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Organization: Organized Village of Kasaan
Title:
Comments: Organized Village of Kasaan's Alaska Roadless Rule Comments

Please find the attached Alaska Roadless Rule DEIS comment from the Organized Village of Kasaan.

H[aacute]w'aa / Gunalch[eacute]esh / Thank you

Marina Anderson

Organized Village of Kasaan

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

December 17, 2019

USDA - USFS Regional Office

ATTN: Regional Forester, Dave Shmid

P.O. Box 21628

Juneau, AK 99801-1807

Dear Mr. Shmid and Alaska Roadless Rule Team,

The Organized Village of Kasaan (OVK) is making comments via this letter on the preliminary draft Environmental Impact Statement (DEIS). The comments in this letter do not express fully all of the OVK's concerns, but due to the short two-week turnaround time requirement from the United States Forest Service (USFS), we felt it was important to highlight our key concerns in this letter with an in-depth letter to follow.

In the abstract of the DEIS three key issues that are were identified: 1) conservation of roadless area characteristics; 2) support local and regional socioeconomic well-being including community stability, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors; and 3) conservation of terrestrial habitat, aquatic habitat, and biological diversity. At the end of the abstract it is stated that Alternative 6 is the preferred alternative chosen by the U.S. Department of Agriculture. We strongly believe that Alternative 6 does not conserve roadless area characteristics, does not support local and regional socioeconomic well-being including community stability, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors, and that Alternative 6 does not conserve terrestrial habitat, aquatic habitat and biological diversity.

1. Regarding deer habitat, page 3-224 of the DEIS states "Forest-wide, approximately 89 percent of the original (1954) habitat capability remains, ranging from 72 to 100 percent depending on the biogeographic province. The greatest reductions in deer habitat capability have occurred in provinces where timber harvest has been concentrated (the North Central Prince of Wales, East Baranof, and Etolin Island and vicinity biogeographic

provinces)." This is in contradiction with all three key issues. By altering habitat capability, roadless area characteristics change (key issue 1); Alaska Native culture is threatened (Alaska Native peoples use all parts of deer in different ways: for traditional garments, food, tools, etc.), rural subsistence activities are threatened due to less habitat capability (key issue 2); and clearly does not conserve terrestrial habitat.
2. Regarding subsistence, page 3-225 of the DEIS states "This EIS is programmatic, meaning that it examines direction and allowable activities for broad land areas, rather than schedule specific activities in specific locations. This makes it difficult to evaluate the effects of the alternatives on particular groups of subsistence users or resources." Because the EIS is programmatic, it is false to claim that this DEIS supports rural subsistence activities (key issue 2) because the effects of the alternatives are not properly evaluated in regards to "particular groups of subsistence users or resources."
3. Regarding subsistence, page 3-226 of the DEIS states "While there would be some new road access under all alternatives in the long run, nearly all new roads constructed under the alternatives would be closed following harvest. These roads would, therefore, not be available for use by highway vehicles or high-clearance vehicles."

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1. While the petition to put Yellow Cedar (Cailitropsis nootkatensis) on the endangered species list, it is disingenuous to expect that any alternative other than Alternative 1 would be healthy for the survival of this species. This species is essential to local Alaska Native peoples, as well as other entities and people that rely on this wood.
2. Regarding to ANCSA lands, page 3-127 of the DEIS states "It is likely that most of the state and private commercial forest land in Southeast Alaska, except for state parks and some other state lands, would be managed for the production of forest products under any of the alternatives considered in this analysis. A noteworthy exception to this is the recent decision by Sealaska to set aside 165,000 acres of forested land in Southeast Alaska for 110 years to store, or bank, carbon (Sealaska 2018)," yet it fails to recognize the cumulative effects that would occur when NFS lands are logged in the same area. The majority of the land that surrounds Kasaan is corporate ANCSA land and the majority of it has previously been timber harvested, predominantly clear-cut timber harvested. Due to the high volume of clear-cut logging that has occurred in the area, the DEIS does not properly identify the cumulative effects that would occur in relation of opening roadless areas near these pre-logged ANCSA lands.
3. ANILCA Section 810, there is no reference of a finding in the DEIS or at the subsistence hearings which is

inconsistent with ANILCA section 810 referenced here: "ANILCA Section 810 requires Federal land management agencies to evaluate the effects of their proposed actions on subsistence uses and needs. Where an agency finds that its action may significantly restrict subsistence uses, it is prohibited from implementing that action prior to taking certain steps. Those steps include: giving notice to certain State, local, and regional entities (including regional councils); giving notice of and holding hearings in the vicinity of the area

involved; and determining that (A) such a significant restriction if subsistence uses is necessary, (B) the proposed activity will involve the minimal amount of public lands necessary, and (C) reasonable steps will be taken to minimize adverse impacts on subsistence uses and resources. The agency must also provide its "may significantly restrict" finding and hearing notices within its environmental impact statement. ANILCA Section 810 hearings are held to inform the public that the land management action may significantly restrict subsistence uses, to verify the subsistence analysis, and to hear directly from the public concerning the acceptability of the likely restrictions on subsistence uses. The hearings required under ANILCA Section 810 cannot precede the required subsistence finding (FSH 2090.23)."

As stated above, please note that these are not all of our concerns, but some key concerns we wanted to state before the end of the December 17th public comment period. The Organized Village of Kasaan strongly opposed

a full exemption of the Alaska Roadless Rule and is in support of Alternative 1, the no action alternative.=

[Position]

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