Johansen

Weinstein/Forest Service - timber harvest

A RESOLUTION OF THE CITY OF KETCHIKAN, ALASKA SUPPORTING A SUSTAINABLE ANNUAL ECONOMICAL TIMBER HARVEST; RECOGNIZING THE IMPORTANCE OF THE TIMBER INDUSTRY TO SOUTHEAST ALASKA; AND ESTABLISHING AN EFFECTIVE DATE

WHEREAS, the USDA Forest Service is requesting public comment on the Draft Environmental Impact Statement (DEIS) and the proposed Tongass Land Management Plan (TLMP) Amendment; and

WHEREAS, 5.7 million acres of the ten million acre Tongass National Forest are classified as "productive timberland;" and

WHEREAS, approximately 1.5 million acres, inclusive of those areas previously logged, are necessary to sustain a viable economical timber supply in Southeast Alaska; and

WHEREAS, the timber industry in Southeast Alaska has long been a cornerstone of many local economies throughout the region; and

WHEREAS, sustainable timber harvest is consistent and compatible with Ketchikan's interests and goals related to a healthy and diversified economy.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Ketchikan, Alaska as follows:

**Section 1:** The Council of the City of Ketchikan, Alaska expresses support for the public comment process relative to the Draft Environmental Impact Statement (DEIS) and the proposed Tongass Land Management Plan (TLMP) Amendment.

**Section 2:** The Council of the City of Ketchikan affirms that there are approximately 10 million forested acres in the Tongass National Forest and of that, only 5.7 million acres are currently classified as "productive timberland."

**Section 3:** Of the 5.7 million acres that are currently classified as "commercial timberland," the Council of the City of Ketchikan urges the USDA Forest Service approve a Tongass Land Use Management Plan (TLMP) Amendment that makes available 1.5 million productive forested acres, inclusive of those acres previously logged, to sustain a viable economical timber supply in Southeast Alaska.

**Section 4:** The Council of the City of Ketchikan affirms its support of a sustainable economical timber harvest as a component of healthy local and regional economies within Southeast Alaska.

**Section 5:** This resolution shall become effective immediately upon adoption.

H-A91

1132

RESOLUTION #05-1

CITY OF KUPREANOF  
P.O. BOX 50  
PETERSBURG, ALASKA 99833

A RESOLUTION OF THE CITY OF KUPREANOF, ALASKA REQUESTING THAT THE PETERSBURG RANGER DISTRICT, TONGASS NATIONAL FOREST USE A COMBINATION OF WILDERNESS AND REMOTE RECREATION AS THE LAND USE DESIGNATION FOR THE ACQUIRED LAND PARCEL KNOWN AS THE PETERSBURG CREEK LAND ACQUISITION.

April 23, 2007

To: Chris Savage, Acting Petersburg District Manager

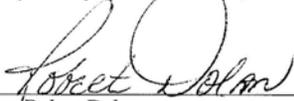
Subject: Forest Plan Revision, Tongass National Forest

Dear Mr. Savage,

Please enter into public comments Resolution #05-1 from the City of Kupreanof regarding Land Use Designations for the acquired land parcel known as the Petersburg Creek Land Acquisition. This property adjoins the City of Kupreanof and the Petersburg Creek Duncan Salt Chuck Wilderness. A copy of this Resolution is attached.

When the Forest Service makes a decision regarding the Forest Plan Revision and the Petersburg Creek Land Use Designation the City of Kupreanof wishes to restate its strong community desire that the "Tongass National Forest use WILDERNESS designation on all lands within the Petersburg Creek water shed and the remaining lands within the Petersburg Land Acquisition be designated as REMOTE RECREATION".

Thank you for your consideration,

  
\_\_\_\_\_  
Mayor, Robert Dolan

RECEIVED  
APR 30 2007  
FOREST SERVICE

WHEREAS, this acquired property is either adjacent to or contained within the City boundaries of the City of Kupreanof and/or borders the Petersburg Creek/Duncan Salt Chuck Wilderness; and

WHEREAS, the entire Petersburg Creek drainage, except these lands, is already designated wilderness; and

WHEREAS, the Kupreanof Policy Plan has a stated goal to "Preserve a roadless community"; and

WHEREAS, the Kupreanof Policy Plan has a policy that states "The City of Kupreanof shall oppose all road construction within its boundaries"; and

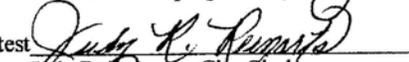
WHEREAS, Remote Recreation and Wilderness designations would best protect the purity of potable water sources for Kupreanof residents; and

WHEREAS, it is contained in the City of Kupreanof City Code of Ordinances, Ordinance 76-2 Section 1, "All motorized land vehicles will be prohibited within city limits except on private property". Remote Recreation designation would best support the City of Kupreanof's use policies and the character of the surrounding lands.

THEREFORE, BE IT RESOLVED THAT THE City of Kupreanof strongly requests that the Petersburg Ranger District, Tongass National Forest use WILDERNESS designation on all lands within the Petersburg Creek water shed and the remaining lands within the Petersburg Creek Land Acquisition be designated as REMOTE RECREATION.

Passed and approved by the duly constituted quorum of the City Council of the City of Kupreanof, Alaska on this 10<sup>th</sup> day of April, 2005.

SIGNED   
Richard E. Sprague, Mayor

Attest   
Judy R. Reinarts, City Clerk

H-A92



City of Pelican

1380  
1380

BOX 737 • PELICAN, ALASKA 99832 • PHONE: 735-2202/2203 • FAX: 735-2258 • E-MAIL: cityhall@pelicancity.net • WEBSITE: www.pelicancity.net

CITY OF PELICAN  
RESOLUTION 2007-7

A RESOLUTION FOR THE CITY OF PELICAN, ALASKA URGING THE UNITED STATES FOREST SERVICE TO MANAGE TONGASS FOREST RESOURCES IN A SUSTAINABLE AND BALANCED MANNER.

WHEREAS, the residents of the community of Pelican, Alaska are heavily dependent on the resources of the Tongass National Forest for our food, health, livelihoods, and lifestyles; and

WHEREAS, Pelican's economy is inextricably linked to the health of the fisheries resource; and

WHEREAS, Pelican residents rely heavily on subsistence foods; and

WHEREAS, road building, according to the Draft Environmental Impact Statement, poses the "greatest risk to fish resources; and

WHEREAS, the projected market demand in all the proposed alternatives greatly exceeds current market demand; and

WHEREAS, the City of Pelican supports small mills and their sustainable and value-added operations in the Tongass; and

WHEREAS, none of the alternatives provided adequately address climate change and global warming issues nor provide for adequate game corridors; and

WHEREAS, it is in Pelican's best interest that old growth watersheds remain intact to provide habitat, subsistence, fishing, hunting, recreation, and tourism opportunities.

NOW, THEREFORE BE IT RESOLVED that the City Council of Pelican, Alaska urges the Forest Service to provide funding for restoration of damaged culverts that block fish passage on existing roads; and

BE IT FURTHER RESOLVED that the Forest Service manage, rehabilitate and offer sales in second-growth forests to meet the needs of small mill operators and set harvest levels consistent with recent market demands; and

BE IT FURTHER RESOLVED that the City Council of Pelican, Alaska urges the Forest Service to manage the forest in a sustainable manner that will provide for varied and healthy ecosystems and an economy that allows sustainable use of subsistence, fisheries, timber, and tourism resources.

PASSED, APPROVED AND ADOPTED THIS 30<sup>th</sup> DAY OF APRIL 2007.

