



SOUTHEAST ALASKA SUBSISTENCE  
REGIONAL ADVISORY COUNCIL  
Meeting Materials

*March 24-26, 2020*  
*Juneau*





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USFS Photo

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**SOUTHEAST ALASKA SUBSISTENCE REGIONAL ADVISORY COUNCIL**

Central Council Tlingit & Haida – Elizabeth Peratrovich Hall  
320 W. Willoughby Ave., Conference Room #2  
Juneau, Alaska

March 24 – 26, 2020  
convening at 9:00 a.m. daily

**TELECONFERENCE:** call the toll free number: **1-866-560-5984** , then when prompted enter the passcode: **12960066**

**PUBLIC COMMENTS:** Public comments are welcome for each agenda item and for regional concerns not included on the agenda. The Council appreciates hearing your concerns and knowledge. Please fill out a comment form to be recognized by the Council chair. Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule.

**PLEASE NOTE:** These are estimated times and the agenda is subject to change. Contact staff for the current schedule. Evening sessions are at the call of the chair.

**AGENDA**

\*Asterisk identifies action item.

- 1. Invocation**
- 2. Call to Order** (*Chair*)
- 3. Roll Call and Establish Quorum** (*Secretary*).....4
- 4. Welcome and Introductions** (*Chair*)
- 5. Review and Adopt Agenda\*** (*Chair*) ..... 1
- 6. Election of Officers**
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- 7. Review and Approve Previous Meeting Minutes\*** (*Chair*) .....5
- 8. Reports**
  - Council Member Reports
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- 9. Service Awards**
- 10. Public and Tribal Comment on Non-Agenda Items** (*available each morning*)
- 11. Old Business** (*Chair*)

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<b>15. Closing Comments</b>	
<b>16. Adjourn (Chair)</b>	

To teleconference into the meeting, call the toll free number: **1-866-560-5984**, then when prompted enter the passcode: **12960066**.

*Reasonable Accommodations*

The Federal Subsistence Board is committed to providing access to this meeting for

all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to DeAnna Perry, 907-586-7918, [dlperry@fs.fed.us](mailto:dlperry@fs.fed.us), or 800-877-8339 (TTY), by close of business on March 10, 2020.

**REGION 1**  
**Southeast Alaska Subsistence Regional Advisory Council**

<b>Seat</b>	<b>Year Appointed <i>Term Expires</i></b>	<b>Member Name and Community</b>
<b>1</b>	<b>2019</b>	<b>VACANT</b>
<b>2</b>	<b>2019</b>	<b>VACANT</b>
<b>3</b>	<b>2019</b>	<b>VACANT</b>
<b>4</b>	<b>2019</b>	<b>VACANT</b>
<b>5</b>	<b>2019</b>	<b>VACANT</b>
<b>6</b>	<b>2013 2020</b>	<b>Robert F. Schroeder</b> Juneau
<b>7</b>	<b>2014 2020</b>	<b>Albert H. Howard</b> Angoon
<b>8</b>	<b>2002 2020</b>	<b>Donald C. Hernandez</b> Point Baker <span style="float: right;"><b>Chair</b></span>
<b>9</b>	<b>2018 2021</b>	<b>Ronald Leighton</b> Thorne Bay
<b>10</b>	<b>2018 2021</b>	<b>Harold D. Robbins</b> Yakutat
<b>11</b>	<b>2010 2020</b>	<b>John A. Yeager</b> Wrangell
<b>12</b>	<b>2018 2021</b>	<b>Larry R. Bemis, Jr.</b> Yakutat
<b>13</b>	<b>2009 2021</b>	<b>Cathy A. Needham</b> Juneau <span style="float: right;"><b>Vice-Chair</b></span>



## SOUTHEAST SUBSISTENCE REGIONAL ADVISORY COUNCIL

### Meeting Minutes

Cape Fox Lodge

Ketchikan

November 5 – 7, 2019

#### Invocation:

Lee Wallace, President of the Organized Village of Saxman, gave an invocation before the meeting.

#### Call to Order, Roll Call, and Quorum Establishment:

The meeting was called to order Tuesday, November 5, 2019, at approximately 8:40 a.m. Council members Elijah Winrod, Frank Wright Jr., Mike Douville, Harvey Kitka, Bob Schroeder, Don Hernandez, Ronald Leighton, Harold Robbins, John Yeager, Larry Bemis Jr., and Cathy Needham were present in person. Due to a weather delay, Council member Patty Phillips physically joined the Council on the second day. Council member Albert Howard was not present and was excused. With 12 out of 13 seated Council members present, the quorum was established.

#### Attendees:

##### *In person:*

- *Office of Subsistence Management (OSM), Anchorage:* Orville Lind, Scott Ayers, Greg Risdahl, Pippa Kenner
- *U.S. Forest Service (USFS), Anchorage:* Tom Whitford; *Juneau:* Melinda Burke, Raeanna Wood, Chad VanOrmer; *Ketchikan:* Frank Sherman, John Autrey, Jon Hyde, Emily Jackson, Robert Lynn, Ben Limle, Susan Howle; *Sitka:* Justin Koller, Terry Suminski; *Washington, D.C.:* Chris French
- *Bureau of Indian Affairs, Anchorage:* Pat Petrivelli
- *Alaska Department of Fish & Game (ADF&G), Sitka:* Ross Dorendorf; *Juneau:* Tom Schumacher
- *Organized Village of Saxman:* Lee Wallace
- *Alaska Native Brotherhood:* Richard Jackson, James \_\_\_\_\_, Sr.
- *Ketchikan Indian Community:* Gloria Burns, Tony Gallegos, Randy Williams, Irene Dundas, Cynthia Haven, Sam Navtokas
- *HCA:* Toni Bitonti
- *University of Alaska Southeast (UAS) /Sitka Community Schools:* Heather Bauscher
- *UAS / Sitka High School:* Tava Guillory, Darby Osborne, Adelaide Poulson, Cora Dow
- *Southeast Alaska Conservation Council (SACC):* Gabriel Canfield, Heather Evoy, Dan Cannon
- *Public, Ketchikan:* Norman Areola, Donald Westlund, Matt Allen, Loren Stanton, Shania Murphy, Gianna Willard \_\_\_\_\_, Diane Willard
- *Public:* Eric Stone, James Lee Stuck

***Via teleconference:***

- *OSM, Anchorage:* Lisa Maas
- *National Park Service (NPS), Anchorage:* Joshua Ream
- *USFS, Craig:* Jeff Reeves; *Yakutat:* Susan Oehlers; *Sitka:* Robert Cross
- *ADF&G, Juneau:* Ryan Scott; *Palmer:* Mark Burch

**Review and Adopt Agenda:**

Motion by Mr. Wright, seconded by Mr. Kitka, to adopt the agenda with the following changes:

- Add ADF&G Wildlife Management Implementation Report to “Old Business”
- Move presentation of Service Award to around 1 p.m., just before the roadless presentation
- Schedule a specific time for presentation by Roadless Team (set for 1 p.m. Tuesday)
- Add Action Item under “Old Business” to discuss/act on drafting a Public Comment Letter on the Alaska Roadless Rulemaking issue
- Move WP20-16/17 to be the first Wildlife proposal due to availability of a biologist
- Remove NPS Regional Report as no one will be available on Nov 7 to present a report

Motion passed unanimously.

**Review and Approve Previous Meeting Minutes:**

Motion by Ms. Needham, seconded by Mr. Kitka, to approve the winter 2019 meeting minutes with the following modifications: On Page 4, remove verbiage under Mr. Bemis’s member report about the community purchasing a camera. Motion passed unanimously.

**Council Member and Chair Reports:**

*John Yeager of Wrangell* reported concerns about wild and hatchery salmon stocks and the community doubts their ability to support households or livelihoods with salmon. Subsistence Sockeye season was shut down two weeks early and, combined with no directed subsistence fishery for King Salmon on the Stikine River, some households did not get adequate Sockeye for the upcoming winter. There is a growing concern about the over-fishing of halibut in the subsistence program. Concerns continue with transboundary mining. The decisions made on the Roadless Rule and the Central Tongass management plan could affect the wilderness areas directly used for subsistence in the Wrangell area. This past year showed a great berry harvest season and, currently, deer hunting seems to be going well in the area.

*Larry Bemis of Yakutat* reported a change in fisheries resulting in poor escapement numbers in most of the streams. The Situk River had a good show of Sockeye, King, and Coho salmon. There has been an increase in Sockeye; however, their run pattern has not been normal for the last four to five years. Extreme temperatures were experienced this summer and water temperatures in the ocean were affected. Fish stayed in the deep waters and didn’t school up and feed off shore before going into the river as usual. The moose hunting season was open earlier and was long and allowed more people to participate. This resulted in the area not having nearly the pressure as previously experienced.

*Elijah Winrod of Klawock* reported that the deer population is a hot topic on Prince of Wales Island. Few deer and many wolves are observed in the area, which creates a concern that deer populations are headed in a poor direction. Salmon have been on a decline. Mr. Winrod's brothers are seiners who informed him that because there was no rain in the Cordova Bay area the fish were not up in the bay by the stream, leading them to believe that it had been over-fished before the fish had a chance to get close to the stream.

*Harold Robbins of Yakutat* reported that the Klukshu River had an extremely abundant escapement. The Sockeye and King salmon run exceeded the upper limits by almost double. The temperature of the water may have made the difference as the Klukshu River is an ice water river. Moose hunting is still open and 20 of the 30 animals have been harvested.

*Robert Schroeder of Juneau* reported continued resource depletion and that each year it becomes more difficult to harvest fish, to the extent that the King Salmon derby is something of a historical note at this moment. Likewise, there is a very poor ability to harvest Coho Salmon, and people who get Sockeye Salmon would most likely go to the directed personal use fishery at Sweetheart Creek. King Crab harvest has been mostly closed for quite a few years. Suspected causes include climate crises affecting all fish resources, including halibut, and cruise ship industrial tourism, which creates a demand on resources. Mr. Schroeder is concerned whether data and information used in proposal analyses are current, as studies cited were done 30 years ago. The Council needs to have solid data that compliments traditional ecological knowledge and knowledge from communities to do its regulatory work. Tribal governments have a much greater capacity to document current subsistence use patterns. There is a concern about cutbacks that limit the State and Federal management of natural and subsistence resources.

