



November 19, 2007

Mr. Hans Von Rekowski  
IDT Leader  
Sitka Ranger District  
204 Siginaka Way  
Sitka, AK 99835

Re: Iyouktug Timber Sale DEIS

Dear Mr. Rekowski:

TU-1 | I am commenting on behalf of the Alaska Program of Trout Unlimited and would like to voice our opposition to several components of the Iyouktug Timber Sale DEIS and the proposed action noted therein.

Although we see merit in efforts by the Forest Service to provide stable long-term timber supplies to local operators, an almost 60 mmbf harvest level as proposed in Alternative 2, takes this concept too far given the significant amount of critical fish, bear and deer habitat and Inventoried roadless Areas which would be impacted. This is especially the case given the amount of timber harvest which has already taken place in the sale area.

TU-2 | Fish

A panel convened to assess the levels of risk to fish habitat from timber harvest and related activities associated with management alternatives in the 1997 Tongass Land Management Plan revision expressed 5 primary issues of concern (p. 22B6Klap, 1997). These concerns bear directly on proposed actions within the Iyouktug DEIS, primarily those associated with the three Inventoried Roadless Areas it contains:

1. Roads may have negative effects on fish habitat. These effects could come from sedimentation when roads were constructed on slopes that are too steep. Stream crossing structures, especially culverts, may block movement of juvenile fish and result in a long-term reduction of available fish habitat. In addition, the panel expressed concern about an increased risk of overharvests of fish, especially steelhead, cutthroat trout, and sockeye

- TU-2  
(cont.) | salmon, because fishermen would have improved access from roads.
- TU-3 | Panel evaluators identified Prince of Wales, Kupreanof, Kuiu, and Chichagof islands as currently having road densities sufficient to be of concern to maintaining adequate fish habitat. The panel stated in conclusion, "A reduction of road development in any alternative reduces risks to fish habitat." (Emphasis mine).
- TU-4 | 2. The amount of timber harvested under any alternative was the second highest risk to fish habitat. This risk increased as the number of acres harvested increased.
- TU-5 | 3. Allocation of reserves free of timber harvest reduces the risk to fish stocks. The panel recommended that the most effective protection of fish habitat would be reserves that included entire watersheds rather than only parts of watersheds.
- TU-6 | 4. Results of watershed analysis may affect management decisions. The panel recommended that a watershed analysis be conducted before decisions are made on how management activities would be applied on the ground.
- TU-7 | 5. Timber harvest activities in the upper reaches of watersheds where fish do not occur may affect habitat. Protection of these areas would help maintain and protect fish habitat farther downstream. Timber harvest in these areas is especially important in affecting the rate and amount of wood and sediment delivery.
- TU-8 | Bear  
Roads and timber harvest have a similar negative impact on brown bears and here again, Northeast Chichagof has been identified as an area of particular concern. In "Brown Bears of Unit 4- A Status Report and Issues Paper" (Paul, 1998), the Alaska Department of Fish and Game states, "Human-caused mortality is the dominant cause of mortality in adult brown bears. Based on our sample of radio-collared bears a higher portion of mortality was attributed to defense of life and property and illegal kills on Chichagof Island than on Admiralty Island. Road access and development activities were highly correlated with bear mortalities on the Northeast Chichagof road system." (Emphasis mine).

Deer

TU-9

The Iyouktug Timber Sale DEIS states, "Connectivity along riparian areas and between habitats at different elevations has been reduced by past clear cutting." The DEIS also makes note of various studies showing the importance of old-growth and connectivity to deer and their winter survival, yet the DEIS appears to conclude that, "Effects (of Alternative 2 and 4) are considered moderate because activities are expected to reduce the number of deer but sufficient habitat would remain functional to maintain the viability of the species."

TU-10

Given the timing of the DEIS release it is clear this conclusion was reached before statistics on deer mortality during the winter of 2006 were made public. ADFG now estimates that roughly 85% of the Chichagof deer herd was lost last winter (ADFG- personal communication) and has recently closed the Hoonah area to the taking of does. These conclusions and actions were derived at a time when approximately 60 mmbf of trees the Forest Service intends to offer for sale were standing and providing utility to deer. Removing that amount of timber from the equation without due regard for recent findings could prove catastrophic to the deer that remain.