Signed: Patricia Phillips  
Patricia Phillips, Mayor

Attest: Carol Seymour  
Carol Seymour, Assistant Clerk

H-A93





**RESOLUTION 07-02**

WHERE AS the residents of Port Alexander are heavily dependent upon the Tongass Forest for our water, health, livelihoods and lifestyles, and

WHERE AS the days of slash clearcutting have gone the way to be replaced to a large degree by a value added forest products mentality, and

WHERE AS most of these products have evolved into a potential second growth sourced manufacturing process, and

WHERE AS so many of the other industries of the Tongass base, such as fisheries, tourism, fishing and hunting charter operations, personal recreation and scenic majesty have also evolved into a multifaceted shared resource. Therefore,

BE IT RESOLVED the City of Port Alexander would recommend that the Forest Service take steps to finally eliminate the utilization of the old growth forests for the timber industry; that the Forest Service take steps to assist the current level of forest product manufacturers in transitioning from the old growth to the second growth primary resources.

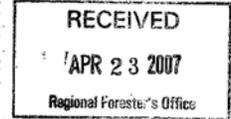
ADOPTED this 16<sup>th</sup> day of April, 2007 at a Port Alexander City council meeting

*Parmica McConnell*  
Parmica McConnell, mayor pro-tem

ATTEST:  
*Linda Lawson*  
Linda Lawson, city clerk

H-A94

RESOLUTION 07-04-17-03  
CITY OF THORNE BAY



A RESOLUTION OF THE CITY COUNCIL FOR THE CITY OF THORNE BAY, ALASKA; SUPPORTING ALTERNATIVE 7 OF THE TONGASS NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN

WHEREAS, the City Council is the governing body for the City of Thorne Bay, Alaska; and

WHEREAS, Alternative 7 of the Tongass National Forest Land and Resource Management Plan provides a balance of recreational, industrial, environmental, and cultural uses of the forest; and

WHEREAS, Alternative 7 meets this balance providing 5.9 million acres of wilderness areas, 5.8 million acres of natural setting, 1.7 million acres of moderate development, and 3.4 million acres designated as intensive development; and

WHEREAS, the Prince of Wales Island supports the timber, sport fishing, trapping, and tourism industries; recreational users of the forest; a strong commercial fishing industry; facilities that provide clean and renewable hydroelectricity; and extensive public road system; a healthy and flourishing population of terrestrial fauna; municipal watersheds; and other resources; and

WHEREAS, Alternative 7 approaches the needed annual timber supply needed for the industry.

NOW, THEREFORE, BE IT RESOLVED the Thorne Bay City Council supports Alternative #7 of the Tongass National Forest Land and Resource Management Plan.

PASSED AND APPROVED April 17, 2007

*James A. Gould*  
Jim Gould, Mayor

ATTEST:  
*Teri Gould*  
Teri Gould, City Clerk/Treasurer





**CITY OF WRANGELL**  
INCORPORATED JUNE 15, 1903

P.O. BOX 531 (907)-874-2381  
Wrangell, AK 99929 FAX (907)-874-3952



April 11, 2007

Forrest Cole  
Forest Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901

RE: City of Wrangell comments on TLMP/DEIS

Dear Supervisor Cole:

The City of Wrangell would like to offer the following comments on the Tongass Land Management Plan Amendment and Draft Environmental Impact Statement.

Wrangell fully supports the restoration of a healthy timber industry to improve the economy of Southeast Alaska and our own community. In order to accomplish this, it is imperative that an adequate, reliable supply of economic timber be provided from the Tongass National Forest.

As you are aware, the City of Wrangell experienced a serious loss of direct yearlong family wage jobs when the mill closed and the subsequent loss of population. Over ten years later, Wrangell is still feeling the decline in the economy due to continued loss of population and the economic staying power to help build businesses and encourage support and service industries. Full production of the Wrangell sawmill will require an economically viable wood supply from the Tongass National Forest. The absence of an adequate timber supply will devastate the large and small mills in SE Alaska and further impact our already fragile economy, resulting in hundreds of additional jobs leaving the region and the less than 75 direct jobs Wrangell has now employed in the timber industry, not to mention other businesses and jobs relying on the employees of the industry for their direct and indirect income.

The US Forest Service controls 92.9% of the land within the Tongass National Forest with only 1% being private lands and the balance of land being owned by state, local governments or native corporations. A balanced *multiple use* management plan for the Tongass National Forest, that includes timber harvesting, can provide economic health and well being for Southeast Communities. It appears that optimistic or unrealistic

assumptions were used previously when defining the ability of the state and private lands to annually supply timber. The vast majority of commercial timberland in southeast Alaska is within the National Forest. Much of the non-federal timberland is now in 2<sup>nd</sup>-growth timber that will not be mature and again commercially harvestable for about another 30-40 years. Thus, the timber supply must come from the Tongass National Forest.

To assure that the Tongass Land Management Plan provides sustained employment for the region, Wrangell offers the following comments:

- The management of the Tongass National Forest must be based on a balanced multiple use plan that provides the employment, goods and services needed by SE Alaska communities both in the short and long term. Economies of SE Alaska must be weighed heavily during consideration.
  - When calculating and analyzing economic impacts, examine the impacts on a community-by-community basis and do not claim that the benefits from a growing community that does not depend on the timber industry somehow offset the negative impacts on communities that do depend on the timber industry.
  - The areas scheduled for harvest should be concentrated in intensive management blocks so that fewer roadless and high value areas will be impacted.
  - Four of the conservation management measures that were developed for the 1997 TLMP are the primary reason that over half of the timber sales prepared in recent years have been uneconomically viable, in other words, the cost of accessing, harvesting and processing the timber exceeds the value of the products produced. This situation is even more troubling when one recognizes that wood product prices have been at very high levels in recent years. Harvests should be designed and managed so that all of the usable wood is taken and used in some form of value-added manner.
1. Mandatory buffer strips on non-fish streams. The Alaska Forest Practices Act requires 100-foot buffers on each side of all anadromous fish streams and high-value resident fish streams whereas the 1997 land management plan requires the 100-foot buffers on all anadromous and resident fish streams **and** all Class-3 non-fish streams. The requirement to maintain these 200-foot wide strips on the abundant non-fish streams is terribly costly and of questionable value. We agree with the industry that these non-fish stream buffers should be required on a case by case basis and only when absolutely necessary.
  2. 1,000-foot no-cut buffers on all beach fringes. The State Forest Practices Act does not require these buffers and prior to the 1997 plan, the buffers were not required. Smaller beach fringe buffers could be possible on a case by case basis. The all encompassing beach fringe buffers were added for old-growth habitat, but smaller buffers in existing 2<sup>nd</sup>-growth areas could be permitted for future sustainable harvest areas. Managing as much of the existing 2<sup>nd</sup>-growth as possible for timber production will lessen the need to harvest old-growth timber in other areas.

3. The old-growth reserve strategy sets aside about a million acres of large, medium and small tracts of the highest volume, lowest harvest cost timber stands. Often the remaining timber stands in each area have such low volumes and high harvest cost that they are not operable once the old-growth parcels are removed. In stead of the old-growth reserve strategy, if the USFS could identify 1.5 million acres of commercial timberland needed to sustain a healthy industry managed for second growth harvesting, that leaves about 4.2 million acres of old-growth timber on commercial timberland that would not be harvested well distributed across the Tongass. Surely leaving ¾ of the old-growth timber untouched in perpetuity is adequate without the imposition of the old-growth reserve strategy.
4. Marten and goshawk partial cuts. Requiring partial cutting on cable harvesting units is both dangerous and extremely costly and would be unnecessary for a region that has more than ¾ of its commercial timberland preserved in an old-growth timber status.

- Establish sale design on the basis of the resources needing protection and otherwise try to maximize production.
- Provide sufficient, economic timber to support an integrated manufacturing industry and do so at an economy of scale that allows the Southeast Alaska timber industry to harvest and process timber competitively with other regions in the world.
- Manage the forest for multiple uses, one of them being timber harvest. Expanding already developed areas, extending existing roads, and staying out of other higher value areas can concentrate harvest to select areas. But some of the standards and guides would need to be relaxed to allow more harvesting in these already developed areas and road extensions. Enough land for a long term sustainable 2<sup>nd</sup> growth forest could be developed.

