

Alaska Roadless Rule: Draft Environmental Impact Statement, Subsistence Hearings Report

Introduction

This report summarizes subsistence-related oral testimony delivered during *Draft Environmental Impact Statement* subsistence hearings for the Roadless Area Conservation Rule; National Forest System Lands in Alaska (Alaska Roadless Rule) as required by the 1980 Alaska National Interest Lands Conservation Act. Subsistence hearings serve as important opportunity for rural Alaskans to provide oral testimony regarding impacts of federal land management actions on subsistence resources and use of subsistence resources. US Congress defined subsistence use in Title VIII of the 1980 Alaska National Interest Lands Conservation Act (ANILCA) as:

“The customary and traditional uses by rural Alaska residents of wild renewable resources for direct, personal, or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of non-edible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade.”

ANILCA provides for the continuation of opportunity for subsistence uses by Alaska rural residents on federal public lands across Alaska. ANILCA also established a harvest priority for rural residents in an attempt to protect subsistence resource harvest for rural community use. More specifically, during times of resource scarcity or when demand exceeds biologically-sound harvest levels, ANILCA directs that subsistence resource harvests have priority over other consumptive use of resources. ANILCA also requires the analysis of potential effects on subsistence uses of all actions on federal lands in Alaska. Analysis typically focuses on food-related resources most likely to be affected by habitat degradation associated with land management activities including three factors of particular concern including: 1) resource distribution and abundance; 2) access to resources; and 3) competition for the use of resources. Oral testimony delivered during subsistence hearings, hosted by the Forest Service, is one of several inputs used to analyze and determine potential effects of the proposed Alaska Roadless Rule on subsistence resources and subsistence resource use with particular focus on resource distribution and abundance, access, and competition.

During the 60-day public comment period (October 18 – December 19, 2019), 196 people provided oral testimony at 18 subsistence hearings conducted across Southeast Alaska in conjunction with

Table 1. Alaska Roadless Rule, ANILCA Subsistence Hearings

Hearing	Location	Date	Testifiers	Percent
1	Sitka	11/12/19	42	21%
2	Ketchikan	11/05/19	15	8%
3	Hoonah	11/14/19	14	7%
4	Petersburg	11/07/19	13	7%
5	Pelican	12/12/19	13	7%
6	Angoon	11/12/19	11	6%
7	Tenakee Springs	11/05/19	10	5%
8	Hydaburg	11/12/19	10	5%
9	Point Baker	11/19/19	9	5%
10	Gustavus	12/07/19	9	5%
11	Kake	11/22/19	9	5%
12	Wrangell	11/06/19	8	4%
13	Skagway	11/26/19	8	4%
14	Craig	11/06/19	7	4%
15	Haines	12/07/19	6	3%
16	Yakutat	11/05/19	5	3%
17	Kasaan	11/12/19	4	2%
18	Thorne Bay	11/13/19	3	2%
Total			196	100%



proposed Alaska Roadless Rule’s *Draft Environmental Impact Statement* public meetings (Table 1). Subsistence hearings were not conducted in Anchorage, Alaska or Washington, District of Columbia as they are outside the area of primary geographic interest. A subsistence hearing was also not conducted in Juneau, Alaska because rural subsistence harvest generally does not apply to urban communities with few rural residents. While this report summarizes common themes representing the range of perspectives presented during oral testimony, it is not exhaustive of all testimony. This report, however, describes the range of perspectives, opinions, and input regarding subsistence resource distribution and abundance, access, and competition.

The overall purpose of this report is to provide an overview of subsistence hearing public testimony including the following objectives: 1) identify common themes representing the full range of oral testimony; 2) highlight testimony regarding subsistence resource distribution and abundance, access, and competition; and 3) inform US Department of Agriculture’s evaluation of alternative effects on subsistence resource use and needs, availability of other lands for the purposes sought to be achieved, and other alternatives which would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes. This report addresses these objectives through the following substantive sections:

1. Methodology
2. Subsistence Testimony Overview
3. Procedural Concerns
4. Subsistence Resource Concerns
5. *Draft Environmental Impact Statement* Analysis Concerns

While this report represents the full range of public testimony provided during 18 subsistence hearings, it does not provide an agency response to testimony. Testimony perspectives, common themes of input, and salient points of concern are used to inform analysis of effects to subsistence resources and use of subsistence resources as presented in the *Final Environmental Impact Statement*. Subsistence hearing testimony also informs a determination required by ANILCA Section 810 and presented in the final rule.