TU-11

Conclusion

The foregoing information on the impacts to fish, bear and deer associated with road density and timber harvest, especially that which has taken place on Northeast Chichagof, indicate that timber harvest levels and road building as proposed Alternative 5, is simply the best way to both provide timber to local operators and conserve and protect the valuable fish, bear, and deer resources in the Iyouktug Sale Area. We urge the Forest Service to adopt this alternative.

Sincerely,

Mark Kaelke  
Southeast Alaska/Tongass Project Director  
419 Sixth Street, Ste. 200  
Juneau, AK 99801

**Responses to TU – Mark Kaelke, Trout Unlimited**

**TU-1** – The IDT and the Responsible Official considered many alternatives in detail (DEIS and FEIS, Chapter 2, Alternatives 1 through 5) as well as alternatives which were eliminated from detailed analysis for the reasons described in Chapter 2, Alternatives Considered but Eliminated from Detailed Study section. As identified in the Introduction of Chapter 2, Alternative 3 is the preferred alternative. Please also see response to BC-4 and EH-1. The effects to bear foraging habitat was addressed in the DEIS and FEIS, Chapter 3, Management Indicator Species (MIS) and Other Wildlife, Affected Environment and Environmental Consequences for Brown Bear.

**TU-2** – The effect of roads on sedimentation and fish habitat are described in Chapter 3 of the DEIS and FEIS, Watershed and Fish, Environmental Consequences, Direct and Indirect Effects on Water Quality-Sediment and on Fish. The effects on potential to over harvest fish from roads was updated in the FEIS, Environmental Consequences section, based on your comment. Many of the standards and guidelines in the Forest Plan were based, to a large extent, on the recommendations of the Anadromous Fisheries Habitat Assessment (AFHA). AFHA is considered the most comprehensive scientific review available for the Tongass. The 1997 ROD noted that the standards and guidelines and other direction included in the Forest Plan meet or exceed all of the recommendations by AFHA.

**TU-3** - The effects of roads on fish habitat are disclosed in Chapter 3 of the DEIS and FEIS. The potential impacts of the Iyouktug project on fishing have been considered and added to Chapter 3 of the FEIS, Watershed and Fish section.

**TU-4** – The potential for timber harvest to affect fish habitat is discussed in Chapter 3 of the DEIS and FEIS.

**TU-5** - Your comments regarding allocating reserves free of timber harvest that would include entire watersheds rather than only parts of watersheds were considered. We agree with the panel's recommendation that reserving entire watersheds would effectively protect fish habitat, however, in the Essential Fish Habitat Potential Adverse Effects on Freshwater EFH section analysis (DEIS and FEIS, Chapter 3 Environment and Effects, Watershed and Fish) we did not find fish stocks to be at risk. The Forest Service analyzed cumulative effects at a scale appropriate for each resource. The analysis determined that Forest Plan standards and guidelines and non-development LUDs maintain fish and wildlife and their habitat (DEIS and FEIS, Chapter 1, Purpose and Need, Issues and Essential Fish Habitat, Chapter 3, Watershed and Fish). Furthermore, the 2008 Forest Plan Amendment has designated Old Growth Reserves which encompass entire watersheds to the north and south, adjacent to the project area.

**TU-6** – The Forest Plan does not require Watershed Analysis unless riparian standards and guidelines are modified or public water supply is involved. Neither applies to this project. Nonetheless, a detailed, field-based assessment was completed and is directly relevant to the effects analysis. It is summarized in the DEIS and FEIS Watershed section

**TU-7** –Protecting the upper reaches of watersheds for downstream fish habitat is important regarding the amount of wood and sediment delivery to downstream fish habitat. AHMU class, channel types and process groups are used to assign appropriate buffers (see Table B-1, Appendix B of the DEIS, page 3) not only for Class I and II fish streams, but on high gradient Class III streams that flow into fish habitat and have sufficient flow or sediment and debris

transport to directly influence downstream water quality or fish habitat capability (Aquatic Habitat Management Handbook, FSH 2090.21). Streams in the Iyouktug Timber Sales units were field verified by hydrology and fisheries technicians. Stream class, channel type and process group were determined in the field and specific recommendations for protection are documented in the unit cards.

**TU-8** – Thank you for providing information on brown bears and mortalities. The DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species and Other Wildlife, Environmental Consequences for Brown Bear section address the effects of human caused mortalities and roads to bears and their habitat.