In summary, the City of Wrangell urges the Forest Service to fairly evaluate all portions of the alternatives and select a preferred alternative that allows an annual harvest level to maintain full employment and use of the existing mills as well as permit job growth and manufacturing growth opportunity in the wood manufacturing component. The City also urges the Forest Service to provide flexibility with the conservation management measures in order to more intensely manage harvest areas for timber harvesting.

Once the planning is completed and these changes are in place, we would like the U.S. Forest Service of the Tongass National Forest to immediately begin preparing sufficient timber sales to allow for the investment necessary to restore a fully integrated timber manufacturing industry and healthy economies.

Sincerely,

*Valery McCandless, serving as Mayor*  
 Valery McCandless, serving as Mayor

*Ronald Rice*  
 Councilmember Ronald Rice

*Paul Southland*  
 Councilmember Paul Southland

*Wilma Stokes*  
 Councilmember Wilma Stokes

*Ernest Christian*  
 Councilmember Ernest Christian

*Tom Sims*  
 Councilmember Tom Sims

*James Stough*  
 Councilmember James Stough

*Robert Prunella*  
 City Manager Robert Prunella

CITY OF WRANGELL, ALASKA

RESOLUTION NO. 04-07-1081

A RESOLUTION OF THE COUNCIL OF THE CITY OF WRANGELL, ALASKA, COMMENTING ON THE TONGASS LAND MANAGEMENT PLAN AMENDMENT AND DRAFT ENVIRONMENTAL IMPACT STATEMENT AND SUPPORTING A SUSTAINABLE TIMBER HARVEST

WHEREAS, the City of Wrangell fully supports the restoration of a healthy timber industry to improve the economy of Southeast Alaska and our own community; and

WHEREAS, the City of Wrangell has continued to see a decline in the local economy due to the loss of jobs directly related to the timber industry and indirectly from the continued loss of support and service industry jobs to the community from the declining population; and

WHEREAS, the Southeast Conference has been analyzing the Draft Environmental Impact Statement (DEIS) and proposed Tongass Land Management Plan (TLMP) Amendment and made initial comments to the US Forest Service; and

WHEREAS, unless the problematic conservation measures are adequately addressed and sufficient acres are dedicated to intensive timber management as SEC recommends, there will not be an adequate, reliable supply of economically harvestable timber available to restore an integrated industry and support the many timber dependent communities in Southeast.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF WRANGELL, ALASKA, is on record supporting the Southeast Conference's comments on the 2007 Tongass Land Management Plan Amendment and Draft Environmental Impact Statement and encourages the U.S. Forest Service to work with communities and Southeast Conference to seek solutions in achieving economic diversification and social well-being of Southeast Alaska by developing a sustainable timber harvest within the Tongass National Forest.

ADOPTED April 10, 2007

*Valery McCandless, serving as Mayor*  
Valery McCandless, Mayor

ATTEST: *Christie L. Jamieson*  
Christie L. Jamieson, City Clerk



CITY & BOROUGH of YAKUTAT  
P.O. Box 160  
Yakutat, Alaska 99689  
Phone (907) 784-3323  
Fax (907) 784-3281

April 25, 2007

To: Tongass National Forest  
Attention: Forest Plan Adjustment  
648 Mission Street  
Ketchikan, AK 99901



The following letter is submitted by the City and Borough of Yakutat Assembly as official public comment regarding the upcoming adjustments to the Tongass Land Management Plan (TLMP). The attached map illustrates the desires of the community of Yakutat regarding land use designations on National Forest within our borough boundaries. This map has been endorsed by the Yakutat Tlingit Tribe, the Yakutat Salmon Board and The Yakutat Planning and Zoning Commission.

We have modified Alternative 2 in regards to Intensive Development, Modified Landscape, Scenic Viewshed and Semi-Remote Recreation Land Use Designations (LUDS).

We have eliminated all intensive development LUD acreage and converted 4,798 acres to modified landscape to allow small timber sales and free-use while encouraging select harvest and small one to two acre "patch cuts". We have reduced the Scenic Viewshed LUD along forest highway 10 to 4,197 acres. The reduction of the Scenic Viewshed LUD is based on its proximity to the Situk River on the Western end of FH10 and the low grade cottonwood/spruce forest on the Eastern end. This alteration will allow for sustainable harvest on 8, 984 acres of National Forest Land.

All remaining lands outside of these designations have been converted to Semi-Remote Recreation LUD. The one exception, which appears to be a FS clerical oversight, is the redesignation of the LUD surrounding Tanis Lake in the Brabazons. This should be redesignated as remote recreation in place of semi remote recreation to match the surrounding LUD. The former timber harvest LUDS redesignated for semi-remote recreation includes the clearcuts along Tawah Creek and the Lost River and the entirety of the federally owned portions of the West Fork Situk, Upper Situk and Old Situk HUC3 Watersheds. Harvest in these watersheds has exceeded sustainable levels. Furthermore, the two major growth industries in Yakutat remain commercial fishing and tourism. We

H-A97

feel that by increasing acreage managed for recreation and subsistence, the USFS will restructure the focus of their budgets by funding tourism infrastructure and planning, and research of fisheries and wildlife resources that community depends on.

Below are specific recommendations for alterations to the TLMP. These comments are made for the geographical area of Yakutat only. However, some of these recommendations may be applicable to the Tongass National Forest as a whole.

Within the Scenic Viewshed and Modified Landscape LUDS we recommend the following changes to TLMP for the Yakutat Ranger District:

**1.) Support 200 year rotation with precommercial and commercial thinning at logical intervals when needed.**

Conversations with local sawmill owners indicate that 200 years is a minimum time span for harvested units to begin producing saw log quality trees.

**2.) Support selected harvest and small 1-2 acre "patch cuts"**

This style of harvest is possible in Yakutat due to the flat topography. Small patch cuts do not open the forest canopy as readily to the wind as does large clear cutting methods. Selected harvest, when done correctly, provides for continuing forest function and remains useful for wildlife, watershed health and the public

**3.) Support annual small sale program to meet community needs and create small timber base for value added wood industry (wood toys, instrument wood, molding, beams, etc.)**

A community survey conducted in 2005 indicated that 61% of the community is in favor of a small sales program. Only 17% of the community was opposed to this level of logging.

**4.) Require research into windthrow patterns for use in harvest planning**

On page 3-33 of the West Forelands Landscape Assessment (YRD 2005) the Forest Service, in regard to blowdown damage, states: "Almost half the stands adjacent to previous harvest openings had more than 50 percent canopy damage. Over 90 percent of the most severe damage occurred in stands adjacent to harvest openings and about 87 percent of the least damaged stands were in isolated patches". Since past management of the USFS has already opened up the Yakutat Foreland Forests to increased blow down intensity, the FS should be responsible for stabilizing the existing unites through research and action.

**5.) Require all logging roads be constructed above grade. Establish a BMP for temporary road construction that prohibits altering the natural seasonal flow of surface or groundwater.**

The attached photos illustrate how roads divert surface and groundwater. To avoid this, roads must be planned with annual flooding in mind.

**6.) Require funds generated from sale of timber be set aside for post harvest thinning treatments, silvicultural research, and restoration work.**

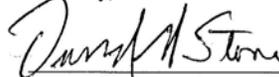
When problems arise due to management actions by the FS it should be incumbent that money is set aside for mitigation in a timely manner.

**7.) Increase stream buffers from 200 to 500 feet depending on channel type and width. The 500 foot buffer was suggested in the USFS report entitled Scientific Information and the Tongass Land Management Plan: Key Findings from the scientific literature, species assessment, resource analysis, workshop, and workshop risk assessment panels. (1996)**

The attached photo shows a riparian buffer failure off the end of a USFS 2000 acre clearcut. This buffer was 300 feet wide.

