

Hydaburg Cooperative Association



December 15, 2019

USDA - USFS Regional Office
ATTN: Regional Forester, Dave Schmid
P.O. Box 21628
Juneau, AK 99801-1807

Alaska Roadless Rule
USDA Forest Service, Alaska Region
Ecosystem Planning and Budget Staff
P.O. Box 21628
Juneau, AK 99802-1628

Dear Mr. Schmid and Alaska Roadless Rule Team,

The Hydaburg Cooperative Association (HCA) is a federally recognized Tribe on Prince of Wales Island in Southeast, Alaska. The Tribal government was formed in 1938 under the Indian Reorganization Act, and currently represents 479 Tribally enrolled members. The community of Hydaburg was established in 1911, when the United States government consolidated the three Haida villages of Howkan on Long Island, Sukkwan on Sukkwan Island, and Klinkwan near Hunter's Bay. The city of Hydaburg became incorporated in 1927. While the exact timing of when the Kaigani Haida migrated from Haida Gwaii (formerly Queen Charlotte Island) to Prince of Wales Island is unknown, it is generally thought to have occurred in the 18th century (Langdon and Sanderson, 2009) and most assuredly before President Theodore Roosevelt designated the Tongass National Forest in 1907.

On February 5th, 2019, HCA signed a Memorandum of Understanding with the United States Department of Agriculture, Forest Service (USDA Forest Service) in accordance with 40 CFR Section 1501.6 and 1508.5, and was established as a Cooperating Agency in the preparation of analysis and documentation under the National Environmental Policy Act (NEPA). On February 28, 2019, as a Cooperating Agency, HCA made comments on the Preliminary Draft Environmental Impact Statement (PDEIS) (Attachment

1). At that time, HCA showed some support for Alternative 3 (prior to the addition of the Community Priority Alaska Roadless Area (ARA)), but requested additional protections on specific high priority watersheds important to the community that were not included a Watershed Priority in the PDEIS as they were previously left out of the TNC/Audubon Conservation Priority Areas and Tongass 77 Watershed protections list. HCA expressed that if the protections to their high priority watersheds could not be incorporated into Alternative 3, then their support for an Alaska Roadless Rule Alternative would be more conservative. Unfortunately, none of the comments in HCA's comment letter (Attachment 1) as a cooperating agency were incorporated or taken into consideration in the October 15, 2019 release of the Alaska Roadless Rule Draft EIS (DEIS).

Between the PDEIS and the DEIS, the USDA Forest Service as the lead agency broke their trust with HCA as a Cooperating Agency. Suggestions for how to improve the analysis were not taken into consideration and community use area maps were not adjusted. Further, the spirit of compromise was abandoned when the U.S. Forest Service unilaterally decided to designate the full exemption alternative (Alternative 6) as the Preferred Alternative in the DEIS. Therefore, HCA prefers to make these current comments as a federally recognized Tribe, a sovereign nation in which the USDA Forest Service has a trust responsibility.

1. Traditional Territory of K'iis Xaadas (Hydaburg Haida)

As defined in Langdon and Sanderson (2009), "*K'iis Xaadas traditional territory extends minimally from Cape Chacon at the southern end of Prince of Wales Island west to Cape Muzon encompassing all of Dall Island and Forrester Island offshore, and passing north through Meares Passage separating Dall Island from Suemez Island to the vicinity of Waterfall then following a line to the middle of Prince of Wales Island and south to Cape Chacon*". Figure 1 (Attachment 2) was extracted from Langdon and Sanderson (2009), which should be the territory that the Alaska Roadless Rule DEIS uses in both Appendix E pages E-32 to E-34 and Appendix F pages F-1 and F-2. Table E-12 of the DEIS should reflect the corrected traditional territory. HCA understands that this area may be smaller than the "Community Use Area" currently defined in the DEIS, however the K'iis Xaadas traditional territory is more widely recognized and is still the currently recognized traditional use area for Hydaburg.