**TU-9** – Your statement is supported in the DEIS and FEIS, Chapter 3 (and the Wildlife and Subsistence Resource Report), Management Indicator Species (MIS) and Other Wildlife, Environmental Consequences for Deer section.

**TU-10** – The analysis was updated to reflect recent information about deer mortalities and the doe hunting closures that resulted from the 2006-2007 winter. Please see response to SCS-13 for more information.

**TU-11** – Please see responses above regarding specific concerns on fish, bear and deer on Northeast Chichagof. The Decision Maker will consider your preference for Alternative 5.



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
1689 C Street, Room 119  
Anchorage, Alaska 99501-5126



9043.1  
ER07/810  
PEP/ANC

November 16, 2007

Mr. Forrest Cole, Forest Supervisor  
Tongass National Forest  
648 Mission Street  
Ketchikan, Alaska 99901

Dear Mr. Cole:

The U.S. Department of the Interior has reviewed the Draft Environmental Impact Statement (EIS) for the Iyouktug Timber Sales. The Draft EIS evaluates five alternatives which provide various combinations of resource outputs and spatial locations of harvest units on the Hoonah Ranger District. We believe the following comments need to be taken into account in the Final EIS. These comments are submitted in accordance with the Fish and Wildlife Coordination Act, the Alaska National Interest Land Conservation Act, the National Environmental Policy Act, and the Council on Environmental Quality guidance for providing technical expertise on water, biological, and geological resources.

The 1997 Tongass National Forest Land and Resource Management Plan addressed the goal of maintaining viable and well-distributed fish and wildlife populations across the Tongass through implementation of the Tongass Conservation Strategy, a landscape conservation approach with special emphasis on old growth reserves, various no-harvest buffers, and canopy retention in some timber harvest areas. We continue to support the Conservation Strategy as an effective way to accomplish this important conservation goal. We appreciate the long history of the U.S. Forest Service and the Fish and Wildlife Service working together to develop and implement conservation measures to address this goal.

If you have questions concerning our comments, or if we may be of further assistance with regard to trust resource information, please contact Mr. Bruce Halstead, Juneau Fish and Wildlife Field Office Supervisor, at (907) 780-1161. Questions regarding our comments on water quality may be directed to Lloyd Woosley, Chief of the U.S. Geological Survey Environmental Affairs Program, at (703) 648-5028 or at [lwoosley@usgs.gov](mailto:lwoosley@usgs.gov).

Sincerely,

For: Pamela Bergmann  
Regional Environmental Officer – Alaska

## ATTACHMENT

GENERAL COMMENTS**Small Old Growth Reserves**

USBI-1 | We recommend implementation of the most biologically effective locations for Small Old Growth Reserves (OGRs) in Value Comparison Units (VCUs) 2080 and 2090, and maintaining connectivity between these and other components of the Conservation Strategy. We believe it is important that the Small OGRs as shown on the maps for action alternatives 2-5 be adopted in the Agency Preferred Alternative in Final Environmental Impact Statement (Final EIS) and the Record of Decision (ROD). Adoption of these biologically-preferred OGR locations will help reduce risks to vulnerable trust resources, primarily migratory birds, and other old-growth-dependent rare and endemic species, thereby minimizing the risk that protection under the Endangered Species Act would be required.

**Queen Charlotte Goshawk**

USDI-2 | Goshawks were observed in Units 108, 1711, 173, 175, 818, 901, 904, east of 980 and north of 982. Pluck posts were located in Units 125, 130, 923 and 942 and in the OGR. Goshawk nest sites were located in Units 107 and 901 (Draft EIS page 3-136). Current forest plan standards and guidelines (USFS 1997b, pp. 4-90 to 4-91) require maintenance of an area of not less than 100 acres of productive old growth forest generally centered over the nest tree or probable nest tree. Research on Queen Charlotte goshawks in British Columbia has documented post-fledging areas of up to 230 hectares (568 acres) (McClaren et al. 2005). We recommend that 500 acres of old forest habitat be retained around all known nest stands.

USAI-3 | Effective management of goshawk nesting habitat depends on the knowledge of nest locations. We recommend that the ROD require implementation of a goshawk inventory and monitoring program consistent with the guidance found in the U.S. Forest Service's (USFS) recent publication on this topic (Woodbridge and Hargis 2006).