What the majority of Yakutat Residents want is to have, in essence, a community woodlot that is managed sustainably and at low intensity. We want the timber lands managed so that they can be used by all residents for lumber and firewood, provide habitat for wildlife and fish, a place to hunt and trap, and a landscape that shows visitors good stewardship practices. The rest of the non-timber National Forest land is presently providing well managed commercial fishing, guiding, and subsistence opportunities for Yakutat's citizens and the public of the United States. We commend this management and encourage the Forest Service to focus on these activities as the planning team rewrites TLMP.

Sincerely,



Dave Stone, Mayor



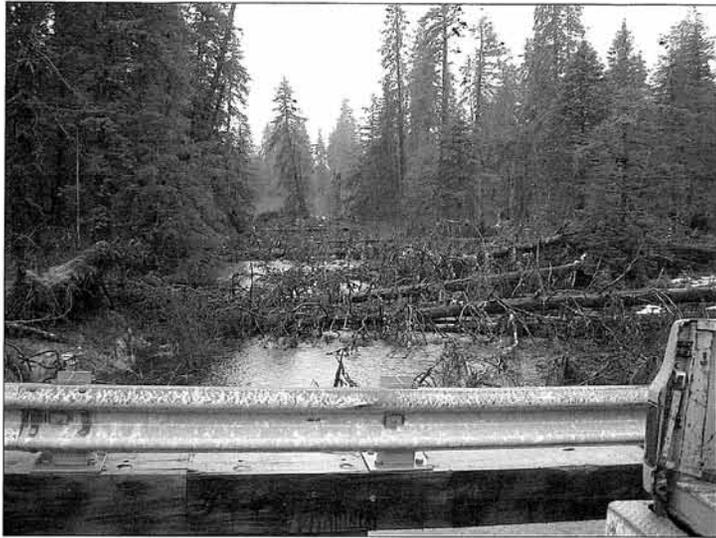
February 2005 Yakutat Salvage Sale II Road



May 2004 – blowdown harvest road on private land adjacent to National Forest

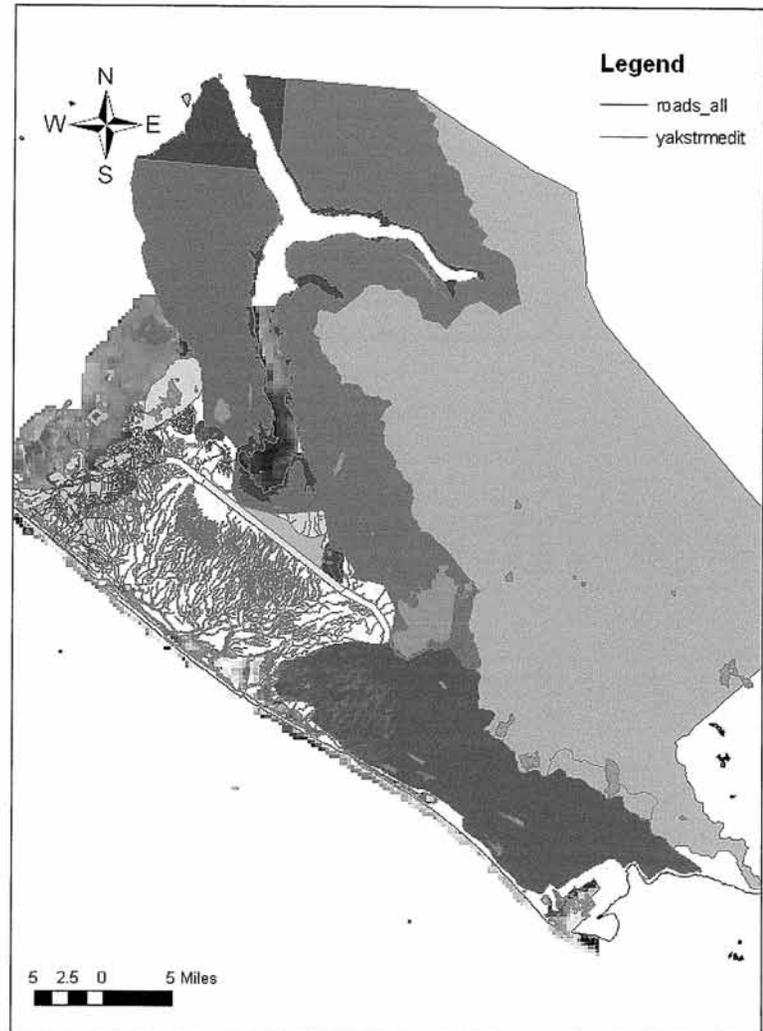


First logging road constructed for Yakutat Salvage Sale 1 (2004)



Upper Riparian Buffer failure on the West Fork of the Situk River Buffer failure extends for several hundred yards downstream (2005)

### Alternative 2 Modification



## Land Use Designations

### WILDERNESS AND NATIONAL MONUMENT

-  Wilderness and Wilderness National Monument- Preserve essentially unmodified areas to provide opportunities for solitude and primitive recreation. Limit motorized access.
-  Non-Wilderness National Monument - Facilitate the development of mineral resources in a manner compatible with the National Monument purposes.

### MOSTLY NATURAL SETTING

-  LUD II - Maintain the wildland characteristics of these congressionally-designated unroaded areas. Permit fish and wildlife improvements and primitive recreation facilities.
-  Old-Growth Habitat - Maintain old-growth forests in a natural or near-natural condition for wildlife and fish habitat.
-  Research Natural Area - Manage areas for research and education and/or to maintain natural diversity on National Forest System Lands.
-  Semi-Remote Recreation - Provide for recreation and tourism in natural-appearing settings where opportunities for solitude and self-reliance are moderate to high.
-  Remote Recreation - Provide for recreation in remote natural settings outside Wilderness, where opportunities for solitude and self-reliance are high.
-  Municipal Watershed - Manage municipal watersheds to meet State water quality standards for domestic water supply.
-  Special Interest Area - Preserve areas with unique archaeological, historical, scenic, geological, botanical, or zoological values.
-  Wild, Scenic, or Recreational River - Maintain and enhance the outstandingly remarkable values of river segments which qualify the river to be classified as a Wild, Scenic, or Recreational River.

### MODERATE DEVELOPMENT

-  Scenic Viewshed - Maintain scenic quality in areas viewed from popular land and marine travel routes and recreation areas, while permitting timber harvest.
-  Modified Landscape - Provide for natural-appearing landscapes while allowing timber harvest.
-  Experimental Forest - Provide opportunities for forest practices research and demonstration.

### INTENSIVE DEVELOPMENT

-  Timber Production - Manage the area for industrial wood production. Promote conditions favorable for the timber resource and for maximum long-term timber production.
-  Minerals - Encourage mineral exploration and development of areas with high mineral potential.



CRAIG COMMUNITY ASSOCIATION

P.O. Box 828  
Craig, Alaska 99921  
Phone: 907-826-5125  
Fax: 907-826-3997  
Email: whalehouse@hotmail.com

Date: 4 April 2007  
To: USFS  
From: Craig Community Association  
Environmental Protection Division  
Re: Tongass Land Management  
Plan (TLMP) Comment

Greetings U.S. Forest Service,

Thank you for your time. Craig Community Association is a federally recognized Tribe; with 672 qualified and enrolled Tribal members.

This letter is in regards to the comment that is requested for the Tongass Land Management Plan (TLMP). As a federally recognized Tribe, we support "Alternative 1".

"Alternative 1" takes a lot of economic stress that our forest might not be able to handle anymore. The 20<sup>th</sup> Century was "The easy way out". In the end, our lands are paying for our mistakes. We must protect and preserve our precious forest. Keeping our logging to a minimum is crucial to the survival of the 21<sup>st</sup> Century. Southeast Alaska is nothing without our forest.