*Harvey Kitka of Sitka* reported that Sitka continues to experience problems with the herring fishery and is concerned about the depletion of this forage fish. In Sitka Sound they no longer see the big fish that are traveling throughout Southeast Alaska. Now, one must get out to the 100 fathom area and Gulf of Alaska to find the bigger fish. There is a concern about the commercial fishermen 'shaking' small King Salmon from the net and increasing the risk of mortality. The Sitka Tribe is supporting the residents of Kake and Prince of Wales Island on the Roadless Rule issue; however, some people in the Tribe believe there are opportunities for kids and grandkids to work in the forest. Observations of climate change were more drastic this year and a lot of the streams dried up and the salmon couldn't come in. A lot of fish died sitting in the ponds waiting to get up the river to spawn. Abalone are starting to show up again.

*Cathy Needham of Juneau* reported that for the last four years, waters in Hetta Creek were warm and very low, and it is believed that this is causing fish to hold off shore. This resulted in a complete change in run timing for salmon in that creek, and it is pushing subsistence harvesters to other systems, further away from their communities. For three years, there has been no harvest of Sockeye Salmon out of the Eek system because of low escapement. Congress appropriations and contributions from the area tribes made it possible to collect water quality monitoring data in the region, including gathering information on the transboundary rivers. The groundwork and data collected will be important for understanding the potential threats to water bodies across the region. Ms. Needham has worked with tribal cooperating agencies and local tribal governments on trying to effectively understand the Roadless Rulemaking

process. Everyone is looking forward to hearing testimony at the upcoming subsistence hearings. That information can help produce effective comments during the comment period.

*Michael Douville of Craig* reported that there are less deer on Prince of Wales Island and that it is taking a lot of effort for hunters to harvest deer. He has a concern about the upcoming wolf season because, even though it will be more liberal, there doesn't seem to be a good reason for the count going down by 60 wolves. The biggest concern is the Roadless Rule. All tribes are against overturning the Roadless Rule, and it is believed that the core old growth area in Unit 2 is necessary to provide deer habitat and other subsistence resources such as bark and firewood.

*Patricia Phillips of Pelican* reported that several Black Cod fishermen told her that cruise ships are affecting their livelihood by discharging sewage water within three miles from shore, which was evident after gear inspection. She shared her observations of the coast from Pelican to Esther Island and reported that there were good showings of deer. The rebounding deer population may be due to the less severe winters in the area. There are a lot of bears. Some of the streams had low returns of salmon, so the bears were eating grasses and vegetation, or chasing after deer until they could feed on fish around the end of July. Due to the poor returns of Sockeye Salmon in some of the streams, subsistence fishermen had to fish in different systems. Some of the streams had abundant returns but there was heavy competition with the charter boat fleet.

*Frank Wright, Jr. of Hoonah* reported that for the last two years rainfall has been less than usual and the rivers have been dry so the salmon were not getting up into the rivers. In addition to the effects of half a million cruise ship tourists expected in his community next year, of grey water in fishing areas, and building structures in the community to accommodate the people, he is concerned about effects on the tribal existence of the Hoonah people. Altering the beach will change the people of Hoonah who depend upon it because it is taking away a part of their culture. Fishing was so bad last year that there was a disaster relief fund created; however, the amount of money that will be received will not even pay a light bill. Sea otters transplanted in the area are having an effect on the Dungeness harvests. Cockle shells are much thinner than in the past, which he believes is a sign of environmental changes. He talked about these changes with a United Nations delegation that came to Glacier Bay to discuss marine waters of the world. He informed the Council of his experiences of past meetings/consultations held between the tribes and Federal government entities, stating that if the government seeks a tribe's input then the tribes need to be heard and their testimony should not be just 'a stamp.'

*Ronald Leighton of Thorne Bay* reported that his community is also observing a lack of deer in the area and a dramatic decrease of does with fawns. For the last three years, he has seen a decline of deer, especially on the beaches, and Kasaan Tribal members are concerned about this and also about an overkill of the deer population by predators, like wolves. Kasaan Tribe supports increasing the harvest of wolves in Unit 2. Bear sightings have increased, and he believes that perhaps bear hunting should be reopened. Herring is still a major concern as salmon and halibut depend on herring, and marine mammals may feed on crab and salmon if there is a lack of herring. His community supports no change to the Roadless Rule. He understands there is a push to bring out the timber industry but he is hoping that old growth trees are not targeted. He noted the challenges of obtaining cultural logs for canoes and poles and suggested that prior to the sales of timber, that the Tribe should have first choice to find and mark cultural logs.

*Donald Hernandez of Point Baker* concurred with fellow Council members' observations on Prince of Wales Island. He felt it was significant to point out that a lot of what has been reported is inter-connected. He stated that this past season was the worst Sockeye Salmon fishery that he's ever seen. The various runs of different salmon species throughout the Southeast were very weak and there was even a closure of the Stikine River subsistence fishery this year, which is a major wake-up call. He saw that many people migrated from fishing wild stocks to going to the hatchery sites to try to make their seasons. There is a real sense of unease happening in his subsistence community. He reported that it is getting more difficult for local people to harvest their deer and people hunting the road systems on the north end of the island are not seeing deer. There is a concern about possible changes to the current Roadless Rule as the community has been depending more and more on going to roadless areas to meet their deer hunting needs. He has noticed the severe infestations of hemlock sawfly and, along with the warming climate, the health of our forest is at stake.

Mr. Hernandez then gave his Chair Report. He advised the Council of the Federal Subsistence Board's (Board) decisions on the Southeast Alaska fishery proposals. He also highlighted the Council's proposed change in the customary and traditional use determination proposals, stating that those proposals resulted in major simplifications of a highly fractured kind of customary and traditional use determination.

### **Old Business:**

The Council heard the status of these issues:

- 805(c) Report
- Implementation of new ADF&G Wolf Management Strategy in Unit 2
- Alaska Roadless Rule – Draft Environmental Impact Statement release
- Proposed items for Public Comment on the Alaska Roadless Rule from the Working Group

### **New Business:**

#### ***Wildlife Proposals:***

##### *Regional Proposals:*

*WP20-01: Eliminate the hunt for moose in Unit 1C, Berners Bay*

Motion by Mr. Yeager, seconded by Mr. Kitka, to support WP20-01. The Council felt it had previously considered the issues surrounding a Berners Bay moose hunt very carefully in the last wildlife cycle. The Council considered the request for rural priority in Proposal WP18-11 and the Council voted for a Federal preference on a portion of this hunt. Since there was no new information to warrant a reconsideration or a change of the resulting regulation from WP18-11, the Council felt Proposal WP20-01 was not necessary. The Council added that its fall 2017 meeting discussion and the Chair's testimony at the Board meeting on WP18-11 showed the effort and consideration made in formulating its recommendation for a 25% subsistence priority for permits. The Council believed that this priority did not unnecessarily restrict other users. Right now, all rural residents in Units 1 through 5 have a customary and traditional use in Unit 1C, which includes Berners Bay. The Council felt that it was perfectly legitimate to afford a priority to rural users on this Federal public

land as long as moose were available. The Council also requested that the previous justification for WP18-11 be incorporated into its justification for WP20-01 by reference. Motion failed on a unanimous vote.

*WP20-02: Remove harvest limit restrictions on non-Federally qualified users for deer in Unit 2*

Motion by Mr. Douville, seconded by Mr. Kitka, to support WP20-02. The Council generated a proposal for harvest limit restrictions on non-Federally qualified users for deer in Unit 2 in 2017 after hearing local testimony, which included traditional ecological knowledge that people were struggling to get their subsistence needs met. At the 2019 regulatory meeting, the Council heard testimony from the Ketchikan Indian Community and Prince of Wales Island (POW) residents that POW rural residents were still unable to meet their subsistence needs. The Council looked closely at the data presented in the analysis and noted the potential reasons for the limited numbers of deer could be: out-of-balance buck-to-doe ratios; stem exclusion inhibiting productive deer habitat; an abundance of road access to almost every area on the island; and high wolf and bear populations. The analysis showed that harvest by non-local hunters averaged less than two deer and that overall harvest was below harvest objectives, even though there was a recent reduction of 1,300 hunters. The Council found that because subsistence users are still not meeting their needs, there is a conservation concern for this resource and the potential exists for a dire conservation concern in the future if action is not taken now to conserve the population. Motion failed on a unanimous vote.

*WP20-03: Eliminate doe harvest for deer in Unit 2*

Motion by Mr. Yeager, seconded by Mr. Douville, to support WP20-03. The Council considered the doe harvest to be a use of customary and traditional resources in Unit 2. At one point, the use of harvest tags was implemented in Unit 2 on Forest Service lands, which provided accountability for does harvested. It showed that this take does not create any conservation concerns. The Council stated that eliminating doe harvest would take away harvest opportunities from Federally qualified subsistence users and unnecessarily restrict them. The Council noted that Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) specifically gives a priority to subsistence uses and, if it is necessary to restrict the taking of wildlife population, all other uses shall be restricted first. Motion failed on a unanimous vote.

*WP20-04: Revise harvest limit for deer in Unit 2*

Motion by Mr. Yeager, seconded by Mr. Kitka, to support WP20-04. The Council felt that while it is possible to put a regulation in place that would only apply for two seasons, this was an unusual request and not a normal part of the Council's business or wildlife management. There are mechanisms in ANILCA Title VIII to eliminate all other users should the resource become diminished to the point where a restriction is required and bag limits would then be limited for local rural users. It is expected that biologists and people with traditional ecological knowledge will monitor this so it never gets to that point. The Council also noted that much of the analysis points given in its justification for recommendation on WP20-02 would apply to this proposal as well. Motion failed on a unanimous vote.

*WP20-05: Establish a doe registration permit for deer in Unit 2*

Motion by Mr. Douville, seconded by Ms. Needham, to support WP20-05. The Council believes that using "Tag 5" is an adequate way to keep track of doe harvest and to regulate legal harvest. The hunter has a responsibility to know where it is legal to hunt, and most people know and understand that. Currently, there is adequate

accounting for overall data on doe take through the deer harvest form, which provides managers with good information. Therefore, this proposal would place an unnecessary burden on hunters, and since a hunter can currently utilize “Tag 5” for harvest of a doe, this permit is not necessary. Motion failed on a unanimous vote.