**Subsistence**

USAI-4 | The Iyouktug area is within documented community and subsistence use areas for Hoonah, Gustavus, and Angoon. These communities are classified as rural and receive subsistence priorities under the Alaska National Interest Lands Conservation Act (Draft EIS page 3-128). This part of Chichagof Island has been impacted by historic timber harvest at low elevations and road construction activities (Draft EIS Summary, p. iv). Deer use old growth forest corridors to move between low elevation winter habitat and high elevation summer habitat. The proposed harvest and associated road construction would reduce habitat connectivity for Sitka black-tailed deer and potentially reduce the current and future subsistence harvest levels by removing additional low elevation forest and travel corridors connecting low and high elevation habitat. Table 2-2 of the Draft EIS states that deer habitat connectivity in the productive old growth below 800 feet would be reduced by 6.1 percent, using the preferred alternative.



US01-4  
(cont.)

To help minimize or prevent restrictions on subsistence, we recommend that the USFS maximize protection of important deer winter range and migratory routes through modification of harvest unit configuration, harvest prescriptions, and road management. Kirchhoff and Thomson (1998, p. 13), for example, recommended light selection logging that removes no more than 3 adjacent trees per harvested patch, to create a fine-grained interspersion of gaps and cover, on deer winter ranges. We recommend such an approach to provide multiple-use management of these productive lands.

**Cumulative Effects**

US01-5

There is a potential for cumulative impacts upon trust resources and their habitat. The Draft EIS states that there are 265 acres of land under Huna Totem Corporation ownership (timber rights purchased by Sealaska Corporation) in the northwestern corner of the Iyouktug project area (Draft EIS page 1-9 and Figure 1-2). About 100 acres of this private land has been harvested and some (acreage unspecified) is scheduled for harvest within the next 2 to 3 years (Draft EIS page 1-9). The 40,651-acre project area also includes approximately 5,050 acres encumbered by Huna Totem Corporation. The Huna Totem Corporation has not reached full entitlement under the Alaska Native Claims Settlement Act. We recommend that in the Final EIS, the risk levels of VCUs reflect the cumulative effects of harvesting both throughout the timber sale area and on adjacent, non-Tongass National Forest lands, since forest-dependent wildlife respond to the availability of habitat across the landscape.

**SPECIFIC COMMENTS**

US01-6

Draft EIS, page 3-74: There are an estimated 66 bald eagles nest sites in the project area. Although bald eagles were observed in the project area, nests were not identified in the units proposed for harvest. Bald eagles, their eggs, and their nests are protected throughout the United States by the Bald and Golden Eagle Protection Act, and by the Migratory Bird Treaty Act. Eagles can be sensitive to habitat alterations and disruptive activities near their nests, leading, in some cases, to nest abandonment, mortality of eggs or young, or destruction of a nest. To help land stewards and others avoid causing such impacts, the U.S. Fish and Wildlife Service has developed guidelines for management of nest sites. We recommend that the Forest Service implement these guidelines in the Iyouktug Timber Sales. The National Bald Eagle Management Guidelines can be downloaded at:

<http://www.fws.gov/migratorybirds/issues/BaldEagle/NationalBaldEagleManagementGuidelines.pdf>

US01-7

Draft EIS, page 3-135: Forest owls, specifically western screech owls, barred owls, and northern saw-whet owls should be included in the Final EIS list of nesting raptors to be surveyed in the project area.

US01-8

Draft EIS, p. 3-135: The Tongass Land and Resources Management Plan Final EIS identified the marbled murrelet as a species of special management concern (USFS 1997a, page 3-351). We recommend that the Iyouktug Timber Sales Final EIS evaluate potential impacts to this



USDI-8  
(cont.) species, which nests in old growth forests throughout the Tongass National Forest. A recent review of the marbled murrelet's status by the U.S. Geological Survey (Piatt et al. 2007) documents apparent population declines for the species throughout Southeast Alaska, and discusses factors affecting the bird. We recommend that you review this document (available for download at <http://pubs.usgs.gov/of/2006/1387/>) as you consider potential impacts to the bird from the alternatives under consideration for the Iyouktug Timber Sales.