Alternative 1 will provide a mix of National Forest uses and activities, but would give much additional emphasis to maintaining inventoried roadless areas, associated fish and wildlife values, and unroaded recreation, tourism, and subsistence opportunities, relative to the current Forest Plan. Timber would be managed primarily within the roaded land base and the vast majority of inventoried roadless areas would remain in a natural condition. A total of 1.2 million acres of the Tongass would be in Development LUDs and 15.6 million acres would be in Non-development LUDs.

The 21<sup>st</sup> Century is full of opportunity- capitalize. We need to get our 20<sup>th</sup> Century thought and applications out of the stream and start to apply 21<sup>st</sup> Century consequences with our future actions. We must not make the same mistake again.

The data presented in your EIS shows a decline in the amount of timber being harvested within the TNF; as well as an increase in recreational and subsistence activities. The data presented should be considered in making your decision. We are suggesting that recreation, subsistence and "sacred sites" be put in the front, and set timber sales to a gradual halt.

We understand that up to 450 employees in Southeast Alaska depend on the timber industry (5%). Please take into consideration how many other employees that can be implemented to a National Forest that supports recreation, tourism, and subsistence; not to mention how much wildlife will be enhanced (62% natural resource based). More employees will benefit this "New Horizon", with the interagency protection of our "Sacred Sites".

More areas of great concern are the protection of our subsistence rights, and the conservation and monitoring of our "sacred sites" that are located within the TNF. Sacred Sites are valuable to indigenous people of the TNF. These areas should be protected and monitored under Tribal/USFS interagency supervision. These sacred areas need special attention and will require sensitive monitoring from both governmental agencies. This action will provide balance- a much needed ingredient in today's economy.

Tourism has spiked since the 1990's and will continue to grow. Tourists will not travel to come and see a land that "Once thrived". Tourists are eager to see the true meaning of "The Last Frontier".

Our environment- this is the largest concern in our Draft EIS for the Tongass Land Management Plan. With the increase in the Industrial Age and in global population, a lot of weight is being put on natural resources. Once again, balance is the key ingredient missing in this recipe.

The introduction of noxious or invasive animal and plant species in our forests is drawing more concern with each new initiation. They present no natural predators to control this silent outbreak. Interagency attack is an effective "first-step" to remediation. The Forest Service and Tribes must work together.

Global climate change has scientific based proof that Alaska's overall temperature is increasing faster than any area in the world. Our trees and plants have the balancing effect to help neutralize such worldwide events from happening. We must protect our future today.

We thank you for your time and consideration.

Respectfully,

\_\_\_\_\_  
Dennis Nickerson  
Environmental Coordinator  
Craig Community Association

\_\_\_\_\_  
Date

### PRINCE OF WALES COMMUNITY ADVISORY COUNCIL

Chairman: Jon Bolling, Craig  
Vice Chairman: Art King, Naukati  
Secretary/  
Treasurer: Elaine Price, Coffman Cove

PO Box 725  
Craig, AK 99921  
(907) 826-3275  
(907) 828-3380  
FAX: (907) 826-3278

April 17, 2007

Mr. Forest Cole  
Forest Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901



Dear Mr. Cole:

The Prince of Wales Community Advisory Council supports Alternative 7 of the proposed draft Land and Resource Management Plan for the Tongass National Forest. This alternative alone provides a balance of recreational, industrial, environmental, and cultural uses of the forest. Alternative 7 meets this balance by providing 5.9 million acres of wilderness areas, 5.8 million acres of natural setting, 1.7 million acres of moderate development, and 3.4 million acres designated as intensive development.

POWCAC is an association of communities on Prince of Wales Island (POW) dedicated to improving the quality of life on Prince of Wales. POWCAC achieves this goal by acting in an advisory capacity to State and Federal agencies concerning issues that affect Prince of Wales communities.

Prince of Wales Island is an excellent example of how the forest can be managed to accommodate all users. The island supports: the timber, sport fishing, trapping, and tourism industries; recreational users of the forest; a strong commercial fishing industry; facilities that provide clean and renewable hydroelectricity; an extensive public road system; a healthy and flourishing population of terrestrial fauna; municipal watersheds; and other resources. The island also contains approximately 147,000 acres of wilderness, 169,000 acres of LUD II set-aside areas, miles of river corridor reserves, and twelve distinct communities. These wide ranging activities demonstrate the compatibility of many uses within the forest.

POWCAC believes that one goal of the new TLMP should be to seek a more diverse economy in Southeast through the restoration of a healthy timber industry. In order to accomplish that goal, it is imperative that an adequate, reliable supply of economic timber be provided from the Tongass Forest. Only Alternative #7 approaches the needed annual timber supply needed for the industry.

PARTICIPATING COMMUNITIES:  
Coffman Cove, Craig, Hollis, Hydaburg, Kasaan, Klawock, Naukati, Thorne Bay, Whale Pass

H-A102

The Tongass Forest has a biological potential of providing an annual timber harvest of 1.3 billion board feet. Only about 1.5 million acres from the 5.7 million acres of commercial timberland on the Tongass must be managed for multiple-use in order to sustain a 360 million board foot timber supply. Since the 1.5 million multiple-use acres can include most of the existing second growth acreage, about 75% of the Tongass old growth will be untouched in perpetuity. This modest harvest from the National Forest needs to be clearly pointed out in the FEIS and reflected in the final amended plan.

In addition, based on updated science and a decade of field implementation experience with the 1997 TLMP, the current conservation measures that should be excluded from the final amended plan are:

1. The marten and goshawk standards.
2. The 100-foot buffers on each side of all Class III, non-fish streams.
3. The large, medium, and small Habitat Conservation Areas (HCA) and the old growth reserve strategy.
4. The 1000-foot beach and estuary buffers (reduce to 500-feet, except in 2<sup>nd</sup> growth areas where the buffer would be 100-feet).

In addition to the above four problematic conservation measures contained in the 1997 plan, the proposed addition of a Legacy Forest Structure guideline in the amendment calling for the retention of old growth timber stand characteristics within all harvest units should be excluded. This requirement would further hamper the economics of timber sales, would create safety hazards during harvest, would leave large trees subject to future wind damage and would increase the costs of sale planning and layout.

Once the planning is completed and these changes are in place, the US Forest Service should begin immediately preparing sufficient timber sales to allow for the investment necessary to sustain a fully integrated manufacturing industry.

As you are aware the US Forest Service has recently worked with the Nature Conservancy on what are commonly called restoration projects on Prince of Wales Island. POWCAC supports these efforts and asks the US Forest Service to continue a program of restoration work here, and if possible continue its cooperative relationship with the Nature Conservancy on these projects.

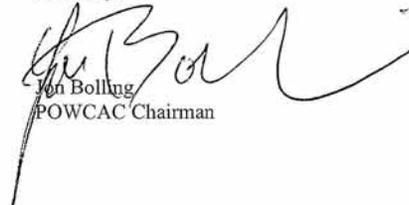
The forest offers many resources to the public. As it decides which forest plan alternative to adopt, the Forest Service should attempt above all else to provide access to all the various resources in the forest. While this approach will likely mean that no one user group gets a development plan that suits its needs only, such a result is not a reasonable expectation for any one group to hold. In the final analysis the Forest Service should adopt the alternative that provides meaningful access to all user groups within the 17 million acre Tongass National Forest. Alternative 7 meets that test.

PARTICIPATING COMMUNITIES:

Coffman Cove, Craig, Hollis, Hydraburg, Kasaan, Klawock, Naukati, Thorne Bay, Whale Pass

Thank you for considering our comments.