Methodology

In total, 196 people provided oral testimony at subsistence hearings across 18 Southeast Alaska communities – the geographic area of primary interest. Nearly one-quarter (21%) of oral testimony was provided by Sitka residents, far surpassing the total quantity of oral testimony provided in other Southeast communities. Compared to Sitka, no other community provided the volume of oral testimony as measured by individual testimonies, however, Ketchikan, Hoonah, Petersburg, Pelican, and Angoon provided substantial amount of testimony with approximately one-dozen residents providing testimony in each community. Additional testimony was provided by 12 communities including Tenakee Springs, Hydaburg, Point Baker, Gustavus, Kake, Wrangell, Skagway, Craig, Haines, Yakutat, Kasaan, and Thorne Bay.

Oral testimony was recorded at subsistence hearings and later transcribed by a professional court reporter. Transcripts are available on the Alaska Roadless Rule’s project website and the audio files are available upon request. Transcripts were further reviewed and qualitatively analyzed to identify common themes of oral testimony. The general process for qualitatively analyzing oral testimony included:

1. Oral testimony recorded and transcribed.
2. Transcripts reviewed to identify unique substantive comments.
3. Substantive oral testimony content aggregated and summarized by common themes.



Subsistence Testimony Overview

Nearly two hundred people provided oral testimony at 18 subsistence hearings located across Southeast Alaska. The large majority indicated a preference for Alternative 1 – the no action alternative retaining the 2001 Roadless Rule across the Tongass National Forest. Those in support of Alternative 1 generally indicated the 2001 Roadless Rule works across Southeast Alaska by preserving roadless area characteristics while supporting economic opportunity for seafood and tourism industries, community socioeconomic well-being, subsistence lifestyles, and Alaska Native culture. Testifiers also frequently mentioned increasing and competing pressure for subsistence resources, dominance of economic interests over community preferences, skepticism regarding the influence of political pressure, and lack of trust in the Forest Service to manage public lands for current and future generations. Alaska Native communities, in particular, felt the 2001 Roadless Rule supported their way of life, cultural practices, subsistence harvest opportunities, economic interests, and honored their history as having occupied Southeast Alaska for time immemorial. A common theme across subsistence hearings highlighted significant concern regarding climate change, related changing local conditions, and Tongass National Forest value in combatting climate change and related environmental threats during uncertain times.

In contrast, few testifiers (approximately 10 people) supported Alternative 6 – the preferred alternative exempting the Tongass National Forest from the 2001 Roadless Rule, additional road construction, additional timber harvest, or federal deregulation in general. Those in support of Alternative 6 generally indicated the 2001 Roadless Rule is too restrictive, referenced the multi-use mandate for national forest management, supported additional timber harvest economic opportunity, or indicated a strong preference for less federal regulation, in general. Some testifiers also prioritized economic opportunity and indicated the roadless area characteristics can be sufficiently protected without the 2001 Roadless Rule. Few testifiers asserted additional roads would improve overall access to subsistence resources.

Of noteworthy importance, subsistence testimony was polarized with testifiers using the opportunity to communicate support for either Alternative 1 or Alternative 6 including rationale, supporting arguments, local knowledge, and additional points of consideration. Few testifiers supported Alternatives 2 through 5, however, some testifiers articulated support for select elements of other action alternatives including Community Use Priority roadless designation (Alternative 3) or increased environmental protections (Alternative 2). Perspectives regarding the proposed Alaska Roadless Rule's impact to subsistence resources including abundance and distribution, access, and competition was woven throughout position statements either supporting or opposing Alternative 1 or Alternative 6.

Subsistence testimony generally spanned three substantive themes including: 1) procedural concerns related to notification, tribal engagement, and subsistence hearing timing and format; 2) subsistence resource concerns including abundance and distribution, access, and competition; and 3) *Draft Environmental Impact Statement* environmental effects concerns. Each of these substantive topics of concern are further discussed in the following sections with focus on highlighting themes of common input, concerns, and perspectives.

Section 1 – Procedural Concerns

Testifiers providing subsistence hearing testimony consistently indicated concerns regarding the overall Alaska Roadless Rule project process, public engagement, public comment opportunity and consideration, and financial relationship between the Forest Service and State of Alaska. Systemic issues and specific problems associated with the proposed rulemaking process were noted across subsistence hearings and generally included criticisms regarding public notice, public participation, tribal engagement, subsistence hearing format, and additional concerns regarding overall rulemaking process and Forest Service consideration of public comments.



