

**December 17, 2019**

**Attn: Alaska Roadless Rule  
USDA Forest Service  
P.O. Box 21628  
Juneau, Alaska 99802**



To the Alaska Roadless Rule Planning Team,

We are a small-scale, family-owned and operated fisheries business based in Pelican, a small fishing village located on the rugged shores of Chichagof Island in Southeast Alaska. Our business, Yakobi Fisheries, buys premium quality salmon from a select few local fishermen in Pelican. Our dream is to provide Americans with affordable, fresh, wild salmon that is harvested from our pristine seas. We take immense pride in our product and our transparent supply chain, and assure that every customer can trace the product they buy back to the boat it was caught on. We recognize that the viability of our business depends on the productivity of the Tongass National Forest and the productive salmon habitat it contains in its watersheds. Thus, we are compelled to relay our concerns about the Alaska Roadless Rule process and the proposed full exemption alternative that we understand is being pushed by our elected representatives.

We are invested in the smart, sustainable stewardship of the resources, lands, and waters that sustain our industry and the people of Southeast Alaska. Our Alaskan salmon are a renewable resource that provide us with food and jobs from year to year. The future of our industry, our lifestyle, our ability to feed our families and the American people, all depends upon the salmon populations that are supported by the clean water and healthy, intact fish habitat of the Tongass. Having grown up in Pelican and fishing these waters for over twenty years, I can attest to the importance of maintaining productive, cool spawning habitat for the continuity of the runs that we depend on.

We are currently in the midst of a four year drought in one of the world's largest coastal temperate rainforests. Local precipitation levels have been dangerously low, as streambeds run dry and salmon pool up outside the entrances of rivers, waiting to return home and spawn. We have seen news of salmon dying of heatstroke while they lie in wait, unspawned egg sacs still in their bellies. 2019 has been named the 'International Year of the Salmon', and what should be a year of celebration and recognition of our incredibly valuable resource has instead been one of low returns, disastrous news, and wariness and doubt about the future of our fish. This year in particular has been characterized by reports of salmon dying in massive numbers as high water temperatures, drought, climate change, and increased development initiatives take their toll on populations throughout Alaska and along the entire West Coast.

We do not support the actions of Governor Dunleavy and President Trump to open up the Tongass National Forest to a full exemption from the 2001 Roadless Rule. We view this as an attack on healthy, productive salmon habitat and all the livelihoods that this habitat supports -

from fishermen to seafood processors, to maritime industry workers and the inhabitants of Southeast Alaska that depend on this fish to fill their freezers year after year.

Commercial fishing is the economic backbone of Southeast Alaska. The salmon habitat and productive watersheds of the Tongass National Forest are the backbone of the commercial fishing industry. Rising temperatures and ocean conditions present us with management concerns and more questions than answers - but we believe at least one of the answers to these problems is in the trees. Old growth forests, such as those found in many roadless areas on the Tongass, are critical to the future of our salmon. These areas contain large, centuries-old trees that provide an extensive canopy creating shade and cooling the streams from the sun; providing respite for spawning salmon from increasing temperatures. Once they die, the trees fall into the river, creating small pools and eddies that these salmon to lay their eggs in. Insects feed on the nutrients provided by the dead trees, and in turn are consumed by the juvenile salmon that spend the first part of their lives in this freshwater habitat. In return, the salmon provide valuable nutrients to the trees as their bodies are returned to the soil by the bears, wolves, and eagles that distribute their carcasses amongst the forest floor.

We hope that a small look into this intricate web of life illuminates why the health of this habitat and this forest is so critical to the future of the commercial fishing industry in Southeast Alaska. Increasing economic opportunity is indeed a challenge for this region - and we recognize that every job is important. We also would like to point out that one in ten jobs in Southeast is in the seafood industry, and we contribute 10% of all regional employment earnings. According to a McDowell report on the Economic Value of the Alaskan Seafood Industry (2013), these percentages equate to direct employment of 13,500 individuals and an estimated \$321 million in labor income in the Southeast region alone. A full-scale exemption from the 2001 Roadless Rule will endanger these economic contributions and the thousands of small businesses like ours that strive to make a living off the fish that return to the Tongass every year.

We live in a unique place. The town of Pelican is almost entirely surrounded by the West Chichagof-Yakobi Island Wilderness area. Most of the Southeast region is made up of public lands managed by the U.S. Forest Service. This means that we depend on our delegation in Washington D.C. to fairly represent the interests of our industry, as well as all the others that make a living from this forest. However, in this process we are seeing the interests of a few remaining mills outweigh the contributions of the entire seafood industry, as the push to open up the forest to industrial-scale clearcutting shows. We have lived through the timber era and are now endeavoring to find a way forward that creates income for our small communities without having such an outsized impact on the land.

Processing seafood is our job, but the salmon that we work with constitute our way of life. Salmon create jobs, provide us with food security, contribute to our social and cultural wellbeing, and are the basis of life here in Southeast Alaska. Thus, we urge you to select an alternative in the Alaska Roadless Rulemaking process that broadly protects fish habitat,

continues the phase-out of industrial scale old growth clear-cutting, and prioritizes the restoration of degraded watersheds and streams. We believe the best alternative here is no action. The 2001 Roadless Rule is working for us by allowing responsible development while protecting our remaining intact watersheds for fish and wildlife production. Thank you for your consideration.

Sincerely,

Seth and Anna Stewart  
Owners, Yakobi Fisheries LLC