

July 24, 2024

Secretary of Agriculture Tom Vilsack
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

RE: National Old-Growth Amendment / Tongass National Forest

Dear Secretary of Agriculture Vilsack,

I am writing on behalf of the Chilkat Indian Village (Klukwan) to express our strong support for the inclusion of Klukwan traditional territory within the Tongass National Forest in the proposed National Old-Growth Forest Plan Amendment (NOGA). Chilkat Indian Village (Klukwan) is deeply committed to preserving, maintaining, and protecting our traditional food systems and cultural resources, as the vast majority of the remaining old-growth forests within our homelands is found on the Tongass National Forest. These watersheds include the Chilkat River, Chilkoot River, Klehini River, Katzehin River, Takhin River, Taiya River, and Tsirku River, amongst other surrounding glaciers, lakes, creeks and streams. The protection of these old-growth forests and glaciers is essential to ensuring the well-being of our Tribal members, and we would like to see strengthened protections in the form of a rulemaking to ensure that our traditional food systems within our traditional territories are protected in perpetuity.

Every year, hundreds of thousands of salmon swim from the Pacific Ocean into the Jilḱáat Aani Ḵa Héeni (Chilkat River watershed) to spawn. The Klehini is a main tributary of the Chilkat, and both flow through the Alaska Chilkat Bald Eagle Preserve, which is critical habitat hosting the largest congregation of eagles in the world. Additionally, it is home to the Chilkat Tlingits and the people of Haines, Alaska, who depend on these waters for their food, economy, and culture.

Chilkat Indian Village (Klukwan) is a duly constituted Indian Tribe organized pursuant to the Acts of Congress of June 18, 1934 (48 Stat. 984) and May 1, 1936 (49 Stat. 1250), with the seven-member Tribal Council being the sole governing body of the Tribe as authorized by its Constitution and Bylaws. Chilkat Indian Village (Klukwan) Tribal Council is empowered by its constitution and by-laws to “manage and control all the economic affairs and enterprises of the Village,” “engage in any business that will further the economic well-being of the members of the Village,” and “preserve and cultivate the arts, crafts, and culture of the Indians of this community.”

Klukwan is a small, ancient, Alaska Native village positioned on the banks of the Chilkat River in Southeast Alaska, and our traditional territory encompasses 2.6 million acres of land stretching from Berner’s Bay on the Tongass National Forest, to Stonehouse Creek in contemporary British Columbia. The preservation of Tongass old-growth forests is vital to safeguarding our gathering practices, subsistence activities, culture, and ways-of-life within these river systems. We have witnessed the adverse effects of old-growth logging on our Tribal members, relatives and the lands and waters we have stewarded for thousands of years, and we as a sovereign Nation have continuously advocated for the protection of old-growth forests within our traditional territory.

We are aware of the United States Department of Agriculture's (USDA) draft environmental impact statement (DEIS) proposing to amend all land management plans for units of the National Forest

System to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions. However, we are concerned about the preferred alternative as outlined under the NOGA DEIS, published in the Federal Register on June 21, 2024, that could potentially allow large-scale commercial logging of old-growth trees in our traditional territory within the Tongass National Forest, undermining the conservation efforts and sustainability goals outlined in the preferred alternative.

At the same time, we are concerned that the preferred alternative also allows “for de minimis use for local community purposes.” This open-ended language could enable further large-scale commercial harvest of old-growth in the Tongass National Forest, and we urge USDA to remove this language or at a bare minimum, modify it so as not to allow large-scale commercial harvest. Similarly, the elimination in the DEIS of Standard 1 from the original proposed action removes language that prohibits degradation or impairment of old-growth forests. Paired with language about management “for the purpose of proactive stewardship” and “no requirement that [old-growth] areas continue to meet the definition of old-growth when managed for the purpose of proactive stewardship,” the amendment would allow for management actions that could degrade old-growth stands to the point of no longer meeting the definition of old-growth, counter to the goal of the amendment. While we are broadly in support of the goals of the Southeast Alaska Sustainability Strategy (SASS), in particular as it relates to small mill operators in Southeast Alaska, and the local economic services they provide to our communities, we remain concerned about the potential impacts to our communities should the SASS be modified, changed, or eliminated under a new administration.

Importantly, we strongly support the culturally significant uses exception, which is important for ensuring that our Tribal members may continue the selective cutting of trees needed to practice our culture and ways of life. We urge the USDA to retain this exception to support our cultural traditions and practices.

In conclusion, we respectfully request your support in preserving the remaining old-growth forests in the Tongass National Forest and urge the USDA to take action to ensure their protection from large-scale commercial logging.

Thank you for your attention to this matter. We look forward to your favorable response and collaboration in safeguarding the Tongass National Forest for future generations.

Sincerely,



Jones P. Hotch Jr.
President
Chilkat Indian Village

CC: Under Secretary, Dr. Homer Wilkes
Deputy Undersecretary, Meryl Harrell
Special Assistant, Sean Babbington
Planning Team Leader for the National Old Growth Amendment, Jennifer McRae

Juneau District Ranger, Michael Downs
Tongass Forest Supervisor, Frank Sherman