

PUBLIC TESTIMONY BY BOB SCHROEDER
PRESENTED AT THE
JUNEAU COMMUNITY ROADLESS RULE PUBLIC MEETING
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BOB SCHROEDER: Thank you so much for being here and supporting protection of the Tongass. My name is Bob Schroeder, S-C-H-R-O-E-D-E-R. I live in zip code 99801. My Tlingit name is Chakeen. I'm Takdeintaan, Raven's Nest House from Hoonah.

I'm also a SEACC board member, and I sit on the Southeast Regional Advisory Council for subsistence. Much of my career has been working on the subsistence issue, and that's what I'll focus my comments on this evening.

Basically, the DEIS is extremely disrespectful to indigenous people. The DEIS, for those of you who have looked through it, includes an extremely thin depiction or acknowledgment of tribes, traditional territory, or culture. It also does not describe subsistence uses of the Tongass National Forest in any great detail.

And for those of you who may not be familiar with that literature, it's really deep. The Forest Service itself has spent easily \$1 million in documenting subsistence uses in the Tongass National Forest, which includes estimates of harvest levels of fish and wildlife in all the subsistence communities in the region, mapping of subsistence use territories, and mapping of Kwaan and clan territories.

This is a very serious NEPA failing, a National Environmental Policy Act failing, in that what a NEPA document is supposed to do is tell you what you know about the land or the territory that's under review.

I've had the occasion to be at a number of so-called subsistence hearings and have spoken to some of my colleagues who have been at others of these hearings. To say that the hearings held in communities have been overwhelmingly in favor of the No-Action Alternative doesn't do it justice. I mean, there's not a single person who shows up saying, "What we really need in Hoonah, what we really need in Angoon, what we really need in Kake are a lot more roads." Nobody is saying this. And these are people who have also had their experience with logging and logging on Native corporation land and also need jobs to survive. So this response has been really overwhelming in keeping the roadless rule as it is.

I'd like to speak a little bit about the technicalities of the evaluation of subsistence, because this is kind of a special law. Subsistence is protected by the Alaska National Interest Land Conservation Act, Section 8. And under Section 810 -- this gets a little wonky. Excuse me. Section 810 directs Federal agencies as to what they're supposed to do if they're doing a land use action that may significantly restrict subsistence uses.

Now, those are kind of weird terms. What does that mean? That means that if you're going to do something on the land, on federal land, that looks like it may have an effect on subsistence uses, you have to analyze that and come to a determination of significant restriction, or they used to call it FONSI. I don't know if anyone can guess what that means. That's a Finding Of No Significant Impact. So this is all in Forest Service procedures as to how you approach a plan that is a land use action.

In this particular plan, the DEIS for changing the roadless rule really doesn't do this, so it does not analyze subsistence data. It doesn't present subsistence data, and it does not come up with a finding, as required by Forest Service procedures, of significant or no significant impact.

The reason why that's so important is that in Forest Service procedures, subsistence hearings can only be held after you do this step. And that's kind of logical, because if you were doing something and there was no significant impact, you don't need to have hearings, because there isn't any significant impact. But if you do, you go and have hearings to decide whether or not this is real, whether the analysis was correct, and you want to hear from people in that case.

The hearings that were held throughout Southeast Alaska were fatally flawed, because they did not present any finding that people could respond to. And in that respect, they completely violate the Forest Service's own procedure and a clear and obvious reading of ANILCA Section 810, which is the governing law in this case.

So for these reasons, I believe that the DEIS is fatally flawed and will need to be completely redone before it can be considered just on the subsistence grounds.

The next thing that happens after you have hearings is that the deciding officer -- in this case, that would be Secretary Perdue -- would need to -- if they decide to go ahead with an action, would need to decide that this is somehow necessary. And that's a pretty steep jump, because we have all the people in our regions saying that, "Boy, we really don't want this at all." And so to come out with a finding that it was necessary to do so after holding a bunch of hearings where people say, "Boy, we don't want any change to this law at all" would be a real steep step.

Let's see what else I have here.

I think the DEIS needs to be completely withdrawn. We need to show respect for indigenous cultures. We will point out that Native people have been caretakers of the land on which we walk for thousands of years, and that it's basically the failed fossil capitalism that has us in the fix that we're in, both in the Tongass and with respect to the climate emergency that we face.

Everyone here appears to support the No-Action Alternative, and I support a modified No-Action Alternative. And the reason it needs to be modified is that the inventory of roadless areas is incorrect and it omitted a number of areas, specifically approximately 150,000 acres of forest land that was not roaded but had already been designated for harvest under the pulp company contracts. And so that land still had not been roaded, but it does not appear in the roadless inventory.

Secondly, I believe that since we're going through this exercise at great public expense and calling on a great involvement of people of Southeast Alaska, that I really think that we shouldn't just settle for the existing roadless rule, but we need to, as I said, include the areas that were erroneously omitted from the roadless inventory.

And I think we should examine whether or not, once an area has a road, does that mean that it endlessly is a roaded area? If something had a road put in it in 1975 and nothing has happened there, maybe that's a roadless area as well. I think we need a lot more than the current roadless inventory to be covered by the roadless rule.

That's my testimony. Thank you.

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