As previously explained in HCA's February 28, 2019 letter, watersheds that have been identified as the most important to Hydaburg include the following: Hetta Lake, Eek Lake, Nutkwa Inlet, Keete Inlet, Hunter's Bay, Manhattan Lake (on Dall Island) and the whole of Sukkwan Island. These areas encompass culturally and traditionally important sockeye salmon systems (in addition to other locations), as identified by Langdon and Sanderson (2009). In many areas within these watersheds, the 2001 Roadless Rule are the only protections that apply. Further, the TNC/Audubon Conservation Priority Areas and Tongass 77 Watershed lists do not add any additional protections, if the Watershed Priority is applied, as these watersheds were not included on those lists. This subject will continue to be of great concern to HCA, until an alternative that includes continued protections to these watersheds is developed. A primary example, but not the only example, is Sukkwan Island. Sukkwan Island hosts two important sockeye salmon systems, important habitat for other salmon species, important hunting and trapping areas, and numerous cultural sites. Landownership on the island is predominantly USDA Forest Service Lands. Hydaburg supported the Sealaska Land Bill in 2014, because it included LUD II designations for

Eek Lake and Sukkwan Island. However, much of the west side of the island is NOT designated LUD II and the only protections it current has is the 2001 Roadless Rule.

2. Effects of timber harvest and road building in the K'iis Xaadas traditional territory and subsistence resources

The K'iis Xaadas have an intimate knowledge of the land in which they occupy. The subsistence economy for residents of Hydaburg is strong, and the reliance upon fishing, hunting and gathering takes an understanding of the available habitat and environment throughout the territory. This traditional knowledge is not incorporated at any level in the DEIS. Appendix F is included in the DEIS, and includes a one page (page F-1) description and a reproduced copy of the Goldschmidt and Haas (1998) map (page F-2). While traditional territories are mentioned once in the DEIS (page 3-219) it is unclear why Sections it could have been acknowledged and integrated into were Environmental Justice

There may be short term benefits for improved or increased access to subsistence resources but not without the adverse impact from competition of resources. In addition, roads across the landscape have a greater probability of impacting undocumented sacred sites and cultural sites. The subsistence analysis in the DEIS is inadequate.

The DEIS does an inadequate job of analyzing the effects of roadbuilding on subsistence resources (pages 2-217 to 2-228). The DEIS states *"The analysis of the likely effects of the DEIS alternatives on subsistence resources and uses is presented in two parts. Effects on subsistence resources and uses important to each rural community are discussed individually by community in Appendix E"* (page 3-223). In Appendix E, Subsistence is discussed on page E-15 and does not discuss any individual community. Individual Community Assessments start on the bottom of page E-15 and do not discuss impacts to subsistence (although there is mention of customary and traditional use for the alternatives with a Timber Priority).

Back on page 3-223, the second part of the subsistence analysis *"provides a Forest-wide evaluation that assesses the three factors related to subsistence uses identified by ANILCA"* (page 3-223). The analysis relies heavily on the 1997 Forest Plan Revision FEIS, because *"The 2016 Forest Plan EIS found that the possibility of a significant restriction, resulting from a change in abundance or distribution, would be less than the possibility under the 1997 Forest Plan or 2008 Forest Plan for all the alternatives considered..."* (page 3-224). The rest of the Alaska Roadless Rule DEIS analysis for subsistence seems to rely on the 1997 Forest Plan Revision FEIS, for "abundance and distribution", "access", "competition" and "cumulative effects". HCA believe this does not take into consideration that the data used for the 1997 Forest Plan Revision FEIS was 22 years ago. While the analysis for the 1997 Forest Plan came out more conservative than the 2016 Forest Plan, this does not mean using any analysis for other Plans is appropriate. For both parts of the subsistence analysis sections (Chapter 3 and Appendix E), HCA recommends using current data (for instance Hydaburg's harvest data taken and reported by the State of Alaska was updated in 2012).