Theme 1 – Public Participation

Testifiers indicated public notice and public comment periods associated with the Alaska Roadless Rule project were insufficient in overall length of time, poorly timed, and oftentimes conflicted with Southeast seasonal activities. Limited public comment opportunity, expedited timeframe, and overall timing was frequently criticized in conjunction with the overall length, complexity, and magnitude of potential consequences of the proposed Alaska Roadless Rule. In short, testifiers generally felt there was not enough time to thoroughly review the *Draft Environmental Impact Statement*, develop meaningful comments and testimony, and that public input has been ignored throughout the project by the Forest Service as evidenced by a preferred alternative that does not reflect majority public comment. Several testifiers provided significant testimony regarding the burden of reviewing a complex *Draft Environmental Impact Statement* on a limited timeframe to provide written comments and oral testimony that would likely be disregarded by the Forest Service.

In short, testifiers indicated their communities, tribal governments, or stakeholder groups were not properly understood or accommodated regarding their collective position and preferred outcome on the proposed Alaska Roadless Rule. Testifiers supported assertions by referencing majority opposition to the proposed Alaska Roadless Rule as evidenced by written comments, public meetings, municipal government and tribal government resolutions, and additional stakeholder input submitted during the Notice of Intent’s scoping period and public engagement during the development of the *Draft Environmental Impact Statement*.

Theme 2 – Tribal Engagement

Testifiers consistently indicated Forest Service tribal outreach, engagement, and government-to-government consultation was insufficient throughout the Alaska Roadless Rule project. Some indicated tribal engagement did not honor or comply with the Forest Service’s government-to-government consultation responsibility. Additional criticisms spanned a variety of related observations and concerns including:

- Limited to no accommodation of tribal government preferences regarding roadless area management.
- Traditional and indigenous knowledge and preferences ignored throughout the Alaska Roadless Rule project.
- Delayed Forest Service engagement with communities demonstrated lack of good faith effort to engage and cooperate with tribal governments and local communities. Testifiers openly indicated the Forest Service was superficially collecting public input and tribal preferences would be not be considered beyond “checking the box” to move forward with a pre-determined decision.
- Forest Service did not respect the sovereignty of tribal governments and its citizens.
- Tribal governments requested and were denied government-to-government consultation.

Theme 3 – Subsistence Hearings

Testifiers indicated the process of holding subsistence hearings is problematic for a variety of reasons including:

- Underlying belief subsistence hearing testimony would not be meaningfully considered or accommodated in the development of an Alaska Roadless Rule.
- Attending subsistence hearings and providing oral testimony was problematic due to travel challenges, limited access to meeting venue, competing commitments, and overall scheduling and timing of subsistence hearings.
- Concern oral testimony could not be made anonymously.

Theme 4 – Federal-State Relationship Concerns

Testifiers perceived impropriety associated with how the Alaska Roadless Rule project prioritized political preferences over public process. Testifiers generally indicated the State of Alaska’s petition to initiate the regulatory rulemaking process was submitted under false pretenses and did not involve adequate public scoping, tribal engagement, or outreach to additional



stakeholder groups. Testifiers generally believed the proposed Alaska Roadless Rule reflects a political overreach motivated by flawed timber economics analysis rather than a land management decision informed by the best available information.

Additional testimony was provided regarding the Forest Service financially supporting the State of Alaska as a cooperating agency while not providing financial support for five additional tribal government cooperators. Testifiers also criticized contracts between the State of Alaska and timber industry, supported with Forest Service funding, to provide input for the rulemaking process while no support was offered to tribal governments, municipal governments, or other stakeholder groups. Testifiers perceived the federal-state relationship to be unethical and thereby undermining the incorporation of local, traditional, and indigenous knowledge and expertise.

Theme 5 – Other Procedural Concerns

Testifiers repeatedly indicated the proposed Alaska Roadless Rule is in conflict or contradicts existing resolutions, mandates, and responsibilities.

