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Alaska Roadless Rule USDA Forest Service, Alaska Region  
P.O. Box 21628  
Juneau, Alaska 99802-1628  
Submitted electronically at: [www.fs.usda.gov/project/?project=54511](http://www.fs.usda.gov/project/?project=54511)

**Attn: Roadless Area Conservation; National Forest System Lands in Alaska**

Dear Secretary Perdue,

Southeast Alaska Seiner's Association (SEAS) was established as a non-profit advocacy group for commercial seiners in 1968; which amounts to over five decades of experience battling issues that negatively affect the viability of our fishery in Southeast Alaska. We've weathered a lot of storms in those 50+ years that threatened our very existence and could have doomed our industry. One aspect that was always on our side was that the majority of the habitat salmon depend on, was pristine; and that the Tongass had a rich abundance of salmon producing streams. The 2001 Roadless Rule guaranteed to protect that critical habitat into the foreseeable future.

Seiners with salmon permits in Southeast Alaska rely on pink salmon, which are exclusively from natural production. Harvest levels were 38.2 million pink salmon during the period the 2016 Forest Plan FEIS used to assess baseline conditions for salmon. Since then production has plummeted; and the average harvest for 2016-2020 is estimated to be 18.7 million pink salmon- less than half the rate in the DEIS. These unprecedented declines have taken place under the Roadless Rule; one can only hazard to guess how harvest might have declined even further should habitat degradation due to clearcutting have coincided with this period of low productivity.

The Forest Service experts identify pink salmon as "by far – the most dominant 'forest fish' comprising the commercial Pacific salmon harvest ...." On average, pink salmon represented over 90 percent of the total commercial harvest from the Tongass National Forest from 2007-2016. Prince of Wales Island provides over a thousand miles of pink

salmon streams; more than any other area in southeast Alaska. Commercial fishing districts in Southern Southeast Alaska adjacent to Prince of Wales historically provide the majority of the commercial harvest of pink salmon in Southeast Alaska on even years. Simply put, any alternative other than Alternative 1, “no action”, is too large of a risk to pink salmon production. The Forest Service has identified three timber projects to meet the Tongass Advisory Committee’s (TAC) timber targets to meet the 2016 Forest Plan. The combined timber sales will remove nearly a billion board feet of timber from over 60,000 acres under the existing Roadless Rule. Again, we cannot compromise additional habitat above what is already being allowed under the status quo.

Another concern is for the protection of Coho habitat on Prince of Wales Island. It is documented that North Prince of Wales provides 1,904 stream miles of coho habitat; and the ADF&G fishery managers believe that decades of logging activities have reduced habitat for coho salmon due to alterations in stream channels, culverts that block fish passage, and effects on smaller streams.

The Forest Service already has a back log of red culverts and these culverts are a significant concern to fishermen. Roadless Rule repeal alternatives would add numerous stream crossings within the Prince of Wales and Central Tongass Project inventoried roadless areas, where nearly 800 red culverts already block at least 170 miles of spawning habitat in nearby watersheds.

The most highly productive fish habitat and areas intensively managed for timber production overlap. There must be protection afforded this habitat to ensure the continued ability to sustainably harvest salmon returns for commercial, subsistence, and sport purposes. That protection was, and is ,The Roadless Rule. The livelihood and economic viability of our coastal communities depend on this protection, and we request the adoption of the “no action” alternative.

Sincerely,



Susan Doherty  
Executive Director SEAS