*WP20-06: Shorten season for deer in Unit 2*

Motion by Mr. Yeager, seconded by Mr. Kitka, to support WP20-06. The Council believed that shortening this deer season would put more pressure on rural hunters to be able to get game within a shorter timeframe. Most hunters are finished hunting by Christmas, but there are some that are still hunting and need to get deer. A hunter may need that additional month to get his/her subsistence needs met, and decreasing the hunt by a month may put undue pressure on individuals. The Council is aware that some hunters have limited or no access to electricity and use of a freezer. During the winter months, deer can hang outside for a long time and, if the harvest season is shortened, the meat may not be preserved as long without a freezer. The Council recommended maintaining the Federal rural priority and, though it recognized that it is sometimes prudent to align regulations with the State, it is not always practical. Unnecessary restrictions should not be placed on the rural user. Motion failed on a unanimous vote.

*WP20-07: Reduce harvest limit for deer in Unit 2*

Motion by Mr. Douville, seconded by Mr. Yeager, to support WP20-07. The Council mentioned that two proposals, WP20-03 and WP20-07, put forward by the East Prince of Wales Advisory Committee, contradict each other. (WP20-03 proposes to harvest 5 antlered bucks, and WP20-07 proposes to harvest 4 deer and no more than one may be a doe.) The Council stated that there is no conservation concern at this time and the adoption of WP20-07 would impose unnecessary restrictions on Federally qualified subsistence users, which is not in accordance with Title VIII of ANILCA. The Council also pointed out that in many communities high harvesters provide food to other people and an unnecessary reduction of the bag limit would make subsisting in these communities more difficult. These proxy hunters are good providers for themselves and others, and they hunt legally in accordance with Federal regulations. This tradition is a part of customary and traditional life in Southeast Alaska. Motion failed on a unanimous vote.

*WP20-09: Revise trapping season dates for beaver in Units 1 – 4*

Motion by Ms. Needham, seconded by Mr. Schroeder, to support WP20-09. The Council supported this alignment of Federal and State regulations as harvest levels of beaver have decreased significantly. Although observations and data in the analysis showed that the population has decreased in recent years, there was no evidence to support any concerns for beaver populations. In fact, this proposal may assist in the survival of smolt in certain systems. The Council supported the proposal to avoid possible user confusion. Motion passed on a unanimous vote.

*WP20-12: Revise hunt areas, season dates and harvest limits for deer in Unit 3*

Motion by Mr. Hernandez, seconded by Mr. Douville, to support WP20-12. The Council supported this proposal because there was no conservation concern, even though the deer population in Unit 3 is smaller. The proposal is supported biologically, will benefit subsistence users, and not have any effect on other users. In addition, it will also align Federal regulations with less restrictive State regulations. Motion passed on a unanimous vote.

*WP20-16/17: Extend the sealing period and eliminate the harvest quota for hunting and trapping, and liberalize the hunting harvest limit for wolf in Unit 2*

Motion by Mr. Douville, seconded by Mr. Yeager, to support WP20-16/17. This proposal is the result of many years of discussion between the Alaska Department of Fish and Game, the Council, and subsistence users on POW. The Council supported this proposal based on information from these sources with a caveat that the Council wanted to see how the management scheme worked and how it would be implemented (re: year lapse in DNA sampling and incorporating traditional ecological knowledge (TEK). It is hoped that in future years the State and Federal programs will examine the population estimates from the DNA methods. The estimates will be adjusted up or down based on TEK and reports from local hunters/trappers before the season lengths are set. Wolf trapping on POW has been extremely controversial for decades. This proposal appears to be a good move forward in providing opportunities for harvest and for protecting the wolf resource. There was no conservation concern for the species as the biological information in the analysis is well supported. The Council believed this proposal would be beneficial to subsistence users and non-subsistence users as it clarifies the rules for hunting/trapping and does not restrict anyone. The Council believes the increase in the hunting harvest limit is necessary because whether the harvester is hunting or trapping both groups should have the same harvest limit. A 'no limit' for hunters would not create a conservation concern as it is a small number of people who engage in hunting wolves and the numerous challenges of hunting wolves make it hard for them to be successful; thus, making it difficult for too many wolves to be hunted. Based on information presented in the analysis, the Council believes that the science is finally catching up with TEK in the area. Motion passed on a unanimous vote.

*Southeast Customary and Traditional Use Determination Proposals*

*The Council submitted five proposals for customary and traditional use (C&Ts) determinations. In addition to any further justifications listed below in each proposal, the following justification applies to each C&T proposal submitted by the Council:*

“The Council submitted the proposal with the intent to essentially continue to make good, rational, C&T use determinations. This required good analysis of the uses of this resource throughout the region. Now that this information has been received, the Council could use it to make a solid, informed decision in line with previous work this Council has done in past years on this issue. The analysis recognized that C&Ts were inherited from a regulations structure in place when the State administered the program. The Council did not agree with this structure and felt it did not fulfill the intent of ANILCA. Lastly, the Council believed that this proposal would simplify regulations, clearly set out the eligibility criteria for participation, and it would be beneficial to subsistence users. The proposal increases opportunities for subsistence users throughout the Southeast and the thorough analysis justified this recommendation.”

*WP20-10: Revise the customary and traditional use determination for black bear in Units 1, 2, 3, and 5*

Motion by Mr. Hernandez, seconded by Mr. Yeager, to support WP20-10. Motion #11 passed on a unanimous vote.



*WP20-11: Revise the customary and traditional use determination for brown bear in Units 1, and 3-5*  
Motion by Mr. Yeager, seconded by Mr. Kitka, to support WP20-11. Motion #12 passed on a unanimous vote.

*WP20-13: Establish a customary and traditional use determination for elk in Unit 3*  
Motion by Mr. Yeager, seconded by Mr. Hernandez, to support WP20-13. Written public testimony illustrated the misunderstanding of the elk hunting situation. The Council was informed that if there is no C&T determination, then all rural residents of Alaska are eligible to hunt elk, and most hunters may not know this. The proposal would increase opportunities for subsistence users throughout the Southeast and the analysis justifies this recommendation. The Council supports this proposal to make regulations clearer for the public. ANILCA Section 802 does not address any difference between introduced or natural wildlife. ANILCA Section 804 establishes a Federal subsistence priority: all ungulates are ungulates, and therefore, this resource should be available for Southeast rural residents. This proposal narrows hunter eligibility down from all rural residents of the State of Alaska to rural residents of Southeast Alaska. Since the analysis showed that 90 percent of the harvest came from rural residents of Southeast Alaska already, this proposal recognized an established C&T practice in Southeast. The C&T use determination reflects what people actually do in Southeast Alaska. Motion passed 11-1.

*WP20-14: Revise the customary and traditional use determination for mountain goat in Units 1, 4, and 5*  
Motion by Mr. Yeager, seconded by Mr. Kitka, to support WP20-14. Motion passed on a unanimous vote.

*WP20-15: Revise the customary and traditional use determination for moose in Units 1 and 3*  
Motion by Mr. Hernandez, seconded by Mr. Leighton, to support WP20-15. This proposal would spread out the hunting season to take the pressure away from local subsistence hunting. The Council remarked that they would like to revisit this issue once an aerial survey is done and the moose population can be assessed, because Unit 5 was excluded from this proposal. Motion passed on a unanimous vote.

#### Statewide Proposals:

*WP20-08: Require traps or snares to be marked with name or State identification number for all furbearers in all units*

Motion by Mr. Yeager, seconded by Mr. Douville, to support WP20-08. The Council believed that this proposal intended to fix a problem that does not exist. The Alaska Board of Game rescinded a regulation requiring marked traps a few years ago and no clear issues concerning unmarked traps have been recently presented through staff reports nor have there been any similar recommendations of marking traps from Federal or State biologists. The Council opposed this proposal as a statewide proposal because it covers too broad an area. Motion failed on a unanimous vote.

#### **2020 Fisheries Resource Monitoring Program:**

Scott Ayers, OSM, provided information on the 2020 Fisheries Resource Monitoring Program. The Council took no action on this matter.

***Identify Issues for FY2019 Annual Report:***

- Request to the Federal Subsistence Management Program (FSMP) to explore funding for consistent youth engagement opportunities
- Request to the FSMP to explore funding for wildlife research management projects
- Request to assign staff to attend the Council's meetings in person at the pre-2017 staffing levels
- Request to the Board for review of its Correspondence Policy and revise it to include levels of accountability and to set parameters of edits done at OSM
- Inform the Board about the Council's recent advocacy for ANILCA 810 hearings regarding the Alaska Roadless Rulemaking
- Thank the Board for its guidance and suggestions regarding a letter to the Alaska Board of Fisheries on subsistence shrimp stock and the Extra-Territorial Jurisdiction process

**Agency Reports:**

- USFS Special Actions report presented by Terry Suminski
- USFS Prince of Wales Landscape Level Analysis update presented by DeAnna Perry
- USFS Central Tongass Project update presented by Susan Howle
- USFS Ketchikan-Misty Fjords District Project Updates presented by Susan Howle and Jon Hyde
- USFS Subsistence Program Updates presented by Tom Whitford
- OSM program updates presented by Greg Risdahl

**Future Meeting Dates:**

The winter 2020 Council meeting was set for February 25 – 27, 2020, in Juneau.

The fall 2020 Council meeting was set for October 20 – 22, 2020, in Sitka.

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DeAnna Perry, DFO  
USFWS Office of Subsistence Management

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Donald C. Hernandez, Chair  
Southeast Subsistence Regional Advisory Council

These minutes will be formally considered by the Southeast Subsistence Regional Advisory Council at its winter 2020 meeting in Juneau, and any corrections or notations will be incorporated into the minutes at that meeting.

A more detailed report of this meeting, copies of the transcript and meeting handouts are available upon request. Call DeAnna Perry at 1-800-478-1456 or 907-586-7918, email: [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov).