Sincerely,



Jon Bolling  
POWCAC Chairman

PARTICIPATING COMMUNITIES:

Coffman Cove, Craig, Hollis, Hydraburg, Kasaan, Klawock, Naukati, Thorne Bay, Whale Pass

999 ✓



**Southeast Alaska Regional  
Advisory Council**

**Bertrand Adams Sr., Chair**

P. O. Box 349  
Yakutat, AK 99689  
907 784 3357  
kadashan@ptialaska.net

April 27, 2007



U.S.D.A Forest Service, Region 10  
P.O. Box 21628  
709 W. 9<sup>th</sup> Street  
Juneau, Alaska, 99802-1628

Dear sirs,

The Southeast Regional Advisory Council (SERAC) met in Kake, Feb. 26 through Mar. 1, 2007. SERAC represents all southeast subsistence communities including Yakutat. The Council is authorized by the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act to provide recommendations to the Federal Subsistence Board concerning regulatory and land management actions that may affect subsistence uses of fish and wildlife. ANILCA and the charter also recognizes the Council's authority to "initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife on public lands within the region" and to "provide a forum for the expression of opinions and recommendations.....(on) any matter related to the subsistence uses of fish and wildlife on public lands within the region." Our 13 Council members come from 11 Southeast Alaska communities. They are very well informed concerning the effects of timber management in the region. The Council provided comments on the Tongass Land Management Plan Revision on Nov. 11, 1997 (appended); many of our comments at made at that time remain valid today.

At our recent meeting, Council members reviewed the Tongass Land and Resources Management Plan Amendment, Draft Environmental Impact Statement (DEIS). The Council wishes to acknowledge the attention paid to the review of this plan by Council members Bangs, Hawkins, Hernandez, and Wallace. The following are the Council review comments. Overall, the Council is concerned that the DEIS does not adequately recognize the importance of the subsistence use taking place in the Tongass National Forest, that it does not provide sufficient protections for this use, and that it does not provide enough information to evaluate the foreseeable effects of proposed timber

management, increased levels of tourism and non-subsistence consumptive use, and of global warming on subsistence uses.

1. **Purpose and need.** The Council questions the treatment of the DEIS of market demand. While the Tongass Timber Reform Act may direct Forest Service to meet market demand, Forest Service may have interpreted "market demand" incorrectly. The best indicator of market demand is current and past harvest levels actually achieved. Over the past decade, actual harvests from Federal public land have generally been under 100 mmbf per year. This recent recorded harvest provides an accurate metric for "market demand." The Council believes that the DEIS should use this figure or a slightly higher figure allowing for incremental growth of existing harvesting businesses as the basis for market demand.

The Council strongly objects to setting market demand to meet the possible demand from industries or businesses that may one day choose to operate in Southeast Alaska. We do not believe that Forest Service needs to meet the fictional demand of businesses that exist only as ideas or proposals. Should viable industrial plans to use Tongass NF timber come close to implementation in the future, the plan may be amended to accommodate these new uses.

2. **A Revision or an Amendment?** The Council is unclear why Forest Service has chosen to undertake an amendment rather than a plan revision. We believe that the ecological situation on the Tongass NF has changed sufficiently, human uses and demands put on the forest have changed, global warming is upon us, and that new management perspectives have emerged since the plan was first approved. This argues for a full plan revision and not an amendment. The main changes we note are:

- a. Virtual collapse of the large scale industrial timber industry in the region. Presently, small producers are the main timber harvesters. Note that the Council supports these local Alaskan business endeavors.
- b. Tourism has grown exponentially since the plan was approved. The charter fishing industry is part of this growth and impacts subsistence directly.
- c. Management perspectives identifying the critical need to restore and rehabilitate clear cut areas of the Tongass NF have come to the fore.
- d. The consensus from scientific and Traditional Ecological Knowledge is that the Tongass NF is being and will be profoundly affected by climate change. This effect on the forest and on subsistence uses needs to be fully evaluated in a new forest plan.

3. **Subsistence land use designation.** The Council continues to be concerned about the lack of an appropriate land designation for subsistence. In 1997 we wrote, "Although the Plan included 19 land use designations for purposes such as logging, recreation, research, and municipal watersheds, it included no

H-A104

designations to protect the most important subsistence use areas of rural communities.” To the extent that the DEIS considers subsistence at all, it looks at the effect of other uses on subsistence. We believe that subsistence is a prime use of Tongass NF natural resources and that it should be designated as such. The DEIS must plan **FOR** subsistence rather than merely see the effect of plan activities upon subsistence uses.

4. **Subsistence studies.** The original TLMP identified the need to conduct periodic harvest assessments and other studies of subsistence to provide the data needed by management and to assess whether ANILCA Sec. 810 protections were insuring a continuance of subsistence uses. The Council notes that this provision appears to have been dropped from the DEIS.

The Council believes that periodic assessment of subsistence harvests and other documentation of subsistence characteristics needs to take place. Projects conducted through the Federal Subsistence Program have led to development of tribal and community capacity to successfully undertake management studies of this type.

5. **Conservation strategy.** Council members reviewed the joint statement of peer review committee members concerning the adequacy of conservation measures proposed for wildlife in the DEIS. The Council agrees with the conclusions that:
- a. The habitat reserves identified are inadequate to provide for viability of wildlife species on the Tongass NF.
  - b. There is not enough connectivity between old growth reserves. Key areas for connectivity are:
    - i. Cleveland Peninsula
    - ii. Bay of Pillars-Port Camden-Three mile arm to Tebenkof Wilderness area on Kuiu Island
    - iii. Whale Pass and Honker Divide on Prince of Wales Island
    - iv. Hoonah Sound-Port Frederick-Tenakee Inlet on Chichagof Island
    - v. Portage Bay-Duncan Salt Chuck on Kupreanof Island.
  - c. There is too much fragmentation of wildlife habitat.
  - d. In areas where there are wolves, fragmentation results in increased wolf predation and increased pressure on deer.
6. **Viability as a standard.** The DEIS emphasizes species viability and distribution as a standard that needs to be met. In the Council’s view mere viability is not an appropriate standard. Subsistence users need to be able to harvest the wildlife and fish they need for subsistence within their normal community hunting and fishing areas, generally those areas where they have recognized customary and traditional use of the species in question. A better standard would be “sustainable and normally distributed” if this were taken to mean that fish and wildlife populations would be maintained in sufficient abundance and in locations where subsistence

harvests may take place.

7. **Habitat rehabilitation and restoration (R&R).** Some restoration and rehabilitation projects aimed at recovering the original biological productivity of clear cut areas have been begun on Prince of Wales Island. The DEIS needs to greatly expand the scale and scope of R&R to address all clear cut and second growth areas on the Tongass NF. The stewardship responsibility of the Forest Service for areas that have had active timber management includes planning to restore areas to their natural condition.
8. **Impacts on fish and fisheries.** The Council believes that the DEIS inadequately reviews the impact on the region’s fish populations and fisheries. Is it really plausible that there is *no effect* anywhere from the aggressive timber harvesting program pursued on public lands over that past 30 years? The Council would like more thorough discussion of effects on stream flow, stream temperature, transport of nutrients and feed from headwaters to fish rearing habitat, and the influence of large wood and beaver dams on fish productivity.
- The Council is concerned that known problems with culverts obstructing fish passage, with siltation from forest roads, and with detritus at log transfer facilities are not competently addressed. We need to know when and how these problems will be remedied.
- Steelhead should be listed as a species of concern .
9. **Competition for resources.** The DEIS needs to address the effects of competition on subsistence uses. Increased road building for timber production would lead to more competition for fish and wildlife resources. Trout and steelhead are particularly vulnerable to over exploitation when there is road access to streams. Subsistence use areas on Gravina Island, Prince of Wales island, Kupreanof island, Wrangell island, Mitkof island, Baranof island, and Chichagof island all have ferry access, making them prone to competition from non subsistence hunters and fishers.
- An increase in timber production would require more logging camps in remote areas. This would greatly increase competition in some presently used subsistence areas.
10. **Climate change.** The DEIS needs a much fuller discussion of climate change and how the DEIS will respond to our best prediction of what lies ahead. Climate change and it's effects on the health of the forest ecosystem essential to wildlife and fish habitat is of great concern to the Council. The Council believes that maintaining diversity of forest flora is very important in a changing climate. Large scale changes to the landscape as a result of intensive logging minimizes diversity. Climate change as stated in the draft report will result in more severe weather which will cause more blowdowns, landslides, and siltation, impacting

streams. Summers could also be hotter and drier. Resulting insect infestation leading to loss of forest could effect stream temperatures. Cedar decline as a result of climate change is also resulting in loss of tree cover for winter range and stream shading.

