



ALASKA INTER-TRIBAL COUNCIL
Advocating for Tribal Governments Across Alaska

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27 October 2005

Mr. Kurt Fredriksson, Commissioner
Alaska Department of Environmental Conservation
410 Willoughby Avenue, Suite 303
Juneau, Alaska 99801

Re: Klukwan, Inc. aerial pesticide spraying permit application—attention also to Sandra Woods

Dear Commissioner Fredriksson:

The Alaska Inter-Tribal Council (AITC) opposes the issuance of a permit to Klukwan, Inc./Long Island Trust for the aerial application of herbicides on 2,000 acres of Long Island in southeast Alaska. AITC supports the federally recognized tribes who have passed resolutions that oppose the aerial spraying of herbicides, including Hydaburg Cooperative Association, Organized Village of Kake, Yakutat Tlingit Tribe, Craig Community Association, and others. The State of Alaska must respect the resolutions and authority of the federally recognized tribes in their consistent opposition to the aerial herbicide spraying. We submit this letter to be considered formally and entered into the public record.

Tribes are justifiably concerned that herbicidal chemical applications will have detrimental effects on the health of Alaska Native people who rely on clean water and the safety of traditional foods. Tribes have a responsibility to pass on to future generations a world with water that is pure to drink, oceans and lakes that are safe for human use and aquatic habitat, and healthy forests that support our Customary and Traditional lifestyle. Aerial spraying of pesticides is counterproductive to promoting such a world. The State of Alaska must defer to the tribes in this matter and respect the concerns and knowledge of the local Native people who use these lands and waters for the traditional harvesting of berries, medicinal plants, fish, and wildlife.

Klukwan, Inc. proposes to spray a chemical mixture of herbicide products, Accord (active ingredient is glyphosate), Arsenal (active ingredient is imazapyr), with two additional chemicals including In-Place and Competitor. The herbicides glyphosate and

imazapyr are associated with a range of adverse health effects. The permit application does not address the potential for additive, cumulative, and synergistic effects of the chemical mixture. The permit application fails to consider the effects of the herbicidal chemical mixture on subsistence foods and the health of Alaska Native people who are dependent on the safety of traditional foods. ADEC is relying on EPA's pesticide registration risk assessment process which does not account for the much larger quantities of fish and other subsistence foods that Southeast Alaska Native people consume compared with the general population in the lower-48. Furthermore, aerial spraying of pesticides is inherently inaccurate with a high risk of drift contamination of wetlands, salmon streams, and traditional harvest areas. The drift model is overly simplistic and is not sufficiently predictive given the dynamic weather and mountainous terrain. Therefore, proposed buffer zones will not ensure protection of salmon-bearing streams, water sources, subsistence use areas, eagle nesting habitat, and other sensitive areas.

As a matter of policy, tribal governments have determined that use and broadcast spraying of herbicides as a silvacultural "treatment" is detrimental to land, water, air, as well as fish and wildlife that Alaska Native people use in their daily lives. The Alaska Department of Environmental Conservation must deny the permit application of Klukwan, Inc. to aerially spray herbicides. The agency must require the corporation to use non-chemical mechanical alternatives that are both prudent and economical.

Thank you for your consideration of the comments of the Alaska Inter-Tribal Council.

If you have concerns about this permit application, please contact Sandra Woods at the DEC. She can be reached at:

E-mail: swoods@dec.state.ak.us (Subject: Klukwan Aerial Permit)

Fax: (907) 269-7600

Mail: ADEC Pesticide Program; Attn: Sandra Woods,
555 Cordova St.
Anchorage, AK 99501

Sincerely,


Steven E. Sumida
Deputy Director
Alaska Inter-Tribal Council