## Alaska Roadless Rulemaking Timeline



Next Step	Estimated Timeframe
Draft Environmental Impact Statement (DEIS) and Proposed Alaska Roadless Rule Available	October 2019
DEIS Public Comment Period	October – December 2019
DEIS Public Meetings and Subsistence Hearings	November 2019
DEIS to FEIS Work	December 2019 – March 2020
Tribal and Alaska Native Consultation	Ongoing
Public Outreach Activities	Ongoing
Final Environmental Impact Statement Published	Late Spring/Early Summer 2020
Secretary of Agriculture Determines Which Alternative Becomes the Final Rule	Summer 2020
Final Alaska Roadless Rule Published	Summer 2020

From November 2019 Public Meeting Presentation – Alaska Roadless DEIS: [https://www.fs.usda.gov/nfs/11558/www/nepa/109834\\_FSPLT3\\_49353330.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_49353330.pdf)



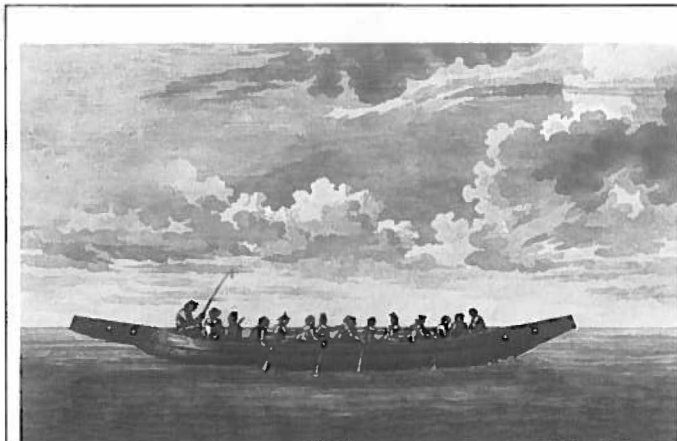
# Environmental Analysis Overview

Key Issue	Alternative 1 No Action	Alternative 2 Roaded Roadless	Alternative 3 Logical Extension	Alternative 4 Partial Development LUDs	Alternative 5 Full Development LUDs	Alternative 6 Full Exemption
Protect Roadless Area Characteristics	Neutral/ No Effect	Neutral/ No Effect	Very Minimal Adverse Effect	Minimal Adverse Effect	Moderate Adverse Effect	Moderate Adverse Effect
Support Local and Regional Socioeconomic Well-Being						
• Forest Products Industry	Neutral/ No Effect	Neutral/ No Effect	Very Minimal Beneficial Effect	Minimal Beneficial Effect	Minimal Beneficial Effect	Minimal Beneficial Effect
• Visitor Industry	Neutral/ No Effect	Neutral/ No Effect	Very Minimal Adverse Effect	Minimal Adverse Effect	Minimal Adverse Effect	Minimal Adverse Effect
• Fisheries Industry	Neutral/ No Effect	Neutral/ No Effect	Neutral/ No Effect	Neutral/ No Effect	Neutral/ No Effect	Neutral/ No Effect
Protect Terrestrial Habitat, Aquatic Habitat, and Biological Diversity	Neutral/ No Effect	Minimal Adverse Effect	Minimal Adverse Effect	Minimal Adverse Effect	Minimal Adverse Effect	Minimal Adverse Effect



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***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Chairman  
1011 E. Tudor Road, MS121  
Anchorage, Alaska 99503**

RAC SE19048.DP

**DEC 12 2019**

David Schmid, Regional Forester  
U.S. Forest Service  
U.S. Department of Agriculture  
Attn: Alaska Roadless Rule  
P.O. Box 21628  
Juneau, Alaska 99802

Dear Regional Forester Schmid:

The Southeast Alaska Subsistence Regional Advisory Council (Council) was formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA). Alaska National Interest Lands Conservation Act Section 805(a) requires the establishment of a regional advisory council in each subsistence resource region in Alaska, and gives each regional advisory council the authority to review and evaluate proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife within that region.

The Council is regulated by the Federal Advisory Committee Act (FACA). The U.S. Congress has formally recognized the merits of seeking the advice and assistance of our nation's citizens to the executive branch of government. Advisory committees have played an important role in shaping programs and policies of the federal government and contributions by these groups have been impressive and diverse. The Council charter outlines its objectives and duties as a FACA committee, which include evaluation of proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the Region.

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The Council has participated in the United States Department of Agriculture Forest Service (Forest Service) planning on the Tongass National Forest for decades. In fact, as far back as 1997, the Council identified specific issues for its Annual Report<sup>1</sup>:

*“Section 810 analyses are insufficient. The agencies have completed many of these analyses and thought it is often determined that there would be a significant restriction of customary and traditional use as a result of planned actions, the agencies come to us with the actions regardless. As it stands, the agencies can say “go to the Federal Subsistence Board” for protections at the same time that the Board refers our concerns to the land managing agency. The subsistence users and the resources on which they depend end up stuck in the middle. This catch 22 is unacceptable, and the FSB, with its members as representatives of the involved agencies, is in the position to take a stand to help. We recommend that the Board issued policy statement to all agencies who have members on the Board to review and evaluate their methods and policies regarding Section 810, and to take appropriate steps to make sure their actions are more than simply lip service to ANILCA.”*

At this same meeting, the Council encouraged a holistic approach to ecosystem management by the Forest Service:

*“. . . we encourage a comprehensive approach to ecosystem management and the integration of landscape and multiple landscape level analyses. Some of the policies we suggest include:*

- *Do not further fragment existing largest blocks of contiguous high volume old growth by timber harvesting or road building;*
- *Strictly adhere to Tongass Timber Reform Act Title III SEC 302(C)(2) in order to help reduce high-grading;*
- *Manage second growth to produce the necessary kinds and distribution of habitats for species diversity;*
- *Habitat conservation areas do not always correspond to community traditional and customary use areas. Additional work needs to go into correlating these two types of areas, highlighting the overlap and differences, and making accommodation for subsistence resources and uses on those lands;*
- *Tongass Land Management Plan should be adaptive, learning from experience and changing in response to new ideas, information, and conditions. It should also be based on natural patterns of disturbance and integrate a species approach with a landscape approach;*

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<sup>1</sup> ANILCA 805(a)(3)(D) charges each regional advisory council with the preparation of an annual report to the Secretaries of Interior and Agriculture, which may contain “(iii) a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs; and (iv) recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.”

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- *The pattern of long term contracting is inflexible over a long period of time and does not allow incremental changes in response to changes in information. This needs to change to accommodate changes in markets, demographics, and new information;*
- *The Council should be commenting on all withdrawals. The Council needs to be involved in Forest Service planning at an early state in order to inform the agency in ways that may prevent many of the problems now inherent in the Section 810 process."*

Clearly, the Council was involved early in reviewing and evaluating management plans on the Tongass that may have substantial effects on subsistence uses of fish and wildlife in Southeast Alaska. The Council continues its commitment to provide information and comments on the development, amendment, and revisions of land and resource management that may alter the ability of subsistence users to harvest and use resources on the Tongass National Forest.

This Council has valuable knowledge relevant to the proposed Alaska Roadless Rule issue and its potential effects on Southeast communities. The Council has previously provided comments on this issue by letter to the Regional Forester dated March 5, 2019 and July 10, 2019 (enclosed). The Council wishes to continue sharing its knowledge and provide a voice for the subsistence users who depend on the resources throughout the Tongass National Forest for their way of life. The Council, a FACA committee with specialized knowledge and experience on issues affecting subsistence uses, should have a meaningful role in evaluating significant restrictions of subsistence uses. The Council submits the following specific comments regarding the Alaska Roadless Rule Draft Environmental Impact Statement (DEIS), October 2019:

**1. The Council finds it difficult to comment on how each action alternative meets the DEIS purpose and need because of the inappropriate scale of the analysis and the regulatory confusion between combining the National Environmental Policy Act (NEPA) and rule-making processes.**

In order to provide useful and meaningful comments on the DEIS, the Council will compare each alternative on how it fulfills the purpose and need for the action. The DEIS outlines three key issues that came from public involvement during scoping for the Notice of Intent, including:

- Key Issue #1: Conserve roadless area characteristics;
- Key Issue #2: Support local and regional socioeconomic well-being, Alaska Native culture, rural subsistence activities, and economic opportunity across multiple economic sectors;
- Key Issue #3: Conserve terrestrial habitat, aquatic habitat, and biological diversity

Next, the Forest Service developed six alternatives, where Alternative 1 represented the No Action Alternative required in NEPA and Alternative 6 represented Full Exemption, as requested

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in the State of Alaska petition. The range of alternatives 2-5 seemingly employ varying degrees of the three key issues and land management categories. Table 2-11 of the DEIS provides a comparison of the alternatives. Key Issue 1 is the only subject where we see any difference between alternatives. Key Issue 1 compares overall roadless characteristics, amount of roadless area removed or added, and roadless area in developmental LUDs. Essentially, the table states that Alternatives 1 and 2 would not change with respect to Roadless Area Conservation; Alternatives 3 and 4 would have minimal adverse effects on Roadless Area Conservation; and Alternatives 5 and 6 would have moderate adverse effects on Roadless Area Conservation. Beyond Key Issue 1, the remaining comparison of alternatives shows little to no differences between Alternatives 2-6. The only real deviation is in the No Action Alternative (Alternative 1).

The Council does not believe that the scale used in the DEIS analysis was correct, as the effects analysis incorporates 9.2 million acres of Tongass National Forest that is currently classified as roadless under the 2001 Roadless Rule. While the argument by the Forest Service has been that an Alaska Roadless Rule is not about timber harvest because the volume of timber harvest will not change, the Council affirms that a primary effect of the Proposed Rule will change “where” timber may be harvested, and that volume of timber extracted may now be shifted to those locations. Approximately 2.1 million acres of the Tongass National Forest is currently classified as “Roadless Area in Developmental LUDs”. Essentially, Alternative 6 – Full Exemption, would open these areas up and because it is a developmental LUD, timber harvest could be shifted to these areas which previously only had Roadless Area protections. The environmental effects analysis in the DEIS analyzes the effects across the entire 9.2 million acres, which appears to drown out any localized effects that each of the six alternatives may have on the 2.1 million acres of development LUDs. At a minimum, the effects analysis should have been scaled down to USDA Forest Service Ranger District levels because the Council believes that certain Ranger Districts (such as Prince of Wales and Petersburg) would demonstrate how the Proposed Rule would cause significant impacts to certain areas.