- Conflicts with the Forest Service’s specific and enforceable responsibility to protect and refrain from impairing tribal dependent resources. Testifiers asserted federal government land management priorities are different than state government priority – namely, the state government manages land for production priority while the federal government manages for multiple purposes while emphasizing tribal interests.
- Conflicts with the State of Alaska’s constitutional mandate to preserve resources for subsistence uses over other uses including commercial uses.
- Conflicts with the Forest Service mission statement to be responsible for sustaining health, diversity, and productivity of forests to meet the needs of present and future generations.
- Conflicts with Title VIII, Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA).
- Lack of clarity regarding how areas protected under the 2016 *Tongass Land and Resource Management Plan* would be impacted. Additional concern regarding future amendments and revisions to the 2016 *Tongass Land and Resource Management Plan* would loosen environmental protections and would allow greater impacts without the protections provided by the 2001 Roadless Rule.
- Conflicts with resolutions passed by multiple organizations including City of Pelican (Resolution 2019-17), Assembly of First Nations (Resolution 19-57), Organized Village of Saxman (Resolution 2018 10-223), and other resolutions submitted by municipal governments, tribal governments, and additional advocacy groups.
- Conflicts with the Tongass National Forest’s old-growth habitat and conservation strategy as adopted by the 1997 forest plan and later evaluated and modified by the 2016 forest plan amendment (*Final Environmental Impact Statement*, Appendix D – Evaluation and Integrity of the Tongass National Forest Old-Growth Habitat and Conservation Strategy).

Section 2 – Subsistence Resource Concerns

Testifiers indicated the proposed Alaska Roadless Rule would have far-reaching impacts on the entire subsistence way of life. For this reason, testifiers indicated the change represents not only a land management choice, but also an issue of deeper environmental justice with both regional and global impacts when considered cumulatively, such as widespread loss of rainforest and habitat in the face of climate change. Testifiers were concerned with how the proposed Alaska Roadless Rule would directly and indirectly impact subsistence resources, subsistence uses, and subsistence lifestyles. Subsistence resource concerns generally spanned three substantive areas including abundance and distribution, access, and competition. Additional testimony was provided regarding overall resource availability, geographic points of interest, and additional related information.



Theme 1 – Abundance and Distribution

Testifiers expressed concern regarding the abundance of subsistence resources and the impact the proposed Alaska Roadless Rule would have on long-term abundance. Testifiers indicated the abundance of subsistence resources and adequate habitat for those resources, both food and non-food, continues to decline. Some pointed to historic or current logging practices, while others indicated logging was not the cause for declines in subsistence resources. Climate change, which leads to consequences like rising water temperature, is affecting abundance. Other impacts to abundance included culverts, predation, road development, and overhunting. Testifiers were concerned about the lack of accounting for existing baseline levels for key subsistence resources including red cedar trees, deer, and fish populations.

Theme 2 – Access

Testifiers discussed concerns regarding impacts the proposed Alaska Roadless Rule would have on subsistence resource access with focus on resident access. Testimony generally highlighted beliefs additional roads would increase pressure on limited nearby subsistence resources and force residents to travel longer distances to harvest subsistence resources. Testifiers also indicated the Forest Service should better manage current roads instead of building new roads.

- Logging roads provide access to subsistence resources used for food, fuel, shelter, culture and art, and traditional medicines. Logging roads, however, also increase access for visitors and tourists thereby increasing overall pressure and competition for resources – especially resources near communities.
- With increased competition on nearby subsistence resources, residents are forced to travel longer distances to harvest subsistence resources and oftentimes at greater exposure to environmental threats related to weather conditions, water transportation, and harsh rainforest conditions.
- Geographic or seasonally modified access to subsistence resources can be dangerous because people are forced to hunt off-island, further from home, or during the wrong time of year and subsequently subject themselves to greater environmental dangers including weather, ice, snow, and predators.
- Forest Service should focus efforts on maintaining existing roads instead of adding new roads.
- Access to subsistence resources via roads built for logging or other activities is not guaranteed, nor is it necessarily a long-term solution because the roads are temporary.
- Logging slash negatively impacts deer and hunter access due to the damage left behind from large-scale logging and timber harvest operations.
- Access to forest resources for small-scale timber businesses is already limited due to existing and historical large-scale logging and timber harvest activities.

Theme 3 – Competition

Testifiers expressed concern regarding competition for subsistence resources and how the proposed Alaska Roadless Rule would increase competition or reduce availability of subsistence resources. Commonly referenced examples include:

- Increasing access to subsistence resources leads to competition for those resources and competition with tourists or visitors who come to fish, hunt, or forage thereby reducing the overall availability of subsistence resources.
- Reduced availability increases competition with predators.
- As hunting or gathering opportunities diminish in one area, competition increases in other areas.
- Competition with loggers for access to hunting grounds is known current problem and would likely worsen under the proposed Alaska Roadless Rule.

