

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

SOUTHEAST ALASKA CONSERVATION )  
COUNCIL *et al.*, )  
 )  
 *Plaintiffs*, )  
 )  
 v. )  
 )  
 EARL STEWART *et al.*, )  
 )  
 *Defendants*. )  
 )  
 \_\_\_\_\_ )

Case No. 1:18-cv-00005-HRH

**DECLARATION OF DAN BLANCHARD**

I, Dan Blanchard, hereby declare as follows:

1. I am a 90-percent owner and CEO of UnCruise Adventures (UnCruise), a small cruise ship company offering adventure cruise experiences around the world, with a focus in Southeast Alaska. UnCruise, founded 22 years ago, is a wholly owned subsidiary of InnerSea Discoveries Alaska, Incorporated, owned and incorporated in Juneau with offices in Seattle, WA, and Juneau, Alaska. As owner and CEO, I oversee all operations of UnCruise, including developing the cruise itineraries. I am intimately familiar with UnCruise’s mission and interests.
2. UnCruise currently employs 450 people of which 370 are ship-based crew out of Juneau, Alaska; roughly 55% of our shipboard crew work year round.
3. In Alaska, UnCruise operates seven ships with a passenger capacity ranging from 22-88. Typical itineraries range from 1-3 weeks in length during a season that extends from early April to early October.
4. UnCruise’s Alaska tours are focused on providing our customers unique, up-close nature experiences in pristine areas. During a typical itinerary, we make one village or small

town call a week; the rest of time is spent exploring remote areas of the Tongass. Our activities include kayaking, hiking, snorkeling, paddle boarding, skiff tours, and wildlife and bird viewing. Cruises include extensive educational opportunities that focus on the Tongass, history, and flora and fauna. We also offer marine biology and bird watching cruises in this area.

5. The areas which we are permitted to use change every year. Currently, seven of the thirteen Alaska itineraries, involving approximately 45-60% of our 7,000 Alaska passengers, stop at or near the North Kuiu Island. With a port call in Kake, our ships visit Kuiu's Saginaw Bay, Halleck Harbor, Port Camden and the nearby Keku Islands, and the coastal waters around these remote areas. In most cases, we use kayaks and skiffs to explore the coastline, looking for black bears and other wildlife. On the Keku Islands, our activities include kayaking, hiking, snorkeling, skiff tours and tide pooling. We also visit Security Bay, Rowan Bay, and Bay of Pillars with similar levels of activity and events.

6. We choose to use the North Kuiu area because it is lightly-traveled and provides the types of wildlife and wilderness experiences we want to offer guests to Alaska. This area also offers protected and secure anchorages for our ships and, thus, for many of our water and land-based excursions. North Kuiu is also important to us, because we are precluded from using many other places on the Tongass due to passenger limits set for some land designations, including wilderness and primitive areas.

7. UnCruise started consistently using the North Kuiu area around mid-2000s. Since 2010, our use of the area has increased dramatically from two to seven vessels and we have also extended our operations season by 60 days. For example, we have only been permitted to go ashore in the Keku Islands during the last three seasons; we now use the islands almost every day of the week. This increase in guided public use around North Kuiu was not reflected, forecast, or

considered in the Forest Service's 2007 analysis of the Kuiu Timber Sale or 2016 Supplemental Information Report. This year, due to use by other operators, we have also extended south into Port Camden.

8. Multiple other companies are also permitted to use North Kuiu. We work closely together to avoid simultaneously using the same areas. This not only ensures a quality guest experience but also helps spread the small cruise vessel fleet's impact on the areas we use.

9. Logging and associated industrial activities change the remote and non-industrial character of the Tongass, adversely affect wildlife that depends on these lands and waters, affect our ability to use such areas, and potentially affect our ability market and sell Southeast Alaska as an adventure travel destination. We would not take our ships to areas that feature fresh or recent clear cuts (normally 20-25 years before we can go back). We would also not take our ships to areas with active logging going on, because the sights and sounds associated with those activities are incompatible with what our customers expect and want to see while in the wilds of Southeast Alaska. As an example, when logging on Cleveland Peninsula started approximately 5-6 years ago, we had to avoid that area, pass it during the dark of night or stay further away from the shore to avoid the scene. This limited our route options, including shore-based activities, and also added fuel costs as we moved routes further east and west. Due to this logging, we dropped Myers Chuck as a stop which we had used for over a decade.