11. **Maintenance of cultural practices.** In addition to cultural values mentioned in the draft report, the Council also believes that maintaining remote areas where subsistence activities take place is important. A certain amount of solitude is a valuable aspect of the subsistence way of life.
12. **Community assessments.** The council disagrees with the draft plan's blanket conclusion that there will be no impacts to subsistence fisheries for any communities in the Tongass forest. The Council notes that the community assessments do list many impacts to subsistence deer hunting. Given the importance to the rural economy of subsistence hunting, we think impacts on subsistence should be heavily weighted when deciding on an alternative.
13. **ANILCA Sec. 810.** Most or all of the alternatives proposed "may significantly restrict subsistence uses." The DEIS needs to show the relative level of impact from the different alternatives proposed. The alternatives directing large timber harvests have decidedly greater restrictions on subsistence uses than alternatives that direct less calamitously large harvests. Timber harvests in areas documented to be particularly important to subsistence users will have more effect than timber harvests that are less productive for subsistence harvesters.

The Council understands that, "No withdrawal, reservation, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency--:

- 1) Gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to section 805;
- 2) Gives notice of, and holds, a hearing in the vicinity of the area involved; and
- 3) Determines that (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands; (B) the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions.

The Council is primarily concerned with 3) above. We do not believe that the DEIS has demonstrated that the restrictions on subsistence uses that would occur from timber harvest levels above those of the past 10 years is "necessary" as intended in Sec. 810. Such excessive harvest would not be consistent with sound management of the Tongass NF. Further, the Council is not convinced that the

DEIS has demonstrated that the proposed actions would involve the minimum amount of land necessary. The DEIS also has not demonstrated specifically how adverse impacts to subsistence uses and resources would be minimized.

Please address any questions with this letter either directly to me or through Dr. Robert Schroeder, Subsistence Management Coordinator, U. S. Forest Service, Alaska Region, Box 21628, Juneau, AK 99802-1628, 1 800 586 7895, fax 907 586 7860, [rschroeder@fs.fed.us](mailto:rschroeder@fs.fed.us).

Sincerely,

/S/

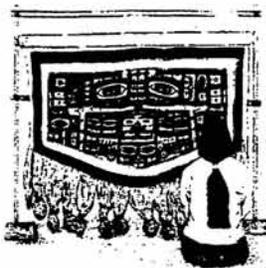
Bertrand Adams Sr.  
SERAC Chair

cc. Council Members:

Michael Bangs, Petersburg	Nick Davis, Kake	Mike Douville, Craig	
Merle Hawkins, Ketchikan	Donald Hernandez, Pt. Baker/Petersburg		
Joe Hotch, Klukwan	Floyd Kookesh, Angoon	Harvey Kitka, Sitka	Patricia
Phillips, Pelican	Dick Stokes, Wrangell	Lee Wallace, Saxman	
Frank Wright Jr., Hoonah			

Denny Bschor, Regional Forester, USDA Forest Service  
Steve Kessler, USDA Forest Service  
Dr. Winifred Kessler, WFEW, USDA Forest Service  
Pete Probasco, Office of Subsistence Management  
Don Rivard, OSM, Division Chief, FWS

H-A106



**SOUTHEAST ALASKA FEDERAL  
SUBSISTENCE  
REGIONAL ADVISORY COUNCIL**

c/o Subsistence Program  
Box 21628  
Juneau, Alaska 99802-1628

Voice: 1-800-586-7895, or 907-586-8890  
FAX: 907-586-7860

Dr. Michael P. Dornbeck, Chief of the Forest Service  
USDA Forest Service  
PO Box 96090  
Washington, DC 20090-6090

11/17/97

Dear Chief Dornbeck;

The Southeast Alaska Federal Subsistence Regional Advisory Council (the Council) is a FACA chartered committee that has responsibility under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) to make recommendations concerning issues and actions that may impact subsistence uses of wild renewable resources in the Region. The Council is comprised of citizens from across the Region, both Native and non-Native people selected for their extensive experience and knowledge concerning subsistence and non-subsistence resources and their uses. The members are appointed jointly by the Secretaries of the Interior and Agriculture.

At their recent public meeting in Yakutat (September 30 - October 2, 1997), the Council considered many issues, including the potential impacts of the Tongass Land Management Plan (TLMP). The Council is concerned about the reduction of subsistence opportunities that will occur as a result of the TLMP and unanimously passed a motion to write this letter in support of the Appeal to TLMP submitted to you by five Federally recognized Tribes in Southeast Alaska.

Five major Tlingit Indian Tribes of Southeast Alaska appealed the Revision of the TLMP, arguing that the Plan fails to protect customary and traditional uses of wild fish and game resources for subsistence purposes, as required by section 810 of ANILCA. The appellants are the federally recognized Indian Tribes from the four largest primarily Tlingit villages in the region: Hoonah, Angoon, Kake, and Klawock. The fifth appellant is the Tribal government for Sitka, the largest community in Southeast Alaska defined as "rural" under Title VIII of ANILCA. The Tribes make the following points in their appeal:

- Customary and Traditional uses of fish and game retain vital importance to these villages. Economically, they provide a substantial portion of the villages' food supply. Even more importantly, however, traditional harvest of wild fish and game is the foundation of Native culture.

- Clearcut logging of Tongass old growth harms subsistence uses primarily by destroying essential winter deer habitat. The Forest Service admits that implementation of the Plan will significantly restrict subsistence uses of deer. The agency projects that the areas of the Forest most heavily used for subsistence by rural communities will lose up to half of their deer habitat capability.
- This restriction to subsistence uses is not "necessary," as required by ANILCA section 810. There are no legal or contractual requirements that compel the Forest Service to take actions that restrict subsistence uses.
- The Forest Service illegally concluded that clearcut logging approved as part of a general "multiple use" balancing process justified any restrictions to subsistence uses. Congress enacted ANILCA section 810 specifically because the agencies were not adequately protecting subsistence uses under existing authorities such as "multiple use." Congress intended heightened protection for subsistence uses, not reduced opportunity.
- Although the Plan included 19 land use designations for purposes such as logging, recreation, research, and municipal watersheds, it included no designations to protect the most important subsistence use areas of rural communities.
- None of the standards and guidelines in the Plan provide meaningful protection for subsistence uses, but rather place a priority on timber production. The agency dropped the only standard that could have protected deer habitat in the most heavily use subsistence areas, falsely claiming that it would be "difficult to administer."

The Southeast Alaska Federal Subsistence Regional Advisory Council agrees with the Tribes' points outlined above and offers this letter in support of their appeal.