USDI-9 Draft EIS, page 3-152, first paragraph: The paragraph explains that loss of shade can affect stream temperature, and then describes a study on Prince of Wales Island that showed that there was no relation between forest harvesting and high stream temperatures after 15 years. However, as is stated near the bottom of page 3-154, recovery can take 10-30 years; therefore, temperature effects may occur in the first few years after forest harvesting, which would not have been detected in the studies on Prince of Wales Island. Consideration of potential short- to medium-term effects from proposed forest harvesting, such as the effects of the loss of shading on fish habitat, is warranted. We believe the Final EIS should state, pending such an assessment, that the 15-year study is inconclusive on whether any shorter-term changes in stream temperatures may occur due to a reduction in shading which might be related to forest harvesting.

## REFERENCES

- Kirchhoff, M. D., and S. R. G. Thomson. 1998. Effects of selective logging on deer habitat in Southeast Alaska: a retrospective study. Alaska Dept. of Fish and Game, Div. of Wildlife Conservation. Federal Aid in Wildlife Restoration Research Final Report. 37 pp.
- McClaren, E. L., P. L. Kennedy, and D. D. Doyle. 2005. Northern goshawk (*Accipiter gentilis laingi*) post-fledging areas on Vancouver Island, British Columbia. Journal of Raptor Research 39:253-263.
- Piatt, J.F., K.J Kuletz, A.E. Burger, S.A. Hatch, V.L. Friesen, T.P. Birt, M.L. Arimitsu, G.S. Drew, A.M.A. Harding, and K.S. Bixler. 2007. Status review of the Marbled Murrelet (*Brachyramphus marmoratus*) in Alaska and British Columbia: U.S. Geological Survey Open-File Report 2006-1387, 258 p.
- USFS. 1997a. Tongass Land Management Plan Revision, Final Environmental Impact Statement. USDA Forest Service, Tongass National Forest, R10-MB-338dd (Record of Decision, Final Environmental Impact Statement—Part 1 and Part 2, Map Packet, Appendix—Volume 1, Volume 2, Volume 3, Volume 4, and Errata). Alaska Region, Juneau, Alaska.
- USFS. 1997b. Tongass National Forest Land and Resource Management Plan. R10-MB-338dd. USDA Forest Service, Alaska Region. 1997.
- Woodbridge, B., and C. D. Hargis. 2006. Northern goshawk inventory and monitoring technical guide. USDA Forest Service, Washington Office, Gen. Tech. Rep WO-71. 84 pp.

**Responses to USDI – Doug Mutter (for Pamela Bergmann), United States Department of the Interior, Office of Environmental Policy and Compliance**

**USDI-1** – Your recommendation to implement the interagency proposed Old Growth Reserves (OGRs) and to maintain connectivity is supported in the DEIS and FEIS. The Interagency proposed OGRs were proposed for all of the action alternatives. Connectivity was addressed and the action alternatives meet Forest Plan Standards and Guidelines. The Forest Plan Amendment adopted the interagency recommendation for OGRs for the Iyouktug project area.

**USDI-2** – Although we considered your recommendation to maintain 500 acres of forest habitat around the goshawk nest sites to maintain the post-fledging area, this exceeds what is required in the Forest Plan. The goshawk nests are currently buffered to meet Forest Plan Standards and Guidelines. The goshawk buffers maintain a minimum of 84 percent (122 acres) of the average post-fledging area (146 acres) as defined in the reference that you provided..

**USDI-3** – Your recommendation to inventory and monitor goshawk nest sites is supported in the DEIS and FEIS, Chapter 2, Monitoring, Project-specific Monitoring section. This section states that goshawk nests will be surveyed to assess activity and location before harvest activities occur. A discussion of the survey method is in the Wildlife Resource Report.

**USDI-4** – Your recommendation to modify harvest methods to maintain important deer winter range and corridors has been noted. Please see response to BC-5 for information on the range of alternatives developed to address the issues. Alternative 3 was developed to minimize impacts to deer habitat and connectivity by dropping units or portions of units in lower elevation winter habitat.

**USDI-5** – Chapter 1 of the DEIS and FEIS address and support the information you cite on encumbered lands. Please see response to BC-25 for information on how the cumulative effects analysis was completed.

**USDI-6** – Thank you for providing information on the National Bald Eagle Management Guidelines. Although there are no bald eagle nests currently identified within the areas of proposed activities, if active nests are identified in areas of proposed activities, the Bald Eagle MOU between the Forest Service and the Fish and Wildlife Service will be followed.