10. Every time we are restricted from using an area because it becomes unsuitable for our purposes, it is a big deal for us. It is a big deal, first, because any further loss of Tongass' ecological integrity erodes the very foundation for our tourism business. Secondly, it is a big deal because there are only a limited number of places that small cruise ships like ours can use, that is, places that we are permitted to use and that offer not just safe anchorage but also the

types of experiences that we want to offer our customers. When the small cruise ships are squeezed into using fewer and fewer places, it becomes harder to avoid overlapping uses, which comes at a high cost for us. Every time we lose a destination to incompatible uses like clear-cut logging, our bottom line is threatened.

11. Over the years, UnCruise has advocated for its interests in the Tongass, including Kuiu Island, as part of the administrative processes involving the Tongass Land Management Plan and the Roadless Rule. In March 2018, UnCruise, together with The Boat Company, also sent a letter to Forest Supervisor Earl Stewart describing the recent changes in the small cruise ship industry that reflect increased market demand for shore-based, high quality recreation experiences in the Tongass. In light of these changes, we urged Forest Service to cancel any plans to offer the timber sale at least until it has prepared an updated environmental analysis required by law.

12. If the Kuiu Timber Sale were to move forward, it would prevent UnCruise from using areas, including Saginaw and Security Bays, affected by the logging activities and resulting changes to landscape. Clear cuts younger than 20 years stand out like sore thumbs in the landscape and, based on my understanding, can affect dependent wildlife, including deer and bears, much longer than that. Active logging would make Saginaw Bay, including Halleck Bay and other nearby areas, unusable for us. Logging activities would disrupt the quiet and could disturb bears and other wildlife that our clients like to view. Logging would also affect our use of Keku Islands during calm days when sounds carry well over the water and logging becomes clearly visible. Depending on the activity levels there, UnCruise's interest in anchoring in Security and Rowan Bays could also be affected. Because all but one of UnCruise's ships carries too many passengers to be permitted in wilderness and primitive use areas, the company's

alternatives to stopping at Kuiu Island are very limited. There are no alternative destinations for UnCruise that offer equivalent routing convenience, location, secure all weather anchorages, and passenger experiences along its central southeast Alaska routes. The Kuiu Timber Sale would effectively squeeze UnCruise out of using this area and, thus, undermine our bottom line. It would also harm UnCruise's interests if the Forest Service pursued this sale based on outdated information about the economic value of this area and the economic impacts of its decision.

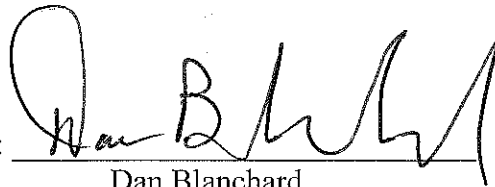
13. UnCruise's Southeast Alaska cruises, including ones with North Kuiu itineraries, are currently in full swing and we are actively marketing them for next year and beyond. If logging operations were to start on North Kuiu, we would not be able to perform the cruises that we outline in our 2019 and 2020 marketing materials as North Kuiu would have to be dropped from our already published marketing materials.

14. In sum, UnCruise has a strong economic and other interests in preserving public lands and waterways in the Tongass, including those on North Kuiu Island, that support Southeast Alaska's thriving visitor economy, including our small cruise vessel industry that is dependent on the region's world-class scenery, wildlife, and nature experiences. The Forest Service's unwise decision to pursue an uneconomical timber sale on Kuiu Island based on outdated information hurts UnCruise's interests both directly and indirectly. The timber sale would displace UnCruise from North Kuiu and force us to find new destinations at least until active logging operations are done and the logging scars and other impacts have healed—a process that could take tens of years or more. Finding new areas that provide the necessary features—sheltered waterways, protected anchorages, unique scenic views, and access to abundant wildlife—can be difficult especially because most of our ships are precluded from using many adjacent public areas. The Kuiu Timber Sale would pose major issues for our

planning, operational feasibility, and ability to market Southeast Alaska cruises in the future. Any business instability would likely also affect our employees, many of who are Alaskans. Moreover, this sale would threaten the integrity of Tongass and the very values that our small cruise vessel industry promotes and depends on.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Dated: 9/28/18

By:   
Dan Blanchard