On November 12, 2019 a public meeting and ANILCA Section 810 subsistence hearing were held in Hydaburg. Thirteen residents were in attendance and eight people testified in the Section 810 ANILCA subsistence hearing. The primary points of these testimonies included:

- Road building creates subsequent issues with stream sedimentation, which is adverse for fish species on which residents rely.
- Stream buffers of 100 feet are inadequate, as the region is subject to windthrow. The 100 foot buffer offers less protection for important fish species. Adequate buffers would be ½ mile.
- With the loss of protections like the Coastal Management Plan, the only protections left for fish come from protections by the U.S. Forest Service on fish habitat.
- Timber harvest reduces intact deer habitat, through stem exclusion stage.
- The timber industry brings loggers to Prince of Wales that harvest resources (legally and illegally), especially deer, and take away these important subsistence resources from residents.
- Hydaburg residents access all of Prince of Wales and surrounding islands for subsistence, and are therefore not just concerned about impacts to these resources around the Hydaburg community use areas.
- The subsistence economy is not just about food, it includes customary trade and is an economy residents are entitled to.
- Cultural and sacred site locations are known and that knowledge is proprietary and not readily available to the public.
- ANILCA allows for a subsistence priority and should be a higher priority in the EIS than sport fishing and/or personal use. This priority should be applied to over 40 species that Hydaburg residents rely on.
- The U.S. Forest Service is not taking into consideration the full cumulative impacts of timber harvest across land owners, including past and current timber harvest on corporation and mental health lands.

A final point is that the Alaska Roadless Rule DEIS fails to make an appropriate ANILCA Section 810 Finding. In their December 12, 2019 comment letter on the Alaska Roadless Rule, the Southeast Alaska Subsistence Regional Advisory Council's (SE RAC) bullet point #9 (pages 12-15) lays out the case where the DEIS does not follow the ANILCA Section 810 requirements. HCA wholeheartedly agrees with the argument the SE RAC makes. The Region 10 Forest Service Handbook (FSH) provides their Subsistence Management and Uses Handbook as FSH 2090.23, and Chapter 10 outlines the process for making an ANILCA Section 810, which includes an EVALUATION, a FINDING, NOTICE and HEARINGS, and finally a DETERMINATION. Because the FINDING was not made in the DEIS, the subsequent NOTICE and HEARINGS were out of order and therefore prevents the USDA Forest Service making a legal Section 810 Determination for Subsistence.

3. Effects on Fish and Fish Habitat

Fish, and in particular salmon, are the most important species to the K'iis Xaadas. The K'iis Xaadas, like many coastal indigenous people are salmon people. Salmon provide cultural identity, spirituality, and way of life that is still strong in present day. In addition to this long standing cultural connection, in more recent times salmon have provided economic value through commercial fisheries and they continue to contribute to cultural and traditional use lifestyles and a subsistence economy. Salmon should be discussed in the context of both "Key Issue #2 – Support local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors" and "Key Issue #3 – Conserve terrestrial habitat, aquatic habitat, and biological diversity".

HCA appreciates the more detailed analysis the DEIS gives for fish, where impacts to fish are determined by the indirect effects of the proposed action on fish habitat. Summarizing the alternatives separately within the section was useful. However, as fish habitat relates back to the two Key Issues mentioned above is not apparent. Further, Table 2-11 includes the comparison of alternatives broken out by the Key Issues, but does not summarize or compare how different alternatives impact fish as a function of fish habitat.

Given how important salmon and salmon habitat is to indigenous communities, the analysis would benefit from a closer look at where timber harvest could occur with respect to anadromous fish streams. Table 1 was provided by The Nature Conservancy and identifies by alternative how many miles of anadromous salmon streams are protected from roadbuilding and old growth logging by the Roadless Rule or LUD II status. Under Alternative 6, the number of anadromous salmon stream miles that would be exposed to roadbuilding activities significantly decreases from the number of miles that are protected under the current 2001 Roadless Rule (Alternative 1).

Table 1. Salmon stream protection, by Alternative (showing proportion of total AWC salmon stream miles on USDA Forest Service land protected from roadbuilding and old growth logging by Roadless or LUD II status (table provided by The Nature Conservancy).