Chapter 3 of the DEIS contains the Affected Environment and Environmental Consequences analyses, as required by NEPA. In the DEIS, “Subsistence” falls under Key Issue #3 (see above). The Affected Environment for Subsistence starts on page 3-217, which provides the legal context for subsistence use through Title VIII of ANILCA.

National Environmental Policy Act (42 U.S.C. §§4321-4347) was the first statute to require an “impact statement” as a way to ensure that federal agencies give special consideration to certain issues during the rulemaking process. NEPA requires all federal agencies to include in every recommendation or report related to “major Federal actions significantly affecting the quality of the human environment,” a detailed statement on the environmental impact of the proposed action. Initially, though, agencies make a threshold determination (known as an “environmental assessment”) as to whether the rule or other action represents a significant impact on the environment. If not, the agency issues a “finding of no significant impact.” If the agency concludes that there is a significant impact, the agency then prepares a full “environmental impact statement” describing the likely effects of the rule (Congressional Research Service, 2013; <https://fas.org/sgp/crs/misc/RL32240.pdf>).



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In reviewing the DEIS, the Council feels that the Forest Service uses the NEPA and the rulemaking process interchangeably, which creates confusion. When questions arise about potential environmental impacts, the analysis says there is 'no effect' because the action is rulemaking, and does not authorize specific actions on the ground. If the preferred alternative were to be accepted, then the argument is that specific on-the-ground projects would be subject to NEPA. First, continuously subjecting the public to yet another arduous NEPA process for each new timber sale or project is a burden to the people. Secondly, the Council would argue that the USDA did not adhere to the first part of how NEPA applies to the rulemaking process by producing a detailed statement on the environmental impacts of the proposed action. If this occurred, the Council would like to request a copy of the threshold determination (environmental assessment) as to whether or not the proposed rule represents a significant impact on the environment.

**2. The Council believes the subsistence use information in the DEIS is outdated, and recommends the DEIS show current subsistence harvest and use patterns by community.**

The Forest Service commissioned major studies of subsistence harvest and use of fish and wildlife in the Tongass National Forest in the 1980s and 1990s, mainly to have adequate data to document subsistence harvest and use, map subsistence use areas, and examine the cultural, social, and economic importance of subsistence. This work included in-depth community studies in many Southeast Alaska communities, comprehensive surveys of harvest and use that documented the diet breadth of resources used, harvest levels and food weight of harvests estimated by community, and map biographies used to accurately depict community use areas. Subsistence users in rural Southeast Alaska typically use more than 200 pounds food weight of fish and wildlife harvested from the Tongass National Forest and adjacent waters. The Council estimates that between \$1 - 2 million was spent on these early baseline studies. Forest Service has largely abandoned its responsibility to continue to monitor subsistence uses in the Tongass National Forest, and has not supported data gathering efforts needed to determine if there have been changes in subsistence uses, or if the Forest Service's land management practices have significantly restricted subsistence uses.

The effects of forest management actions on subsistence are not merely theoretical or anticipated. In fact, much of the Council's regulatory work addresses restrictions to subsistence uses that have taken place due to past Forest Service management actions. For example, in its role of providing recommendations on hunting and fishing regulations on Federal public lands, the Council has had to repeatedly consider proposals concerning management of deer on Prince of Wales Island. Because Federally qualified subsistence users have had difficulty in getting the deer that they need, the Council has, somewhat reluctantly, recommended reductions in seasons and harvest limits for deer for non-Federally qualified urban hunters in Game Management Unit 2. These regulatory changes were required largely because of the deleterious effects of timber

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harvest and road building on subsistence uses of fish and wildlife on Prince of Wales Island and other islands in Game Management Unit 2.

The Forest Service has largely neglected to gather data needed to show current subsistence patterns beyond baseline studies that are now 20 to 30 years old. Furthermore, the DEIS makes very limited use of the available, excellent, although dated, data on subsistence. At a minimum, the DEIS should describe subsistence harvest and use at the community level. This would need to include all available harvest and map data showing use areas. An adequate analysis should examine subsistence dependency and note any changes in subsistence uses that may have taken place. It should discuss subsistence on a species by species basis. Such an analysis would also describe expected effects, community by community. A finding of significant restriction on subsistence uses would need to specifically show what uses were affected and where these restrictions would take place.

Failure to adequately document subsistence uses through support for data gathering activities and failure to thoroughly describe and analyze subsistence uses on a community scale make it impossible for the DEIS to fulfill its responsibilities under ANILCA Section 810. **The DEIS needs to be withdrawn and redone to rectify these abject failures.**

**3. The Council does not believe making references to the 2016 FEIS for the Amendment to the Forest Land Management Plan is sufficient analysis for the Alaska Roadless Rule DEIS.**

The DEIS frequently refers to other Forest Service documents in lieu of presenting sufficient detail such that it makes it difficult for the reader to understand the importance of the Alaska Roadless Rule document. In general, the DEIS often directs the reader to the less than transparent 2016 Forest Plan FEIS. For example, the DEIS states in 3-128:

*“A summary of the effects of climate change on Tongass resources is presented in the Climate and Air section of the 2016 Forest Plan FEIS (USDA Forest Service 2016b). Because the effects of the alternatives on climate change are the same, this discussion is not repeated here.”*

This is not acceptable for a number of reasons. First, very few people reviewing the 2019 DEIS have familiarity with or access to the 2016 document. The DEIS needs to be evaluated on what is included in the DEIS. Referring to other documents does not meet NEPA requirements. If it did, future Forest Service planning documents could simply be lists of references to other NEPA documents. This is not the intention of NEPA. Second, by hanging the discussion of climate change on a 2016 FEIS, the 2019 DEIS appears to admit that no work has been done that examines what we know now about climate change. The 2016 FEIS relies on data and analysis done years ago. Climate science has advanced a great deal in the past decade. Specifically, we know much more about the magnitude of global heating because we have already experienced it firsthand, and much more about what is likely to occur in coming decades, than we knew when

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the 2016 FEIS was being prepared. We also have the interagency November 2018 National Climate Assessment with a section specifically addressing Alaska.

Finally, the 2019 DEIS indicates that the 2016 FEIS will be changed to allow more timber harvest. Indeed, if there is no subsequent change in the 2016 FEIS, there is no reason to change the 2001 Roadless Rule designation. At the present time, exemptions exist in the 2001 Roadless Rule for many important development activities. These activities include providing access for mining development, for hydro and other utility construction and maintenance, for improving communications, and other activities. The Council heard from Forest Service staff that about 50 exemptions have been recognized since the 2001 Roadless Rule was enacted, and that no exemptions were denied.

The only significant development activity limited by the 2001 Roadless Rule is roadbuilding to support logging in roadless areas. In the State of Alaska's January 19, 2018 submission to the US Department of Agriculture, Commissioner Andrew Mack is clear on the purpose of his petition for rulemaking found at A-1:

*"We see this as one of many significant opportunities to work with you to support a diverse and robust forest products sector in Southeast Alaska. Rebuilding this sector will create jobs and prosperity for our rural communities located in the Tongass National Forest."*

Since logging acreage cannot be increased without changes to the 2016 FEIS, the Council anticipates that the Forest Service will quickly act to amend or revise the 2016 FEIS once it has issued a record of decision on the revised 2001 Roadless Rule. The amended or revised 2016 FEIS would increase logging activity in line with the request from the State of Alaska. If no change in the 2016 FEIS takes place, very little additional timber may be harvested and the dreams of the vestigial Southeast forest products industry will be dashed.

#### **4. The Council believes the Cumulative Effects analysis in the DEIS is insufficient.**

Cumulative effects are defined by the Council on Environmental Quality Regulations as:

*"The impact on the environment which results from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency, Federal or non-Federal or person undertakes such actions."*

The Council feels that the underlying assumption that none of the Alaska Roadless Rule alternatives propose or authorize specific on the ground actions is extremely short-sighted (see page B-1 in DEIS). The Council believes that the selection of Alternative 6 (full exemption) would be the first step toward future incremental impacts in areas where road building is currently not allowed.

Within the Alaska Roadless Rule DEIS, the timeframe of analysis identified for Regional

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cumulative effects (page B2 in the DEIS) states:

*“...encompasses past and future activities. Past activities include timber harvest and other activities that date back over 70 years, while future activities consider timber harvest up to 100 years in the future.”*

Therefore, the cumulative effects section should have included a discussion of both the Prince of Wales Landscape Level Assessment and the Central Tongass Landscape Level Assessment. Further, a mapping exercise on how the project areas in these two projects would overlap with the different alternatives of the Alaska Roadless Rule should have been conducted, since many alternatives, including full exemption, would now allow for road building in previously defined roadless areas.

**5. The Council believes the DEIS does not provide an adequate analysis for Environmental Justice, and that any of the action alternatives will most assuredly prompt an amendment or revision to the 2016 Forest Plan.**

Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) requires federal agencies to perform an analysis of whether the proposed project would cause disproportionate adverse impacts to minority or low-income populations that live in the proposed project area. The Alaska Roadless Rule DEIS includes a brief Environmental Consequences section on page 3-230 that states:

*“As discussed elsewhere, this EIS is programmatic and, as such, examines direction and allowable activities for broad land areas, rather than schedules specific activities in specific locations. The action alternatives would increase the acres available for timber harvest, but harvest levels are expected to remain the same across all alternatives. In addition, while there may be some variation by alternative, the amount of new or reconstructed road miles is expected to be broadly similar across all alternatives. This makes it difficult to evaluate the effects of the alternatives on particular communities or populations.”*

The Council believes this explanation and the two subsequent paragraphs in the DEIS are deficient. First, while the DEIS may be programmatic, it would be the first step needed to shift where timber harvest may occur. The subsequent argument suggests that protections would still be offered by Forest-wide Standards and Guidelines in the 2016 Forest Plan, but the State of Alaska has already requested that the Secretary of Agriculture direct the Forest Service to commence a Tongass Land Management Plan (TLMP) revision or amendment (pages A2-A9 of DEIS). It is noted that the 1997 Tongass Land Management Plan was revised in 2008 and then again through an amendment in 2016. In March of 2019, Administrative Changes to the 2016 Forest Plan have already occurred. It is not comforting to be told that the Forest Plan and Standards and Guidelines will continue to be protective of specific resources (i.e. Heritage

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Resources, page 3-230 in the DEIS), when these plans appear to change readily. The Council feels it would be better to leave the 2001 Roadless Rule protections in place, rather than rely on standards, guidelines and plans that are subject to change if full exemption is granted.

