



Alaska Trollers Association

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Jim Scholl
State of Alaska, Department of Transportation
Box 112506
Juneau AK 99811-2506

RE: Haines Highway Environmental Analysis

Dear Mr. Scholl:

The Alaska Trollers Association (ATA) offers the following comments on Alaska Department of Transportation and Public Facilities' (DOT & PF) Environmental Assessment (EA) regarding proposed improvements to the Haines Highway from Milepost (MP) 3.5 to 25.3.

ATA represents hook and line fishermen in Southeast who primarily target Chinook and coho salmon. With over 2,000 troll permit holders, our fishery ranks among the largest in the state and is 86% resident. Most trollers reside in the Southeast region and a large number live in small coastal communities, including Haines. Nearly one out of every 35 people in our region works on the back deck of a troll boat.

Chilkat River provides an important component of the season's harvest for our fleet and many others. As such, we are concerned about any development activity that has the potential to negatively impact critical habitat and the abundance of wild salmon. Our comments will concentrate on three areas: public process, protection of Chilkat River salmon, and the value of those fish to Haines and other Southeast Communities.

Public Process

In reviewing the EA and past documents it becomes quickly apparent that DOT & PF have held numerous public meetings and listening sessions since 2005. However, given the length of time involved, it is likely that many people either weren't ever aware of these meetings, or stopped paying attention due to the long project time delays. In fact, this association has only known about the EA for a few days, and it is the heart of fishing season. Our members have not had adequate time and notice to review the documents. To my knowledge, no outreach was made to commercial fishing organizations.

Given the potential for negative impacts, I suggest that the comment period for the EA should have been longer and scheduled during a timeframe when more fishermen were available to comment.

Environmental Impact Statement v. Environmental Assessment

The Chilkat River supports immense fish and wildlife values, important for their own merit, but also relied on heavily by residents of Southeast Alaska. This large scale project spans over 20 miles of critical habitat. An EIS could have better fleshed out the broad ramifications of this project. Typically, federal NEPA reviews consider human impacts an important part of the equation:

The agency must analyze the full range of direct, indirect, and cumulative effects of the preferred alternative, if any, and of the reasonable alternatives identified in the draft EIS. For purposes of NEPA, "effects" and "impacts" mean the same thing. They include ecological, aesthetic, historic, cultural, economic, social, or health impacts, whether adverse or beneficial. It is important to note that human beings are part of the environment (indeed, that's why Congress used the phrase "human environment" in NEPA), so when an EIS is prepared and economic or social and natural or physical environmental effects are interrelated, the EIS should discuss all of these effects.^{1 2}

DOT & PF obviously considered some of the human impacts in its documents. However, the very nature of an EA effectively leaves out opportunity for full discussion of the thousands of people and multiple communities that rely on healthy Chilkat River salmon for their sustenance and livelihood. There appears to be no mention of the seafood industry in the planning documents, so I offer a few facts for the record.

Economics of Salmon to the Region

The value of the local seafood industry, particularly as it relates to Southeast jobs and income in our small communities must not be underestimated. In most towns there are few other options for work. ***Salmon produced in the Chilkat River are harvested by commercial, sport, and subsistence fishermen, particularly those who fish from Cape Spencer to Haines.*** When you add in the processing and support sectors, the value of these fish quickly expands. Maintaining access to healthy wild salmon populations across the region proves vital to securing the economic and social well-being of a great many people and businesses. So, while Haines is an important town to consider for this decision, it should not be the only town considered.

Nearly 3,000 **Southeast Alaska** resident permit holders and 1,800 resident crew members fish our region each year. In 2011, they were paid \$215 million, while the processing sector paid resident workers \$22 million in payroll. Between 2007-2011, the Southeast seafood industry contributed over \$36 million in landing taxes to both the state and local communities. Fisheries are interconnected for both fisherman and processor; reductions in any aspect can dramatically affect the whole operation.