	Salmon stream miles protected as roadless (% of total land on USDA Forest Service)
Alternative 1	2,561 mi. (49%)
Alternative 2	2,540 mi. (48%)
Alternative 3	2,410 mi. (46%)
Alternative 4	2,255 mi. (43%)
Alternative 5	1,915 mi. (37%)
Alternative 6*	590 mi. (11%)

*Values in this row are exclusively for 870,000 acres of LUD II.

The DEIS states “*Alternative 1: This alternative would have the lowest potential harvestable acres, the lowest number of new and rebuilt roads constructed, and likely the lowest number of new and reconstructed stream crossings of any alternative. However, these numbers are not substantially different than the other alternatives*” (page 3-115). The analysis does not define what a substantial difference would be, and what factors configure into the threshold for that analysis. For Alternative 6 the DEIS states “*While a potential slight increase in roads and potential harvest areas with associated effects to streams could occur, with the current project harvest remaining unchanged, harvest and road building in these areas would only occur, with minor exceptions, with an associated reduction in roads and harvest in other areas. Thus, there would be similar effects to fish and their habitat, though possibly in different areas, as under Alternative 1*” (page 3-116). Again, as discussed in the above paragraph, the analysis of effects needs to look at where roadbuilding would likely occur in relation to suitable timber and how that overlays with anadromous fish streams. The above statement acknowledges that Alternative 6 would affect fish and their habitat but stating “*though possibly in different areas, as under Alternative 1*”.

The cumulative effects analysis does not include either the Prince of Wales Landscape Level Assessment or the Central Tongass Landscape Level Assessment. Further, there is no discussion on the current status of inadequate fish passage on the Tongass National Forest. The current estimate is that there are 1,250 inventoried culvert crossings on anadromous fish streams across the Tongass National Forest. Of those, 187 are considered red pipes that do not provide adequate passage for anadromous fish. Using an average cost of \$77,500 for the replacement of these structure (not including potential stream restoration costs outside of the road corridor), the USDA Forest Service will need to expend approximately \$14.5 million. HCA believes new road building has the potential to compound the fish passage issue on Prince of Wales Island when the effects of these past actions, potential effects from POW LAA, and potential effects of the preferred alternative of the Alaska Roadless Rule are considered cumulatively.

4. Effects on Deer and Deer Habitat

Sitka black-tailed deer are the most important land mammal species for traditional and customary use by indigenous peoples of Prince of Wales Island. Typically for an EIS, the USDA Forest Service conducts a Biological Evaluation for proposed projects and the effects analysis for Sitka Black-tailed Deer includes assessing the stability of deer populations as a function of deer habitat. The removal of lower elevation productive old growth (POG) forest habitats is a key factor in determining the effects of an action on the species. The Alaska Roadless Rule DEIS primarily uses analyses conducted in the 2016 Forest Plan Final Environmental Impact Statement (FEIS) to determine the effects of an Alaska Roadless Rule on Sitka black-tailed deer. That analysis relied on the “Interagency Deer Model”, which analyzed the “Percent (%) Original Habitat Capability Remaining” by biological province in Southeast Alaska (Tables 3.3b-2 and 3.3b-4 in DEIS). Table 2-11, on page 2-28, summarizes the comparison between alternatives for deer habitat capability and shows that the “No Action” Alternative 1 would be 88% and that all other alternatives would be “Similar to Alternative 1”.

Table 2 was provided to HCA by The Nature Conservancy, and shows the current suitable high-volume productive old growth (POG) in acres for each biogeographic province in the Tongass National Forest, and provides a comparison between Alternatives 1-6 of the DEIS. Page 3-95 of the DEIS states “*The greatest reductions in deer habitat capability have occurred, and will continue to occur, in provinces where timber harvest has been concentrated (the North Central Prince of Wales, East Baranof, and Etolin Island biogeographical provinces)*”. The K’iis Xaadas traditional territory spans two of the biogeographic provinces defined in Southeast Alaska: the North Central Prince of Wales and South Prince of Wales. In Table 2, the overall difference between alternatives across all biological provinces is 58,629 acres of suitable high-volume POG. While the Alaska Roadless Rule does not identify specific projects, there is definitely a difference between alternatives when it comes to available habitat for Sitka black-tailed deer and suitable old growth timber available for harvest. Further, the North Central Prince of Wales biological province provides the highest number of acres of suitable high-volume POG across all alternatives, and the difference between Alternatives 1 and 6 is 13,093 acres. The cumulative effects section on page 3-105 states “*Cumulative effects to modeled deer habitat capability would maintain 78 percent of the original level in 25 years and at 100 years. WAAs with the greatest impacts under the alternatives are located in GMU 2 (Prince of Wales and surrounding island) where concentrated past timber harvest has occurred*”. However, the recent Prince of Wales Landscape Level Assessment (POW LLA), which allows for harvest of 200 million board feet (MMBF) of old growth timber over the next 10 years on Prince of Wales, was not included even though it fits into the relevant analysis timeframe.