Current protections from the 2001 Roadless Rule around predominantly Native Alaskan communities such as Kake, Hoonah, Hydaburg, and Yakutat would disappear in this first “programmatically” step. A simple mapping exercise that overlays Alternative 6 with the current location of suitable timber shows where, relative to predominantly minority and low-income communities, road building for timber harvest would be able to occur with a full exemption to the 2001 Roadless Rule. This exercise should be applied to the other alternatives, as well, in order to truly determine the differences in environmental consequences between alternatives. Finally, the DEIS should outline the impacts to minority or low-income populations by each alternative.

The Council is concerned that opening up roadless areas to logging will encourage a Forest Plan revision or amendment to facilitate further development. When the Council pressed Deputy Chief French on this issue at our meeting, his response was less than reassuring. Although he expressed a commitment to following the existing Forest Plan, which calls for a rapid transition to second growth management, he also noted that Forest Plans are subject to revisions and amendments. The public is very aware that there has been ardent resistance from timber industry groups to a transition to second growth. We are also aware that there is strong political support from Governor Dunleavy and our Alaska Congressional Delegation for the timber industry and a full exemption from the 2001 Roadless Rule. It is not unreasonable to assume that if hundreds of thousands of acres of forest are reclassified as suitable timber for logging, there will be an effort to revise the Forest Plan to exploit that opportunity. Given that any change to the 2001 Roadless Rule will be a “durable and long lasting regulation” and that Forest Plans are subject to changes at regular intervals, the Council has no confidence that subsistence uses in the roadless areas will be protected for future generations. The continuation of subsistence practices long into the future is foremost the Council’s responsibility. Custom and tradition are the heart of the subsistence way of life, and having large blocks of intact habitat where subsistence harvesting can occur in the traditional manner is the only assurance we have that these practices will continue for many generations to come.

**6. The Council supports the Federally recognized Tribes and Tribal Cooperating Agencies that support the No Action Alternative.**

The Council recognizes that the Forest Service requested the participation of Federally recognized Tribes from Southeast Alaska as cooperating agencies. Six Tribes rose to the occasion and signed on via Memorandum of Understanding (MOU) in good faith to provide local expertise and knowledge of how changes to the 2001 Roadless Rule may impact areas within their traditional territories. The Council commends the Forest Service for acknowledging that local Tribes have specialized expertise for the lands that fall within their traditional territories. However, a recent letter signed by all six Tribal Cooperating Agencies criticizes the process:

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- (1) *“We are profoundly disappointed with the manner the roadless rule exemption process has been handled, especially in regards the federally recognized tribes that involved themselves as “cooperating agencies”. It is our opinion that the lead agency has not honored their responsibility to cooperating agencies. Specifically, we point to two sections of the main steps of the NEPA process (40 CFR § 1501.6 – Cooperating Agencies) which we do not feel have been met:*
- (2) *Use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the maximum extent possible consistent with its responsibility as lead agency.*
- (3) *Meet with a cooperating agency at the latter’s request.*

*The U.S. Forest Service plowed recklessly ahead at a frantic pace to satisfy a predetermined timeline. The arbitrary two-week deadline given for Tribal cooperating agencies to review and comment on the Preliminary Draft Environmental Impact Statement (DEIS) was insufficient for us to solicit insights fully from our respective Tribal Councils into the far-reaching implication of this controversial rulemaking. Additionally, the USFS declined to address all of the substantive concerns raised by the cooperating agency Tribes on the Preliminary DEIS, including updating community use areas to reflect territories/uses accurately or consider alternatives that provide co-management authority for Tribes concerning all activities within inventoried roadless areas located inside a Tribe’s traditional territory.”*

The letter also condemns the Secretary of Agriculture for choosing Alternative 6 as the Preferred Alternative in the DEIS:

*“The granting of the State of Alaska’s petition for an Alaskan exemption to the 2001 National Roadless Conservation Rule on the Tongass in 2018, without consulting any affected Native peoples, represents the most controversial and potentially destructive assault on our way of life to date. It was clear from the outset that an Alaska Specific Roadless Rule would not leave current roadless protections in place – roadless protections were going to be stripped from the lands we have called home since time immemorial.”*

In testimony before the U.S. House of Representatives Subcommittee for National Parks, Forests, and Public Lands, President Joel Jackson from the Organized Village of Kake summarized their experience at trying to participate as a Tribal cooperating agency in the process. His testimony confirmed what the Council had been hearing since the process started: Tribes put in countless hours providing local knowledge, without compensation or any time extensions, only to have information not included in the DEIS.

The selection of Alternative 6 for Full Exemption to the 2001 Roadless Rule as the preferred alternative appears to have blindsided the Tribal Cooperating Agencies, and testimony from Region 10 Planning Director Chad VanOrmer during the Council meeting (November 5, 2019) was chosen because it best fit the petition request by the State of Alaska, not because it best fit

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the Purpose and Need of the DEIS. Subsequently, even prior to the release of the DEIS, the Alaska Congressional Delegation expressed their support for the full exemption alternative:

*“The one-size-fits-all Roadless Rule is an unnecessary layer of paralyzing regulation that should never have been applied to Alaska. A full exemption from it has always been my preference, as well as the united preference of our state’s congressional delegation and that of Alaska’s governors, regardless of party.”* – Lisa Murkowski, Washington Post Op-Ed, September 25, 2019

While there were six alternatives developed in the DEIS, it appears on a national level that the State of Alaska’s request for a full exemption is the preferred alternative; however, on a local level there is a united voice against full exemption. This was published in the summary of comments from the scoping period, where 90% of the comments were opposed to exempting the Tongass National Forest from the 2001 Roadless Rule. Further, all six cooperating agencies acknowledge that while some Tribes may have been working to find a compromise between the No Action and Full Exemption Alternatives, none of the Tribes chose Full Exemption.

After government-to-government consultation with Undersecretary Hubbard, additional Federally recognized Tribes have recently united and spoken out against Full Exemption (March 5, 2019 letter to Roadless Rule team; July 10, 2019 letter to David Schmid; November 19, 2018 letter to Sonny Perdue from Tribes; and November, 19, 2019 letters to the Alaska Delegation from Tribes—all enclosed) and are now supporting Alternative 1, the No Action Alternative in the DEIS. The Council fully and wholeheartedly continues to support the Federally recognized Tribes, the Tribal cooperating agencies, and the majority of the Southeast Alaska public that weighed in during the process.

#### **7. The Council supports the use of Traditional kwaan and clan territories in the DEIS.**

Traditional clan and kwaan ownership of lands that now make up the Tongass National Forest is well established. Moreover, maps and descriptions of this ownership are readily available. See *Haa Aaní Our Land: Tlingit and Haida Land Rights and Use*, Walter Goldschmidt and Theodore Hass, 1913, reissued 1998. These traditional use areas were reviewed through interviews in study communities by the Division of Subsistence in the 1980s and 1990s with Forest Service support. Traditional ownership or *at ow* differs from legal ownership in that it establishes the right to use land and resources under traditional law. In Tlingit and Haida culture and society, this has been a formal ownership and use right; this ownership normally did not include transactional sale or purchase of land.

The omission of depiction and description of traditional kwaan and clan territories is a NEPA failing, since traditional ownership or *at ow* is a “fact on the land” that needs to be included. Omission also continues to unfortunately enable colonial attitudes and approaches to land management that ignore or devalue traditional culture. For the Tribes and clans of Southeast Alaska, this is an existential issue.

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**8. The Council supports and advocates for subsistence users who have testified on the record their recommendation of no change to the 2001 Roadless Rule.**

The Council heard extensive testimony on the Alaska Roadless Rule at the two previous Council meetings. No change to the existing rule has been the overwhelming recommendation. Subsistence users in rural communities stress the importance of healthy fish and wildlife habitat to support their subsistence harvesting. Rural subsistence users also depend on these same habitats to support their means of making a living, which are primarily connected to commercial fishing, tourism, and businesses related to those industries. Protecting cultural and sacred sites has also been a main concern. The Council believes that the small number of timber harvesting jobs held by rural residents will not be adversely affected and, in fact, could increase if the Forest Service implements its Forest Plan to transition to second growth harvest—without impacting existing roadless areas.

**9. The Council supports the development of a strong ANILCA Section 810 analysis, which includes an evaluation of cumulative effects needed to make a determination of significant restriction to subsistence uses. A Record of Decision would need to establish a rationale that the action was ‘necessary.’**

Much of the Council’s work concerns the fish and wildlife regulatory responsibilities found in ANILCA Sections 802 and 804. ANILCA Section 805 authorizes the Council to review and evaluate management plans.

*“§ 805. (a) Except as otherwise provided in subsection (d) of this section, one year after the date of enactment of this Act, the Secretary in consultation with the State shall establish:*

*(1) at least six Alaska subsistence resource regions, which taken together, include all public lands. The number and boundaries of the regions shall be sufficient to assure that regional differences in subsistence uses are adequately accommodated;*

*(2) such local advisory committees within each region as he finds necessary at such time as he may determine, after notice and hearing, that the existing State fish and game advisory committees do not adequately perform the functions of the local committee system set forth in paragraph (3)(D)(iv) of this subsection; and*

*(3) a regional advisory council in each subsistence resource region. Each regional advisory council shall be composed of residents of the region and shall have the following authority:*

*(A) the review and evaluation of proposals for regulations policies, **management plans**, and other matters relating to subsistence uses of fish and wildlife within the region;*

*(B) the provision of a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife within the region”*



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Section 810 of ANILCA informs the Council's responsibilities concerning land management actions. This section is the bedrock of ANILCA protection of subsistence uses from unnecessary, significant restrictions caused by Federal land management decisions.