The **Haines Borough** is home to 114 commercial fishing permit holders and 86 deckhands, most of whom fished in 2011. That year, 80 commercial fishing vessels were home ported in Haines and that fleet took home \$7.5 million in ex-vessel wages. It took 448 processing workers to handle the fish

¹ A Citizen's Guide to the NEPA, p. 22 http://ceq.hss.doe.gov/nepa/Citizens_Guide_Dec07.pdf

² CEQ NEPA Regulations, 40 C.F.R. §§ 1508.7, 1508.8, § 1508.14.

landed in Haines and those workers took home \$3.8 million in wages. The Haines Borough and the State of Alaska both made over \$122,600 in landing taxes for that year's catch. Haines ranked 63rd amongst the top 100 U.S commercial fishing ports in 2011.

Many **Juneau area** fishermen fish in Lynn Canal or other areas where Chilkat River fish transit. In 2011, the Juneau Borough was rated the 46th US Fishing Port. 738 commercial fishing vessels were home ported in Juneau, operated by 800 permit holders and crew who earned \$26.4 million. Nearly 500 processing workers made \$4.5 million that year. The state and borough each added to the coffers \$430,500 in landings revenue.

Commercial fishing families rely on health salmon populations in the Chilkat River and the vast majority of them plug their earnings right back into Southeast communities. In addition, salmon fishing by sport, personal use, and subsistence fishermen heavily contribute to the social and economic fabric of Southeast.

Many commercial fishing openings and closures hinge on the health of Chilkat salmon, because that system is considered an 'index stream'. There are times that all or part of the troll fishery must close, or can't be extended, due to apparent weakness of the Chilkat coho runs. Seiners and gillnetters are regularly managed on the strength of Chilkat River runs.

Chilkat River Salmon Critical Habitat

Salmon are the lifeblood of many Alaska communities. Alaska has put a tremendous amount of money and energy into protecting habitat, researching salmon stocks, and managing fisheries. This commitment should be furthered through sound development decisions, made with an eye towards maintaining a sustainable environment for fish and wildlife and those who live, work, and recreate in the region.

ATA urges the DOT & PF to continue and enhance its collaboration with the Alaska Department of Fish and Game (ADFG) and Chilkat River stakeholders on all remaining planning and permitting issues.

It is essential that there be meticulous permit reviews of the Haines Highway project. Additional monitoring and mitigation of unanticipated outcomes should be built into the terms of the permit and occur on an ongoing and scheduled basis long after all construction phases are complete.

ADFG should be directly involved in assisting DOT & PF with design and placement of any structure or water feature that could impact salmon passage, spawning, and rearing. For instance, ADFG should assist in the selection of culverts, to ensure appropriate size and depth to accommodate variable water levels and the range of salmonid life stages.

The rip rap discussed for some of the project areas seems inappropriate for rearing. Technology is available, and should be employed, which can better mimic a natural riparian environment. Important trees should be preserved to ensure proper shading, water temperatures, and woody debris. ADFG is rightly placed to make recommendations for these aspects.

Important to the seafood industry and other harvesters will be securing fish wheels and access to sites currently utilized by ADFG to evaluate salmon production and seasonal run size. The indexes derived

from these data are essential to the sustainable management of our fisheries. As noted above, these indexes are directly relevant to the conduct of our fisheries.

Finally, it is apparent that DOT & PF intends to improve various infrastructure and streamside areas along the road, which are currently failing or otherwise have potential to harm salmon. We applaud those intentions and only stress again our desire to see a close working relationship between ADFG and DOT & PF, to ensure that fish and wildlife values are adequately protected.

In conclusion, ATA urges your diligent commitment to protect instream and shoreside habitat and water quality in the Chilkat River, both during the construction phase of this project and beyond. Properly caring for, and sustaining, healthy and productive fish and wildlife populations in the Chilkat River drainage will provide intrinsic value and economic opportunity for Haines and Southeast residents for many years to come. We can't afford to see mistakes made in a preserve area simply to straighten and widen one of the gems of the scenic highway system.

If I can answer questions regarding ATA's position on this or other related issues, please don't hesitate to contact me.

Sincerely,

Dale Kelley
Executive Director