**USDI-7** – Your recommendation that forest owls be considered in the analysis was considered. Although the owls were not addressed as a specific issue in the analysis, the habitat for this species was addressed. The analysis addressed the effects to productive old growth forest (refer to the DEIS and FEIS, Habitat Connectivity and Old Growth Reserve section) and habitat for the goshawk (refer to the DEIS and FEIS, Threatened, Endangered, Petitioned, and sensitive Wildlife Species section), marten, migratory birds' and endemic species (refer to the DEIS and FEIS, Management Indicator Species (MIS) and Other Wildlife Species section) that use similar habitats to the owl or provide prey for this species. The Forest Plan Standards and Guidelines for Raptor Nest Protection will be applied to active owl nest sites.

**USDI-8** – Thank you for providing information on the marbled murrelet. Although the marbled murrelet was not addressed as a specific issue in the analysis, the habitat for this species was addressed. Murrelets generally occur in near shorewaters (usually within 3 miles of the shoreline) and prefer forested habitat for nesting. Therefore, the analysis addressed the effects murrelet habitat including to productive old growth forest (refer to the DEIS and FEIS, Habitat

Connectivity and Old Growth Reserve section) and habitat for the goshawk, osprey, trumpeter swan, Vancouver Canada goose (refer to the DEIS and FEIS, Threatened, Endangered, Petitioned, and sensitive Wildlife Species section) and migratory birds' that use similar habitats to the murrelet (refer to the DEIS and FEIS, Management Indicator Species (MIS) and Other Wildlife Species section). Proposed activities will not occur within 1 mile of the shoreline and the DEIS and FEIS (and the Wildlife and Subsistence Resource Report), defines the effects to productive old growth forest. If any murrelet nests are identified during project activities, the Forest Plan Standards and Guidelines for the Marbled Murrelet will be applied.

**USDI-9** – Please see responses to SCS-160 and 161.

**Responses to Comments****Appendix B****Wanda J. Culp P.O. Box 51, Hoonah, Alaska 99829****907-945-3352**

November 12, 2007

Alaska Congressional Delegation and  
Other Members of Congress  
Washington, D.C.

RECEIVED NOV 16 2007

**RE: Iyouktug Timber Sale on N.E Chichagof Island, Sealaska Corporation's Lands  
Bill, and Title VIII Protections on ANCSA private lands.**

To All This Concerns, - *Hoonah Ranger*

WC-1 The Alaska Native cultures need protection from the huge impacts of logging, mining and oil/gas development across Alaska. The Alaska Federation of Natives is working towards creating a law that will extend federal customary and traditional use protections to our own lands under the Alaska Native Claims Settlement Act (ANCSA) now under State of Alaska jurisdiction. This effort needs the serious attention and positive action of the U.S. Congress.

I live in the Tlingit village of Hoonah, Alaska and am a Sealaska Corporation and Huna Totem Corporation Shareholder. Hoonah is literally surrounded by private Tlingit-owned land where the Alaska State Troopers and local "public safety" city police have joined forces in reducing our hunting and fishing rights on our own land through confiscation of equipment and issuance of court citations that usually end up in fines and probation.

It is past time that our ANCSA corporations face the village issues and join in a positive and just resolve. The steel gates that have barred us from the best hunting, fishing and gathering sites - while those well off enough go around those gates on their 4-wheelers to "sport" hunt and fish - need to be opened to us as the initial land owner interest holders. State of Alaska law considers all Alaskans to be "subsistence" users while Hoonah customary and traditional users are entrapped into State court with no due process. This makes a sham out of the ANCSA settlement and ANILCA Title VIII so-called protections.

The federal law, ANILCA Title VIII that protects customary and traditional use and cultural existence pertains only to public federal lands, not to the state privately-owned ANCSA lands. There is 15,000 miles of coastline and 45,000 miles of rivers and streams in S.E. Alaska's Tongass National Forest managed by the SOA/ U.S. Forest Service with checkerboard federal-state dual-management that is harming not only the human element but the wildlife and pre-established ecosystems within our very midst. Our traditional way of life has been successfully squeezed out of the picture by federal, state and private land managers on all those miles of rivers, streams and coast lines.

A half-century of federally subsidized logging and road-building has destroyed roughly a million acres of S.E. Alaska's richest and irreplaceable old growth. The Tongass is the only national forest nationwide where commercial logging is allowed in roadless areas. The current logging level targeted by the USFS is more than five times the average annual logging over the past 15 years. And, this logging is heavily subsidized by taxpayers, approx. \$40 million annually and about \$1 billion since 1982.