*“§810. (a) In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands under any provision of law authorizing such actions, the head of the Federal agency having primary jurisdiction over such lands or his designee shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the 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. **No such withdrawal, reservation, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency—***

*(1) gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to §805;*

*(2) gives notice of, and holds, a hearing in the vicinity of the area involved; and*

*(3) determines that--*

*(A) such a significant restriction of subsistence uses is **necessary**, consistent with sound management principles for the utilization of the public lands,*

*(B) the proposed activity will involve the **minimal amount of public lands necessary** to accomplish the purposes of such use, occupancy, or other disposition, and*

*(C) reasonable steps will be taken to **minimize adverse impacts upon subsistence uses and resources** resulting from such actions.*

*(b) If the Secretary is required to prepare an environmental impact statement pursuant to §102(2)(C) of the National Environmental Policy Act, he shall provide the notice and hearing and **include the findings required by subsection (a)** as part of such environmental impact statement.*

*(c) Nothing herein shall be construed to prohibit or impair the ability of the State or any Native Corporation to make land selections and receive land conveyances pursuant to the Alaska Statehood Act or the Alaska Native Claims Settlement Act.*

*(d) After compliance with the procedural requirements of this section and other applicable law, the head of the appropriate Federal agency may manage or dispose of public lands under his primary jurisdiction for any of those uses or purposes authorized by this Act or other law.”*

ANILCA Section 810 requires Federal land management agencies to evaluate the effects of their proposed actions on subsistence uses and needs. Where an agency finds that its action may significantly restrict subsistence uses, it is prohibited from implementing that action prior to taking certain steps. Those steps include: giving notice to certain State, local, and regional entities (including regional councils); giving notice of and holding hearings in the vicinity of the

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area involved; and determining that (A) such a significant restriction if subsistence uses is necessary, (B) the proposed activity will involve the minimal amount of public lands necessary, and (C) reasonable steps will be taken to minimize adverse impacts on subsistence uses and resources. The agency must also provide its “may significantly restrict” finding and hearing notices within its environmental impact statement. ANILCA Section 810 hearings are held to inform the public that the land management action may significantly restrict subsistence uses, to verify the subsistence analysis, and to hear directly from the public concerning the acceptability of the likely restrictions on subsistence uses. The hearings required under ANILCA Section 810 **cannot precede the required subsistence finding (FSH2090.23).**

The DEIS and Roadless Rule team appear to misunderstand ANILCA Section 810 and have not fully committed to following ANILCA Section 810 provisions. The Council heard a presentation on the Alaska Roadless Rule process by Region 10 Economist Nicole Grewe and Tongass Forest Supervisor Earl Stewart at our winter meeting in Wrangell, Alaska on March 19-21, 2019. Ms. Grewe stated on the record (Transcript of Council Meeting, March 21, 2019, Pages 293-297) that the DEIS was not required to follow Section 810 procedures. The Council strongly disagreed with this erroneous interpretation and requested that the Roadless team follow the required ANILCA Section 810 procedures. Subsequent to the March meeting, Council Chair Don Hernandez raised this issue with Regional Forester Dave Schmid. Mr. Schmid assured Mr. Hernandez that ANILCA Section 810 procedures would be followed (Transcript of Federal Subsistence Board Regulatory Meeting, April 18, 2019, Pages 23-25).

At our recent Council meeting in Ketchikan, November 5-7, 2019, Alaska Roadless Rule team members Deputy Chief Forester Chris French and Region 10 Planning Director Chad VanOrmer presented the DEIS to the Council. Their presentation made no mention of ANILCA Section 810 requirements. Mr. French was asked repeatedly on whether or not the Roadless EIS would follow ANILCA procedures as the Council had requested in previous comments. Mr. French equivocated and told the Council that there were different views on whether there would be a subsistence determination. Apparently, this issue was not settled before issuing the DEIS. He incorrectly stated that subsistence determinations were not made in the 2016 FEIS. Mr. French communicated by email with the Council, maintaining that the Final Environmental Impact Statement (FEIS) would make an ANILCA Section 810 finding. He said that a letter to that effect was being sent to the Council, which was received November 15, 2019. The Council notes that the DEIS states on page 3-328 that “an ANILCA determination may be made in the record of decision, if appropriate.” This does not indicate a commitment to follow ANILCA requirements.

The Council makes the following points regarding making ANILCA Section 810 determinations:

- a) ANILCA procedures reproduced above are straightforward and easy to understand.
- b) The Council finds that the DEIS simply does not sufficiently address this requirement. The DEIS does not appear to cite the ANILCA Section 810 requirements in subsistence sections or elsewhere in the text. From reviewing the DEIS text and listening to the

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Alaska Roadless Rule team presentations at public meetings, no one would have any idea that ANILCA Section 810 was a planning requirement.

- c) Available subsistence data including community studies, mapping data showing subsistence use areas, and quantitative data showing harvest levels and participation were inadequately presented and not analyzed. The subsistence data found in the DEIS is wholly inadequate to evaluate impacts on subsistence uses.
- d) The scale of presentation is wholly inadequate to see what effects on subsistence uses might take place by community or area.
- e) Past Forest Service NEPA documents have considered cumulative effects on subsistence uses. Cumulative effects refer to the results of major changes in the Tongass ecology due to the industrial logging and attendant road building initiated with the long-term sales.
- f) The DEIS needs to present the context of ANILCA Section 810 and describe how its requirements have been met in earlier NEPA documents. This is essential for the public to understand the scale and scope of the DEIS.

Regarding the ANILCA Section 810 determination process, the Council concludes the following:

- a) ANILCA Section 810 requirements have not been met in the DEIS. In fact, the DEIS does not even attempt to meet them.
- b) The so-called subsistence hearings did not meet ANILCA Section 810 requirements for hearings since the DEIS did not make any findings (of significant impact or otherwise) to subsistence uses AND did not show any effects at a scale meaningful to participants at the hearings. In hearings that Council members attended or heard about, people valiantly spoke of the importance of subsistence to their families, their communities, and their culture. But in the absence of an adequate DEIS and with presentations by Alaska Roadless Rule team members that did not provide an orientation to ANILCA Section 810 requirements, testimony could not address specific problems. The hearings were basically “open mic” time. It is noteworthy, however, that virtually all speakers favored Alternative 1, the no action alternative.
- c) **To meet ANILCA Section 810 requirements, the DEIS needs to be withdrawn since it clearly does not follow the law.** The Council stands ready to work with a subsequent Roadless Rule team in preparing an adequate planning document.

**10. The Council wishes to remain engaged with the Alaska Roadless Rule team through the ANILCA Section 810 analysis and ANILCA Section 810 determination.**

The Council appreciates that ANILCA Section 810 hearings were held in rural communities in Southeast Alaska during the public comment period for the DEIS. It was the Council’s intention to provide a summary for each community on behalf of the testimony received during the hearings. However, not all hearings had been conducted prior to the Council’s timeline for submitting comments during the public comment period. Further, transcriptions from the hearings were not available. While audio recording were available, and some hearings were attended by Council members and audio recordings were reviewed, there was not sufficient time for the Council to capture and summarize all points. The Council reserves the right to take this

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effort up at their next regularly scheduled meeting in February, 2020, in Juneau. Further, the Council wishes to remain involved in providing subsistence related information into the NEPA process, even if it is outside of the public process, in our capacity as a FACA committee.

**11. The Council requested a carbon accounting analysis for the Tongass National Forest, which was not fulfilled. Further, the DEIS discussion on carbon is inadequate.**

In earlier comments on the Alaska Roadless Rule process, the Council asked for a carbon budget and accounting for the Tongass National Forest. We requested estimation and analysis of:

- a. Carbon capacity before industrial logging
- b. Carbon capacity at present after industrial logging
- c. Carbon capacity projection

These requests for meaningful data and analysis were not fulfilled. The DEIS discusses carbon beginning at page 3-121 and continues on the following pages. The DEIS makes no attempt to provide quantitative data on carbon capacity—past, present, or future. This is a clear failing of the DEIS since it does not present the best available data on this topic. In place of actual data, the DEIS launches into an inconclusive lengthy discussion that befuddles the obvious fact that removing large quantities of timber from the Tongass National Forest reduces the carbon carrying capacity of the forest.

Given the importance of carbon sinks and carbon storage in the context of global heating, the omission of any substantive analysis and quantification is unconscionable. The DEIS discursive discussion obfuscates the effects of timber harvest in the Tongass National Forest by refusing to accurately report known and established science on the role of forests in capturing and storing carbon. The tone edges on a denial of established climate science.

Recent sales of carbon credits by Sealaska Corporation (Sealaska) provide a metric for the economic value of the carbon stored in the Tongass National Forest. These sales allow and require the DEIS to develop an indicator dollar value for stored carbon. By forgoing development of some of its timber lands, Sealaska received cash payments. Data from these sales should be used to impute a dollar value to Tongass National Forest lands.

The Council feels the DEIS analysis of carbon sequestration is also inadequate. The DEIS discusses carbon sequestration on 3-123, but the discussion is difficult to follow and is inconclusive. The DEIS reports that, worldwide, forests take up and store 1.4 billion metric tons of carbon every year. The DEIS cites one paper from 2006 (Leighty et al.) that estimates that the Tongass National Forest lost 6.4 to 17.2 million metric tons of carbon due to logging. Heath et al. (2011) estimated that the Tongass National Forest accounted for 11% of the carbon stored in national forests in the United States in 2005. According to the DEIS, the Tongass National Forest may store an estimated 601 to 650 million U.S. tons of above-ground carbon. This is equivalent to 2.4 billion tons of carbon dioxide. Needless to say, this is a lot of carbon and

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carbon dioxide equivalents. However, the data cited in the DEIS are old and more recent studies on forest carbon sequestration are not examined. This is a serious defect in the DEIS.

The Council believes that carbon sequestration needs to be considered as a best use of the Tongass National Forest. By preserving and enhancing forest resources, sequestration would also serve to protect subsistence uses of the Tongass National Forest from significant restrictions. The decision not to consider sequestration as an important forest value may have ANILCA Section 810 implications.