Table 2. Acres of Suitable High-volume Productive Old Growth by Alternative and Biogeographic Province in the Tongass National Forest (table produced by The Nature Conservancy).

Biogeographic Province	Suitable High-Volume Productive Old Growth (acres)					
	Currently Suitable (Alt 1)	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
E. Baranof Island	1,253	1,274	1,274	3,216	3,216	3,216
E. Chichagof Island	12,184	12,389	14,942	20,354	20,966	20,966
Etolin Zarembo Island	8,589	9,085	11,611	13,329	13,882	13,882
Kuiu Island	10,100	10,112	11,406	12,602	12,602	12,602
Kupreanof / Mitkof Islands	10,991	13,748	16,345	18,673	18,954	18,954
Lynn Canal / Mainland	2,507	2,677	2,677	5,155	5,525	5,525
North Central Prince of Wales	28,869	30,994	37,037	40,995	41,962	41,962
Outside Islands	3,196	3,318	3,318	3,985	3,985	3,985
Revilla Island / Cleveland Peninsula	13,737	15,279	20,764	24,249	24,787	24,787
South Prince of Wales Island	2,120	2,136	2,181	2,610	2,610	2,610
Stikine River / Mainland	1,368	1,368	2,506	4,367	4,394	4,394
Taku River / Mainland	36	36	36	37	37	37
W. Baranof Island	618	618	618	1,277	1,277	1,277
Yakutat Forelands	50	50	50	50	50	50
Total	95,623	103,091	124,772	150,904	154,254	154,254

HCA believes the Alaska Roadless Rule DEIS is lacking in proper analysis regarding the potential effects of the removal of essential deer habitat in areas where unfragmented habitat still exists. Further, the Preferred Alternative (Alternative 6) would be the first step needed in providing for timber harvest on Prince of Wales Island that would have significant and adverse impacts and cumulative effects on deer habitat. Table 3 was also provided to HCA by The Nature Conservancy, and does a better job of breaking down the differences between Alternatives when looking at the available high value deer habitat where logging and roadbuilding may occur in biogeographic provinces within developmental LUDs.

Table 3: Amount of deer habitat (as a percentage of the total) that will be in Development LUDs open to logging and roadbuilding, by the Biogeographic Provinces most likely to see increased logging and road building (table produced by The Nature Conservancy).

Biogeographic Province	High value Deer habitat where logging and roadbuilding may occur (% of total high value habitat on USFS land in that Biogeographic Province)					
	Current Development LUDs (Alt 1)	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
Etolin Zarembo Island Complex	24%	27%	26%	37%	48%	48%
Kupreanof / Mitkof Islands	15%	19%	19%	30%	50%	50%
North Prince of Wales Complex	26%	27%	27%	34%	43%	43%
Revilla Island / Cleveland Peninsula	11%	12%	16%	18%	31%	31%

OTHER GENERAL COMMENTS:

- One key aspect of a DEIS is the statement of the underlying purpose and need. Agencies draft a “Purpose and Need” statement to describe what they are trying to achieve by proposing an action. The purpose and need statement explains to the reader why an agency action is necessary, and serves as the basis for identifying the reasonable alternatives that meet the purpose and need. The agency must analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in the draft EIS. As a Cooperating Agency, HCA worked the USDA Forest Service and other Cooperating Agencies at the stage of the process between Scoping and the DEIS. As described in Attachment 1, Alternative 3 was shaping up to be a compromise that some Cooperating Agencies were taken seriously. The fact that the alternative included various “Priorities” outlined in the PDEIS such as a Watershed Priority and Community Priority, led HCA to believe that the alternative was certainly reasonable. Alternative 6 was never considered in any of the Cooperating Agency deliberations that HCA took part. And HCA believes that Alternative 6 does not meet the purpose and need for “Key Issue #3 – Conserve terrestrial habitat, aquatic habitat, and biological diversity” or “Key Issue #2 – Support local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors” for reasons given in this current comment letter. HCA believes that the DEIS failed to consider the reasonable alternative, and thus fails the intent of the NEPA evaluation.
- A good portion of the NEPA analysis defers to the fact that the DEIS is being developed to analyze the effects of rule-making, or a change in the 2001 Roadless Rule and how it applies to the Tongass National Forest. In cases where an analysis would benefit from a more localized scale, rather than regional, the DEIS states the effects would be analyzed on subsequent site-specific proposals under a new rule. HCA believes this places an undue burden on local communities and this should have been addressed in the Environmental Justice (pages 3-229 to 3-231) and/or under the Cumulative Effects (Appendix B). Currently, communities across the Tongass have put in insurmountable testimony in opposition of a change to the 2001 Roadless Rule. Communities such as Hydaburg do not have the time and/or resources to review large documents and provide meaningful comments; however, a change to the 2001 Roadless Rule has the potential implication for increased roadbuilding and timber harvest on Prince of Wales and within the K’iis Xaadas traditional territory. HCA engaged in the process, because we believe the implication of a rule change will be adverse to all of Prince of Wales. A rule change would subsequently set residents of Hydaburg and Prince of Wales up for having to participate in each of the site specific projects that would now be allowable under an Alaska Roadless Rule.
- In Attachment 1, HCA suggested that the scale of analysis was inappropriate, and after reviewing the DEIS this statement still holds true. On the subject of old growth timber harvest, it is repeatedly stated that the volume of harvest will not change and will be in accordance with the 2016 Forest Plan. While this statement is true, it is very misleading because depending on the alternative, the analysis does not do a very good job identifying WHERE on the landscape the expected changes to timber harvest and roadbuilding will occur with respect to the resources that are important to communities. Mapping this out on a smaller scale (i.e. traditional territory, USDA Forest Service Ranger District, Biogeographical Province) would benefit the analysis and

truly show the difference between the range of alternatives that were provided and their impacts on key issues and resources.

HCA appreciates the opportunity to provide comments on the DEIS as a federally recognized Tribe. While HCA intends to remain a Cooperating Agency in the next steps of the NEPA process, HCA would also remind the Alaska Roadless Rule team that resolution to the comments made here must be done directly back to the Tribal government. Therefore, HCA would request continued government-to-government consultation with the Secretary of Agriculture Sonny Perdue on the Alaska Roadless Rule.

Respectfully,



Anthony Christianson

Attachment 1: Hydaburg Cooperative Association's February 28, 2019 Comment letter on the Alaska Roadless Rule

Attachment 2: Figure 1 representing Hydaburg's traditional territory

REFERENCES

Goldschmidt, Water R. and Theodore H. Haas. 1998. Haa Aani Our Land, Tlingit and Haida Land Use Rights. Edited by Thomas F. Thornton. University of Washington Press.

Langdon, Stephen J. and Robert Sanderson. 2009. Customary and Traditional Knowledge of Sockeye Salmon Systems of the K'iis Xaadas (Hydaburg Haida). U.S. Fish and Wildlife Service, Office of Subsistence Management, Fisheries Resource Monitoring Program, Final Report (Project No. 07-651), Anchorage, Alaska.