Sincerely,

*Mim McConnell for William C. Thomas*

Chairman **William C. Thomas**, Ketchikan

and the other Council members:

**John Vale, Yakutat**      **Mary Rudolph, Hoonah**  
**Gabriel George, Angoon**      **Patricia Phillips, Pelican**  
**Herman Kitka, Sitka**      **Mim McConnell, Auke Bay**  
**John Feller, Wrangell**      **Lonnie Anderson, Kake**

**Marilyn Wilson, Haines**  
**Jeff Nickerson, Klawock**  
**Vicki LeCornu, Hydaburg**  
**Dolly Garza, Sitka**

cc Tom Waldo, Earthjustice Legal Defense Fund  
Michael Jude Pate, Sitka Tribe of Alaska

H-A107



Yakutat Salmon Board  
 City & Borough of Yakutat  
 P.O. Box 160  
 Yakutat, Alaska 99689

Phone 907-784-3329  
 Fax 907-784-3281



30 April, 2007

To: Tongass National Forest

Re: TLMP Adjustments

This letter is submitted on behalf of the Yakutat Salmon Board. The Yakutat Salmon Board is an advisory committee to the City and Borough of Yakutat. These comments are only reflective of Yakutat Salmon Board staff and should not be construed as City & Borough of Yakutat comments except when referenced.

We have a lot of experience with the timber aspect of TLMP in Yakutat. Over 1 billion board feet have been exported from East Yakutat. In addition, all economical timber in West Yakutat has been harvested and the timber operations are leaving this year. Given that Sitka Spruce Forests grow slowly in the North Tongass it is likely that we won't see large scale timber production in our borough for at least another 100 years. In 1903 large tracts of land were harvested for railroad, fish plant and housing construction. The regrowth of this 104 year old forest averages around 10-12 inch dbh which is unsuitable for saw log production. Our community is in favor of small sales. The proposed map includes all small sale units proposed by the Yakutat District.

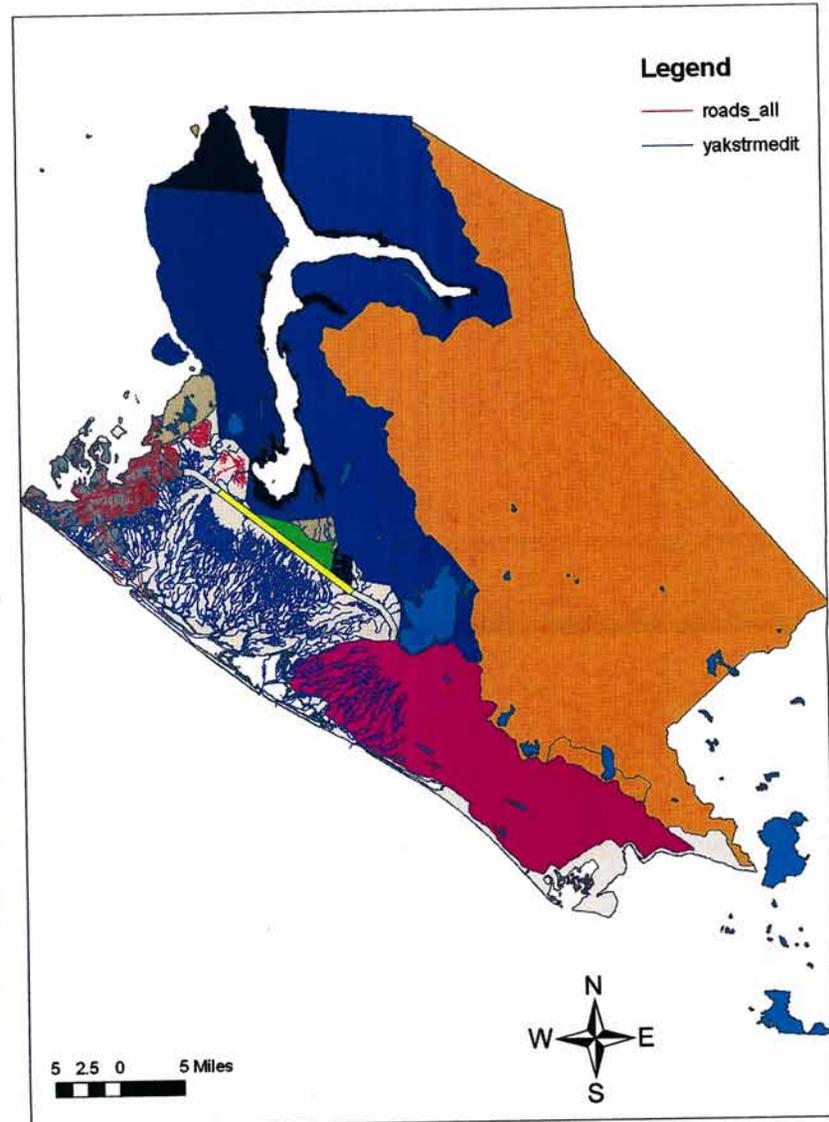
Our community relies on recreation and commercial fishing for the bulk of its economy. I feel the proposed land use changes illustrated by the enclosed map reflect the economic reality of our town. I also believe that non-local U.S. citizens using the Tongass in Yakutat would agree that fishing, hunting and wildlife viewing is the best use of this public land. If there is a demonstrated need to prove this we can apply for survey money to statistically back this claim.

I strongly encourage the USFS to accept our proposed modifications to alternative 2, which were passed unanimously by the Yakutat Tlingit Tribal Council, The Yakutat Salmon Board, The Yakutat Planning and Zoning Commission and the City and Borough of Yakutat Assembly. I would like to see an increase in spending for Fisheries, Wildlife and Recreation projects on the district.

Sincerely,

  
 Bill Lucey  
 Director, Yakutat Salmon Board

## Alternative 2 Modification



# Yakutat Community Opinion Survey

*An Analysis of Planning and  
Development Issues in Yakutat*

H-A109

prepared for the  
**City and Borough of Yakutat**  
P.O. Box 160  
Yakutat, Alaska 99869

prepared by  
Sheinberg Associates  
204 N. Franklin St, Ste 1  
Juneau, Alaska 99801  
[bsheinberg@sci.net](mailto:bsheinberg@sci.net)

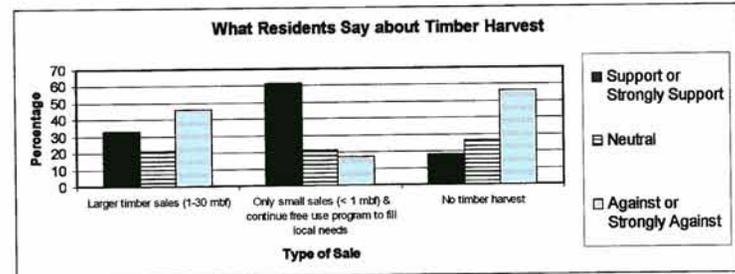
October 2005

## 9.0 Timber

Residents were asked how much they supported future timber harvest activities in Yakutat, which could occur on Forest Service, State, or Borough lands or a combination.

This question generated some controversy because the question told residents to assume that all timber harvest could stimulate local value added production and local jobs, that timber harvest would meet State and Federal environmental regulations, and that it could be designed to attempt to stabilize stands from future wind throw. Some suggested this wording was misleading because in their judgment it is the inability of timber sales to achieve these matters that has led to recent controversy and legal action. Residents answered the question as it was written and results indicate:

- Just under two-third (61%) of residents support or strongly support small timber sales.
- 18% support no timber harvesting while over half (56%) do not agree with this option.
- Just under half (46%) are against large timber sales, while one-third (33%) support them.
- 21-26% are neutral on all timber harvest options.



	Net support	Strongly support	Support	Neutral	Against	Strongly against	Net against
Larger timber sales (1- 30 million board feet).	33%	15%	18%	21%	18%	28%	46%
Only small sales (less than 1 million board feet) and continuation of the free use program to fill local needs.	61%	23%	38%	21%	5%	12%	17%
No timber harvest at all.	18%	11%	7%	26%	26%	30%	56%



**Printed on Recycled Paper**

Photograph taken looking northeast with Lindenberg Peninsula on Kupreanof Island and the mouth of Petersburg Creek (front cover) in the foreground, Petersburg Mountain (front cover) in the middleground, and Frederick Sound and the mainland in the background.