## Appendix B

## Responses to Comments

WC-1  
(cont.) Sealaska currently owns 290,000 acres of S.E. Alaska of promised the 375,000 from ANCSA, 67,110 of those acres surround Hoonah (21,636 being Huna Totem land). As with federal public lands, ANCSA state lands have been aggressively logged in the past 25 years, with much less environmental consideration than required federally. Much needs to be done to mitigate the destruction left behind all around Hoonah's traditional use area. Corporate land managers and planners must begin looking at sites identified as sacred or historic under ANCSA as important to our living culture for continued use.

All land managers and planners must consider the cumulative effects of their past actions and policies on both federal (U.S. Forest Service) and state lands (Sealaska and Huna Totem Native Corporations) around Hoonah, for instance. It is time to scrap the steam-rolling agendas moved by overly aggressive industries that move in and move out with no thought to what is left behind socially or economically. Federal agencies must smash their old "industry first" priority template and begin recognizing the significance of a healthy ecology to all living things into the future.

Alaska Native cultures are ecologically friendly and considerate of all living things. Because it is our nature not to waste anything we harvest, we are not a threat to any other user groups within our midst. We seek a healthy balance in the use of our natural resources, a balance that should be built into any and all management plans.

Thank you for hearing me out with your capable ears.

Very Sincerely Yours, Wanda J. Culp *Wanda*

Attached map of Hoonah vicinity

Cc: SE Alaska Conservation Council

Sealaska Corporation

Huna Totem Corporation

USFS, Hoonah Ranger, re: Iyouktug harvest plan on N. Chichagof Island

**Responses to WC – Wanda Culp**

**WC-1** – Many of the points raised in your comments on the Iyouktug Timber Sale project are addressed at the forest planning level. Forest plans are programmatic in nature; they do not authorize activities such as timber harvest or road building that affect the environment, but the Tongass Forest Plan does provide critical protection for the habitat that supports hunting, fishing and other traditional uses with management direction. The goals and objectives in the Forest Plan ensure the sustainability of the Tongass National Forest and the ecological, social and economic values derived from the forest. The land use designations provide expectations and limits on how and where activities can be conducted. The standards and guidelines in the Forest Plan regulate how projects, such as timber harvest and road building, can occur with resource protection. It is under all this higher-level management direction that the Iyouktug project is planned. Where laws, such as ANCSA and ANILCA, apply to the Iyouktug project, they are discussed in the Iyouktug DEIS and FEIS (see Chapter 1, Non-National Forest System Lands, and Applicable Laws and Executive Orders, and Chapter 3, Subsistence section, and Findings and Disclosures).

The 2008 Tongass Forest Plan has several new goals added to maintain viable plant communities and populations and a mixture of habitats capable of supporting the full range of naturally occurring plants. It also includes a new goal to consult with Tribes to protect and maintain sacred sites across the Forest. The fish and riparian standards and guidelines and comprehensive wildlife conservation strategy in the Tongass Forest Plan ensure the maintenance of viable populations of animals. The system of large, medium and small old-growth reserves protects much of the existing productive old-growth habitat on the Tongass. Together, the old-growth habitat reserves and standards and guidelines protect 91% of the existing productive old-growth habitat on the Tongass. All of this is part of the cumulative effects analysis that was done at the broader forest-wide scale, under which the project effects analysis for Iyouktug now takes place. Relative to the Iyouktug Timber Sales, the IDT analyzed cumulative effects; analysis was done at a scale appropriate for each resource (please see response to BC-25 for more information).

Work with the Hoonah Indian Association resulted in an area of concern being dropped from the Iyouktug project area (FEIS, Chapter 3, Heritage, pg. 3-65). Subsistence and traditional and cultural uses of the area were important considerations, especially the habitat connectivity and Old Growth for the Sitka black-tailed deer, which was one of the driving issues in the analysis that resulted in Alternative 3 being developed to reduce the impacts to deer habitat and connectivity as much as possible.

Concerns about protecting roadless areas was another driving issue in the Iyouktug analysis that resulted in Alternative 4 being developed to have no further impacts on the roadless areas. Using issues to develop different alternatives helps show the trade-offs of the decision that will be made. These are among the many factors the Forest Supervisor will consider when he decides how to best balance the needs and uses of the natural resources within the Iyouktug project area, under the broader considerations already made in the Tongass Forest Plan.



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