Theme 4 – Availability

Testifiers expressed concern with subsistence resource availability and the impacts the proposed Alaska Roadless Rule would have on overall subsistence resource availability. There was concern food security (i.e., traditional diet resources)



and non-food resources would be negatively impacted by roadbuilding and resource extraction. Many of the same lands that would be considered for timber harvest are lands that are prime habitat for subsistence resources. This conflict would affect overall availability of subsistence resources.

Theme 5 – Geographic Areas of Interest

Testifiers sought additional and improved mapping of future development activities that would likely occur due to the proposed Alaska Roadless Rule and to overlay subsistence resource-rich geographic areas to better illustrate geographic areas of potential conflict and inform testimony.

Of noteworthy importance, some testimony included maps of traditional sites. There was overall concern regarding the negative effects of the proposed Alaska Roadless Rule on traditional sites, cultural values, and ancient tribal subsistence areas. Testifiers requested protection of specific areas that are of importance for cultural or subsistence resources.

Kake testifiers, in particular, sought to have geographic areas around their community and several other nearby subsistence harvest areas excluded from potential roadbuilding associated with the proposed Alaska Roadless Rule. Testifiers from other communities also requested specified geographic areas be protected from road development and timber harvest including Hoonah Sound, Ushk Bay, North Chichagof (area 311), Yakutat and Poison Cove (area 339), and additional locations (Table 2). Notably, this report includes a select list of geographic locations as provided by testifiers as illustration of the range and diversity of locations. In short, testifiers articulated environmental effects occurring in common subsistence harvest geographic areas will have direct impacts on overall community well-being, viability, and social and cultural identity.

Table 2. Select Geographic Locations

Appleton
Bear Creek
Bohemia Basin
Chichagof Island
Hippleback
Hoonah Sound
Lenon Straits
Lisianski watersheds
Peril Strait
Phonograph Creek
Point Fredrick and North
Poison Cove
Rodman
Salmon Lake
Saloma Creek
Suntaheen Creek
Ushk Bay
Yakobi Island

Theme 6 – Alternative Economic Development Strategies

Testifiers asserted there are alternative opportunities for economic development that do not threaten subsistence resources, provide local economic opportunity, and are better aligned with local preferences than road building and commercial timber harvest. Oral testimony requested additional local economic development through a variety of different means including direct investment and support for seafood and tourism industries, focus on small-scale local forest products industry, investing in recreational infrastructure, and streamlining permitting processes for community projects. Testifiers also expressed support for integrating community priority areas into roadless area protections.

Theme 7 – Subsistence Lifestyle and Culture

Testifiers indicated the proposed Alaska Roadless Rule would be a direct attack on Southeast Alaska’s subsistence way of life, culture, and identity. Testifiers further supported the assertion by indicating the proposed Alaska Roadless Rule would yield negative impacts for the economic tradition of customary trade, community self-reliance culture, resident emotional and psychological health, spiritual well-being, Alaska Native culture, and the potential for future generations to participate in a subsistence lifestyle.

Theme 8 – Timber Industry Impacts

Testifiers indicated best practices for logging have not been followed historically, resulting in environmental impacts on both flora and fauna, infrastructure damage, disruption of ecosystem processes and ecological succession, and pollution of the landscape. Testifiers further indicated the timber industry has been supported with federal timber sales at the consequence of subsistence resources, lifestyles, and way of life. These past practices have reduced or eliminated



confidence in the Forest Service’s ability to ensure best practices would be followed in future projects. Testifiers also indicated timber harvest impacts on stream buffers have led to long-term problems for aquatic habitats due to both heat exposure and sedimentation thereby creating numerous opportunities for watershed restoration projects. Testifiers also indicated the timber industry is not viable in Southeast Alaska due to the following:

- heavy federal subsidization, suggesting lack of economic sustainability;
- failure to modernize and innovate;
- examples of recent large timber sales that failed to sell or received no bids;
- negligible impact of local timber industry jobs;
- exporting whole unprocessed timber overseas does not provide local jobs;
- limited overall economic impact on regional economy compared to tourism and seafood industries; and
- conflict between ideal habitats for fauna populations and ideal forested lands for the timber industry.

