

From: **Upper Lynn Canal Fish and Game Advisory Committee**

Date: October 9, 2025

To: Alaska Department of Natural Resources
Division of Mining, Land and Water
Southeast Regional Land Office
PO Box 111020 | Juneau, Alaska 99811-1020
Attn: **Muriel Walatka** Natural Resource Specialist | Permits and Material Sales

Re: **NOTICE TO THE PUBLIC AND REQUEST FOR INFORMATION**
LAS 35438
NSEA TIMBER, INC

By a unanimous vote, the Upper Lynn Canal Fish and Game Advisory Committee is opposed to this 5-year Land Use Permit to authorize the use of state-owned tide and submerged lands for a temporary Log Transfer Facility, Log Storage Area, and a Ship Moorage Area, applied for by NSEA TIMBER, INC. Our reasons are delineated below:

Sited at the head of Chilkoot Inlet, Lutak Inlet is perhaps the most critical component of the Lynn Canal ecosystem. The Lutak Inlet estuary plays a vital role in supporting a diverse range of aquatic species and serves as an important habitat for their survival and reproductive success.

Chilkoot/Lutak supports runs of all 5 species of salmon. These runs are currently struggling. The escapement of sockeye into Chilkoot River this year, 2025, was below the minimum escapement goal. The pink salmon return was also low. The log transfer facility, log storage facility and ship moorage facility will definitely have a negative impact on these fish. Criteria for granting this permit states that "No activity may substantially disrupt the necessary life cycle movements of those species of aquatic life indigenous to the waterbody, including those species that normally migrate through the area, unless the activity's primary purpose is to impound water."

The intertidal and nearshore area of Lutak Inlet is a sensitive habitat. Not only for salmon runs, but also bottom-dwelling species that are important to both subsistence and commercial fisheries. These include shrimp, crab, and halibut. These species provide an essential source of food security as well as cultural continuity for local residents who rely on the Inlet for subsistence harvests. Any degradation of these habitats would directly impact the community's ability to access traditional and sustainable food resources.

The proposed facilities would directly interfere with both subsistence and commercial salmon fishing in Lutak Inlet. The project would exclude drift netting along at least 3,000 feet of shoreline—and likely more once mooring buoys are installed—significantly reducing access for both subsistence and commercial gillnet fishermen. The commercial salmon, shrimp, and Dungeness crab fisheries in Lutak Inlet alone generate an average annual ex-vessel value of approximately \$260,000. Approval of this project would jeopardize these fisheries and could severely impact the economic stability of our small, already struggling community.

The application contains no reference to the potential impacts on adult salmon migratory patterns, the seasonal presence of millions of juvenile salmon that outmigrate along the shores of Lutak Inlet, the migration of eulachon into the Inlet, or the outmigration of juvenile eulachon. Each of these life stages is critical to the survival of these species. The proposed log transfer, log storage, and ship moorage facilities would inevitably affect these fish populations and their habitats, both directly and indirectly, through increased vessel traffic, noise, pollution, and physical disturbance.

The eulachon, a smelt species with deep historical and contemporary significance to the local community, also migrate through the Inlet. The Lynn Canal eulachon may represent one of the strongest remaining eulachon runs left in the Pacific Northwest. Eulachon are known to be highly sensitive to human disturbance. Unlike salmon, which return to their natal streams, eulachon utilize a range of local rivers, selecting among them based on environmental conditions. Increases in industrial activity or physical changes to the shoreline may cause eulachon to abandon Lutak Inlet and the Chilkoot River altogether. Such a loss would have far-reaching ecological and cultural consequences—affecting people, terrestrial and marine mammals, bird populations, and on the broader marine ecosystem of which they are an essential component.

Until clear and scientifically supported answers are provided to the Alaska Department of Fish and Game regarding how the applicant's activities will affect the above - mentioned marine species and habitats, this permit should not be granted.

Sincerely,

Adam Smith
Chair— Upper Lynn Canal Fish and Game Advisory Committee

CC: Harriet Brouillette, Chilkoot Indian Association
Brian Willard, Chilkat Indian Village
Senator Jesse Kiehl
Representative Andi Story
Tom Morphet, Haines Borough Mayor
Patty Brown, Haines Borough Planning Commission Chair
Molly Zaleski, NOAA Habitat Conservation
Kate Kanouse, ADFG Habitat
Nicole Zeiser, ADFG Commercial Fisheries
Greg Palmieri, DNR Forestry