Hydaburg Cooperative Association



February 28, 2019

Alaska Roadless Rule
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USDA - USFS Regional Office
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Dear Mr. Schmid,

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in blue ink that reads "Anthony Christianson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Anthony Christianson

Attachment 2

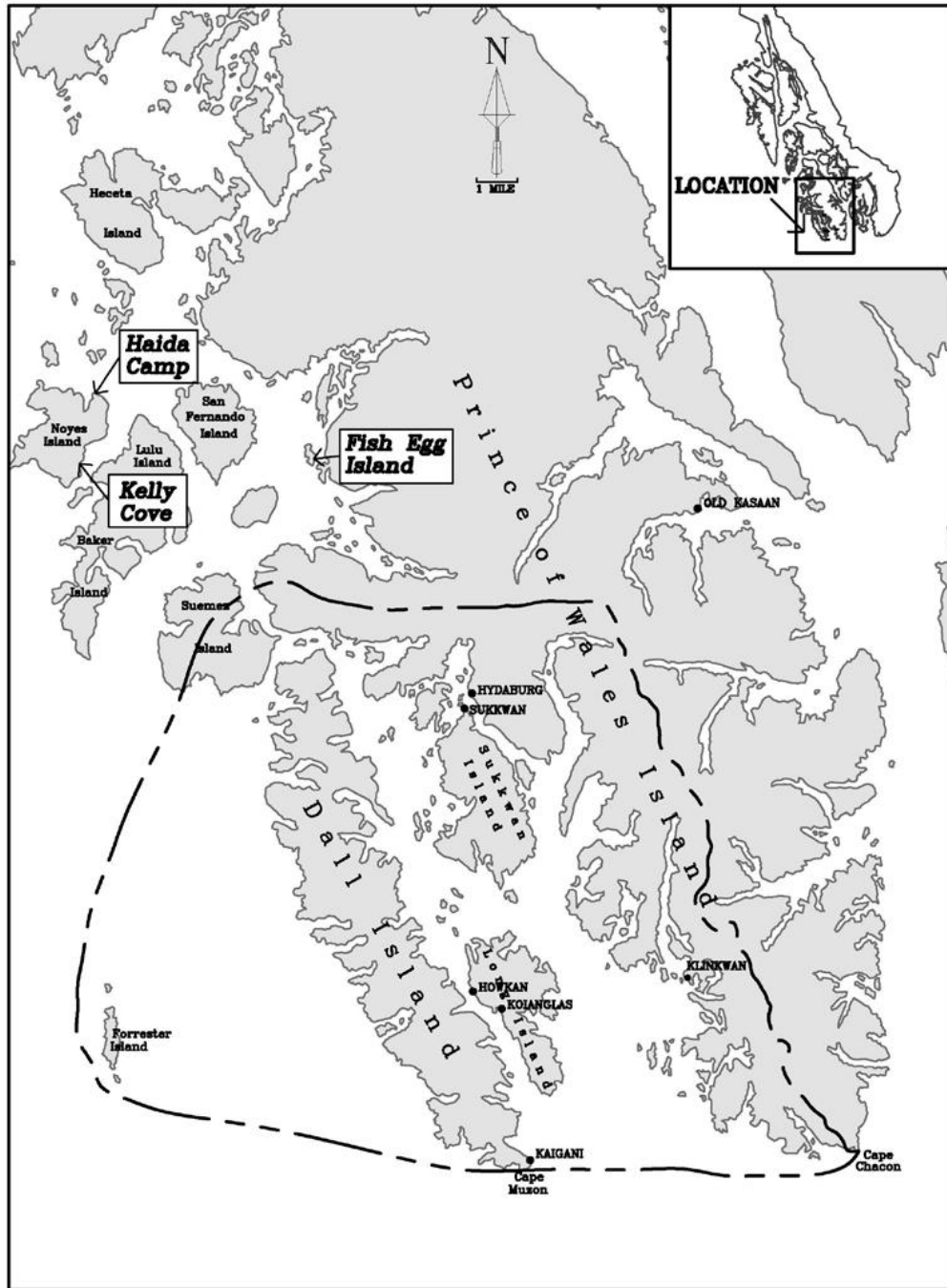


Figure 1. K'iis Xaadas traditional territory and villages, Hyadaburg, Alaska