Section 3 – Draft Environmental Impact Statement Analysis Concerns

Testifiers expressed concern regarding assumptions and overall adequacy of the *Draft Environmental Impact Statement* analysis including far-ranging concerns related to key issues, alternatives, and effects analysis. Some testifiers indicated the proposed Alaska Roadless Rule’s *Draft Environmental Impact Statement* is in direct conflict with the 2001 Roadless Rule’s *Final Environmental Impact Statement*. Other testifiers indicated the proposed Alaska Roadless Rule’s environmental effects did not use best available information and conflicts with current research and science – especially as related to the impacts of timber harvest on wildlife and habitat. Testifiers indicated insufficient analysis of deforestation impacts on hydrology, local water flow patterns, and wetlands. Testifiers also expressed lack of confidence in the estimated acres of ecologically important areas to be impacted by the proposed Alaska Roadless Rule. In contrast, some testifiers indicated the perception the Tongass National Forest as pristine is inaccurate due to long-term impacts from prior road building, timber harvest, and additional natural resource extraction activities that have required ongoing long-term restoration work.

Theme 1 – Key Issues

Testifiers expressed a variety of concerns related to the responsiveness of alternatives to the key issues as identified in the *Draft Environmental Impact Statement* including conservation of roadless area characteristics, support for sustaining local and regional community socioeconomic well-being, and conservation of terrestrial habitat, aquatic habitat, and biological diversity. Testifiers frequently indicated the *Draft Environmental Impact Statement’s* preferred alternative, Alternative 6 exempting the Tongass National Forest from the 2001 Roadless Rule, is not responsive or supported by the effects analysis.

Key Issue 1 – Conservation of Roadless Area Characteristics

Testifiers indicated Alternative 6 fails to balance economic development with conservation of roadless area characteristics because it allows for development and natural resource extraction in Tongass National Forest roadless areas.

Key Issue 2 – Support for Sustaining Local and Regional Community-Focused Socioeconomic Activities

Testifiers disagreed with the assumption the proposed Alaska Roadless Rule would provide additional rural economic development opportunities. They recommended supporting seafood and tourism industries, recreation infrastructure, and streamlining the existing permitting process for important community projects as effective means of supporting rural communities, local jobs, and the regional economy without exempting the Tongass National Forest from the 2001 Roadless Rule.



- Testifiers perceived changing the roadless rule as a threat to the subsistence way of life due to impacts on local communities, culture, Native landscapes, self-reliance, food security, shelter, fuel, handcrafts, traditional medicines, emotional and psychological health, spiritual well-being, and future generations.
- While some testifiers discussed a need to identify and consider specific places of subsistence use and community harvest of subsistence foods, others disagreed with the idea of identifying specific locations.
- Testifiers referenced community planning documents as important reference material to inform the *Draft Environmental Impact Statement's* analysis as these documents describe locally generated and endorsed preferences for economic development.
- Testifiers were concerned about the impact of increased road construction and timber harvest activity on subsistence resources as articulated by a general belief increased development would negatively impact subsistence resources and subsequently force subsistence users to survive on less subsistence resources.
- Testifiers indicated changing the 2001 Roadless Rule would encourage outsiders to harvest the best resources leaving a diminished supply of lower-quality resources for resident harvest on nearby lands.
- Testifiers both supported and opposed the assertion the proposed Alaska Roadless Rule would provide additional economic benefit to local communities. Some indicated benefits would not be realized at the local level due to imported workforce. Others indicated logging opportunities would positively impact small isolated communities. Others spoke of secondary manufacturing opportunities providing economic benefits and potential tax revenue benefits for local governments and schools.
- Testifiers spoke about the advantages of improved access but were also concerned about the trade-off of allowing access for natural resource extraction industries such as logging and mining at the expense of environmental integrity and subsistence resources.
- Testifiers indicated the proposed Alaska Roadless Rule would negatively impact Southeast's subsistence way of life and threaten the ability of residents to continue living in small and isolated communities.
- Testifiers discussed the interdependent relationship between the Tongass National Forest's ecological health and the health of its residents living subsistence lifestyles.

Key Issue 3 – Conservation of Terrestrial Habitat, Aquatic Habitat, and Biological Diversity

Testifiers expressed concern about logging or mining impacts on ecosystems and the cumulative effects of climate change. Testifiers were concerned the basis for estimating potential timber harvest and the definition of detrimental impacts illustrated a misunderstanding of local resources and ecosystems. Several testifiers provided alternative environmental effects analysis contradicting *Draft Environmental Impact Statement* environmental effects.

Theme 2 – Alternatives

The large majority of testifiers expressed support for Alternative 1 – the no action alternative that retains the 2001 Roadless Rule on the Tongass National Forest. A very small minority (approximately 10 people) expressed support for Alternative 6 or for decreased federal regulation, in general. Few testifiers supported Alternatives 2 through 5, however, some testifiers articulated support for select elements of action alternatives including Community Use Priority roadless designation (Alternative 3) or increased environmental protections for watersheds (Alternative 2). Additionally, a few testifiers sought an improved balance between the 2001 Roadless Rule (Alternative 1) and a full exemption (Alternatives 6) without explicitly stating a preference for a specific alternative.

Alternative 1 (No Action Alternative)

The large majority of testifiers opposed exempting the Tongass National Forest from the 2001 Roadless Rule thereby supporting Alternative 1. Some testifiers indicated the existing 2001 Roadless Rule does not go far enough for environmental protection and restoration. Additional rationale for supporting Alternative 1 included:



- Tongass National Forest’s ecosystem cannot support additional resource extraction and the Forest Service should focus on restoration of the forest to a more pristine state.
- 2001 Roadless Rule best protects the national forest and Southeast’s subsistence way of life.
- Human health and community well-being are linked to Tongass National Forest ecosystem health.
- *Draft Environmental Impact Statement* is insufficient in capturing the effects associated with the irreversible nature of Tongass National Forest deforestation, especially in the face of climate change.
- Past road construction activities have created extensive and ongoing environmental problems.
- Past timber operations have demonstrated a lack of adherence to best practices.
- 2001 Roadless Rule best supports the seafood and tourism industry therefore is the most supportive of Southeast local and regional economy.
- 2001 Roadless Rule is good for the local economy due to healthy forests and watersheds as a key component of supporting a strong commercial fishing industry.
- 2001 Roadless Rule has not negatively impacted regional connectivity and access as critical roads, across the region, have already been approved and constructed on an as needed basis.
- Logging in Southeast is not economically viable and is heavily subsidized by the federal government.
- Forest Service has record of approving projects in roadless areas as evidenced 57 projects approved.

A small minority of testifiers expressed opposition to Alternative 1 based on the following perceptions:

- 2001 Roadless Rule is too restrictive for certain industries that rely upon the Tongass National Forest.
- 2001 Roadless Rule has negatively impacted the local and regional economy.
- General belief in decreased federal regulation and increased local control is best for local communities.

Alternative 6 (Full Exemption)

A small minority of testifiers (approximately 10 people) expressed support for Alternative 6 based on a variety of rationale related to economic opportunity, transportation needs, national forest management, or preference for decreased federal regulation, in general.

- Alaska’s economy is dependent on resource extraction and the Tongass National Forest can support both resource extraction and a thriving ecosystem.
- National forests are intended for multiple uses including natural resource extraction.
- Improved regional transportation access from more roads and ferries.
- Tourism industry is not good for the environment due to the overall carbon footprint.
- Additional roads improve access to resources and provides greater community development flexibility.
- Communities are best served by decreased federal regulation and increased local control of public lands.

A large majority of testimony opposed Alternative 6 citing environmental concerns about effects on Tongass National Forest ecosystems, roadless area characteristics, subsistence resources and culture, and community well-being. Testifiers also believed Alternative 6 was not aligned with public comment previously submitted by tribal governments, communities, and Southeast residents. Testifiers highlighted Alternative 6 would only continue to subsidize and support a timber industry that is not economically viable.

- 2001 Roadless Rule works for Southeast by balancing conservation with providing economic opportunity for the visitor and seafood industries.



- Timber industry no longer supports Southeast Alaska jobs and is not important for community socioeconomic well-being.
- Trading short-term timber harvest for long-term community well-being and sustainability is not desirable.
- Alternative 6 is the product of undue influence of statewide politicians and government officials and not reflective of local and regional preferences.
- Alternative 6 is non-responsive to key issues and not supported by the environmental effects.
- Alternative 6 is a threat to subsistence resource abundance and distribution, access, and competition.

Alternatives 2 – 5

A few testifiers expressed preference for Alternative 2 because of the expansion of environmental protections. Some testifiers expressed support for Community Use Priority roadless designation as described in Alternative 3. A Hydaburg tribal leader detailed having to withdraw support for Alternative 3 once the US Department of Agriculture identified Alternative 6 as the preferred alternative. A few testifiers indicated switching the preferred alternative from 3 to 6 violated the trust that was developed while building diversified support for Alternative 3.

Theme 3 – Effects Analysis

Testifiers expressed a variety of concerns related to the effects analysis as detailed in the *Draft Environmental Impact Statement*. Specific criticisms included inappropriate scale of analysis, limited focus on specific geographies, no acknowledgement of climate change, limited appreciation for Tongass National Forest’s ecological health, lack of regard for subsistence communities, and dissatisfaction with estimated cumulative effects.

Geography

Testifiers indicated the *Draft Environmental Impact Statement* did not adequately address site-specific impacts the proposed Alaska Roadless Rule would likely yield across the region and concentrated in specific geographies.

- Analysis fails to address the uniqueness of different geographic areas across the Tongass National Forest.
- Analysis fails to address how regional changes are felt everywhere due to the ripple effects across an interconnected ecosystem and region.
- Analysis fails to address impacts on individual communities with focus on impact to culture.
- Analysis does not address the geographical concerns of local communities related to key archeological and ancient tribal lands, unsettled traditional lands, and sacred sites.

Climate Change

Testifiers found the *Draft Environmental Impact Statement* failed to address the value the Tongass National Forest has in combatting climate change. Furthermore, the analysis failed to recognize the relationship between the Tongass National Forest, climate change, and related environmental effects.

- Analysis fails to properly address how increased deforestation will impact carbon stores and carbon sequestration in the Tongass National Forest and the negative impact of that loss on a global scale.
- Analysis fails to address how the impacts of climate change are already impacting ecosystem health regionally and how that may be amplified under future conditions.
- Analysis is short-sighted and analyzes environmental impacts on a scale that does not appropriately capture the time required for ecosystem recovery or the current and future impacts of long-term climate change on these recovery periods.
- Shipping whole unprocessed timber overseas was not analyzed for its impact on climate change.



Ecosystem Health

Testifiers indicated the *Draft Environmental Impact Statement* failed to provide adequate analysis regarding the impact of the proposed Alaska Roadless Rule on the Tongass National Forest's overall ecological health including:

- Ecological succession is not characterized appropriately related to its timeline and processes.
- Lifecycle and generational impact of habitat loss on wildlife species and their ability to reestablish communities.
- Importance of old-growth forest ecosystems to both terrestrial and aquatic species.
- Impact of ecosystem health on human health.
- Intrinsic resource and ecosystem service value of preserved pristine wilderness.
- Impact of forestry practices on decreased ecosystem biodiversity and the intrinsic value thereof.
- Irreversible nature of the damage that would be inflicted upon old-growth forest ecosystems.
- Loss of habitat for both terrestrial and aquatic species (both fresh and marine).

Subsistence Communities

Testifiers indicated the *Draft Environmental Impact Statement's* largest deficiency is inadequate analysis of the proposed Alaska Roadless Rule's impact on subsistence communities. Testifiers further articulated the inadequate analysis reflects a failure of the federal government to protect Alaska Native subsistence communities and their resources.

- Analysis fails to comprehensively consider impacts of the proposed rule by considering each key resource that is integral to the traditional subsistence diet ranging from terrestrial species such as deer, berries, beach greens and other vegetation, to aquatic species such as salmon, herring, sea vegetation, and medicinal plants.
- Analysis fails to provide analysis on the generational impacts the proposed Alaska Roadless Rule will have on subsistence communities, their populations, well-being, and culture in the long-term future.
- Analysis fails to adequately address impacts the proposed Alaska Roadless Rule will have on specific geographies and how losses will result in profound existential and psychological impacts on local native populations' physical and mental health.
- Analysis fails to adequately capture the specific and heightened issues that subsistence communities face due to the nature of being located on islands, across Southeast Alaska, and the distinct and unique challenges presented by remote and isolated geographic locations.
- Analysis fails to consider deforestation as one of the four common factors associated with the decline and fall of civilizations.
- Analysis does not consider changes in population dynamics and growth patterns over time and how increased timber harvest on the Tongass National Forest will impact and be impacted by large-scale population change.

Cumulative Impacts

While the *Draft Environmental Impact Statement* addresses several environmental impacts and concerns, testifiers indicated analyses are insufficient and do not adequately address the cumulative impacts of combined and accumulated environmental degradation. Testifiers indicated a comprehensive analysis should include the cumulative impacts that occur in both the near- and long-term futures of likely road construction and timber harvest activities. Deforestation will impact and is impacted by ongoing climate change, which will impact ecosystem processes, ecological succession, habitat degradation, spatial distribution of populations, and additional environmental characteristics. Considering deforestation impacts changes in hydrology, the cumulative impacts on both terrestrial and aquatic species are not considered holistically.