Enhanced carbon sequestration is required in light of the October 2018 International Panel on Climate Change report and November 2018 National Climate Assessment report. These documents are cited, but their stark conclusions are not discussed. Note that the National Climate Assessment report has a separate section covering Alaska. The DEIS needs to address how the change in the 2001 Roadless Rule would affect carbon sequestration, considering the global need for climate emergency amelioration.

**12. The Council believes full exemption of the 2001 Roadless Rule will allow for more timber harvest.**

The Council believes the claim that the action alternatives do not increase timber harvest is erroneous. All action alternatives including the preferred alternative result in increases in suitable timber land by allowing logging in currently roadless areas. While the 2016 FEIS may set the allowable acreage for timber sales, harvest of some of the remaining high-volume old growth stands that are currently in roadless areas will increase the amount of timber harvested. These changes will allow greater logging of old growth timber to take place and are a significant land management action. The Council is baffled that the Forest Service's DEIS appears to claim that changes to the 2001 Roadless Rule will not result in any actual changes in land management. The stated purpose of the change in the Alaska Roadless Rule is to allow for enhanced development, i.e., logging, in the Tongass National Forest.

As we see it, the main reason for seeking an exemption for the Tongass is to bolster the timber industry. If there was enough "economic timber" available within the scope of the existing Forest Plan it would not be necessary to develop the roadless areas. The Council contends that in order for the agency to meet its requirements to provide economically viable timber sales in the coming years it will undoubtedly target logging some of the most biologically valuable old growth habitat available in the roadless areas. This high-grading would have a much greater detrimental effect on subsistence resources. In addition to the harm from high-grading, another negative impact would be the fragmentation of large blocks of old growth habitat, which is the cornerstone of the conservation strategy—an integral part of the Forest Plan.

The intent behind choosing Alternative 6 as the preferred alternative in the DEIS is clear.

*"Alternative 6 would result in an administrative change to the timber land suitability determinations made in the 2016 Forest Plan. Specifically, lands*

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*identified as suitable for timber production that were deemed unsuitable solely due to roadless designation in the Plan would be designated as suitable for timber production.”*

Additionally,

*“For larger sales, more acres of suitable old-growth land would allow the Forest Service greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the planning areas selected. This improved flexibility could, in turn, potentially improve the Forest Service’s ability to offer economic sales that meet the needs of industry. This greater flexibility could be especially beneficial during the first two decades of the 2016 Forest Plan (the transition period), when most old-growth harvest would take place.”*

The preferred alternative, with full exemption from the 2001 Roadless Rule, would result in no regulatory prohibitions on timber harvest, or road construction/reconstruction, and land management activities would be guided primarily by the 2016 Tongass National Forest Plan. It is important to note that the Forest Plan was based on an alternative that provided the second largest amount of old-growth volume among the considered action alternatives. The Plan is expected to produce an average of about 12 MMBF of young growth and 34 MMBF of old growth per year during the first 10 years. Under the current Forest Plan, Inventoried Roadless Areas are withdrawn from timber production and are not suitable for timber production. The protection of roadless characteristics would be directly proportional to the projected areas of timber harvest in the preferred alternative. The Council believes that the proposed Alaska Roadless Rule would open up current protected old growth stands that are crucial for a range of fish and wildlife habitats, contrary to the comment that the amount of timber harvested under the preferred alternative would not be any different than what is allowed under the current Forest Plan.

The DEIS states that an irreversible or irretrievable commitment of resources will not be made by the rulemaking. It should. Of importance here is an explanation of these commitments in the 2016 Forest Plan, which explained: “Irreversible commitments are decisions affecting nonrenewable resources, such as soils, minerals, plant and animal species, and heritage resources. Such commitments of resources are considered irreversible because the resource has deteriorated to the point that renewal can occur only over a long period of time or at a great expense, or the resource has been destroyed or removed. While the application of Land Use Designations (LUDs) allowing land-altering activities can indicate the potential for such commitments, the actual commitment to develop, use, or affect nonrenewable resources is made at the project level. The gradual decline in old growth habitat may be considered an irreversible commitment.” Irreversible commitments should not be left to the discretion of a project and should be afforded the broader protection under the current 2001 Roadless Rule because of the long-term or permanent harm to habitat.

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The push for changing the designation of land uses so that logging and other activities can take place through the Alaska Roadless Rule is also not necessary. The Council was informed that the Alaska Roadless Rule would allow access to cultural use of wood, additional access around municipal water and wastewater systems, biomass, and renewable energy; however, under the current 2001 Roadless Rule, there are already exceptions that allow these and other activities. Deputy Chief Forester Chris French recently testified before the Subcommittee on National Parks, Forests, and Public Lands that the Forest Service has been asked for more than 50 exceptions for activities within roadless areas in past years, for a variety of purposes, and that, to his knowledge, all had been approved.

There were renewable energy plan components, as well as transportation system corridor plan components, added to the 2016 Forest Plan. This Plan improved flexibility for activities and access on the Tongass National Forest, and when opportunities are insufficient, permits are being granted for exceptions. There is a built-in alternative for additional flexibility within the Forest Plan and, therefore, there is no need to make the Tongass National Forest exempt from the current 2001 Roadless Rule.

**13. The Council encourages maintaining large blocks of old growth in order to offset future impacts of climate change to subsistence fish and wildlife.**

There are two important considerations with regard to climate change, subsistence and the roadless areas of the Tongass National Forest. One, addressed at length in these comments, is the long-term benefits of maintaining the large tracts of old growth forest within the Tongass National Forest to slow the progress of a warming climate, which will have dire consequences for subsistence resources. The other is the effects of climate change to subsistence resources that are happening right now in real time. The Council has heard in recent years much public testimony about observations and concerns over changing conditions in our forest. These range from hotter drier summers affecting stream flows and temperature, lack of winter snow pack that has the same effect, but also extreme rainfall events that wash out spawning beds, cause landslides, and increase siltation. We also hear of changes happening to the forest itself, such as hotter drier summers causing insect infestations and warmer winters causing Yellow Cedar decline, both leading to defoliation. The combination of warmer weather and road development are also leading to the increase in invasive plant species. Maintaining large blocks of biologically diverse old growth forest is crucial to protecting subsistence resources on a large watershed level scale from the immediate consequences of a warming climate.

**14. The Council supports the restoration and rehabilitation of the Tongass National Forest.**

In light of the widespread human induced ecological changes in the Tongass National Forest and the progressive environmental degradation that has taken place in forested areas as a result of heavy logging and roading, the Council supports the restoration and rehabilitation of the Tongass National Forest to its natural state. While resource extraction may have been a rational priority in the 1950s when long-term contracts were negotiated (Ketchikan Pulp Corporation no bid contract signed in 1951, and Alaska Pulp Corporation no-bid contract signed in 1956, allowing

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for over 13 billion board feet of timber harvest), current national and regional priorities have changed.

In Southeast Alaska, the important economic uses of the forest are: supporting the mixed subsistence-based economies of rural communities, a burgeoning tourism industry that relies on wild places and an unspoiled environment, and subsistence, sport, and commercial fishing that depends on healthy salmon returns to streams with natural water flow and aquatic rearing habitat for salmon in their early growth stages. Timber harvesting has become a vestigial economic activity employing few people that contributes little to the regional economy.

Restoring and rehabilitating the Tongass National Forest to its natural state is a Council goal. Decreasing the roadless area is contrary to this goal and will result in further environmental degradation.

**15. The Council questions the roadless inventory used in the DEIS analysis, including how it compares the amount of suitable old growth between the six alternatives.**

The Council would have preferred a full range of alternatives, including alternatives that would provide for corrections to errors in the current roadless designation and possible extension of the roadless designation. Our examination of the history of developing the roadless inventory indicates that a number of areas in the Tongass National Forest were left out of the 2001 inventory because they may have been designated for logging to supply timber to the Alaska Pulp contract. The Forest Service acknowledged this discrepancy in the 2003 FEIS. These areas may amount to as many as 350,000 acres. These areas are, in fact, roadless, and should be added to the inventory. These areas were included in the original TLMP Revision roadless inventory but deleted before the FEIS, even though they are still roadless. The Forest Service deleted them prematurely, after finishing site-specific EISs authorizing roads, but before any roads were built.

<b>Inventoried Roadless Area</b>	<b>Place Name of Wrongly Deleted Area</b>	<b>VCUs*</b>
Chichagof (#311)	Little Seal Cr.	230
	West Crab Bay and West Saltery Bay	231
		232
	Broad Finger Cr. and Crab Cr.	233
		246
Broad Cr.	246	
Hoonah Sound (#328)	Ushk Bay and Poison Cove	279
		280
		281
North Baranof (#330)	Saook Bay	294
East Kuiu (#245)	East Kuiu, including No Name Bay, Alvin Bay and Salt Lagoon	416
		417
		418
Neka Mt. (#342)	Neka Bay	201
Camden (#242)	Threemile Arm	419

\*VCU = Value Comparison Unit



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In addition, the Council believes that there may be other areas of the Tongass that were eroded early in the era of industrial timber development. In many areas, roads have been decommissioned and natural restoration and rehabilitation have taken place. We request that areas of the Tongass where no use of roads has taken place for 20 years be considered as additions to the roadless inventory. Examination of these areas would acknowledge that some developed areas may change back to roadless status. Areas should be evaluated on whether roads actually exist at this time and how closely these candidate areas exhibit and share the nine characteristics of the inventoried roadless areas found in the 2001 rule.

The Council questions the accuracy of the DEIS roadless inventory. We request that data and metadata be made available so that numbers presented can be independently verified. We also question the quantification of suitable old growth acres. Does suitable old growth acreages under different alternatives include the 350,000 acres listed above that are not in the roadless inventory? We cannot determine this from the DEIS.

Finally, since including the mistakenly omitted roadless acres (or excluding them) is a land use action that may significantly restrict subsistence uses, ANILCA Section 810 applies and its procedures need to be followed for this important amount of public land. The Council considers that, although the DEIS has not done any analysis of roadless classification of this area, opening these areas to roading and logging would likely have adverse effects on subsistence uses.

**16. The Council believes the DEIS should report expenditures and returns from past timber harvest and road building, as well as projected economic expenditures and returns from anticipated timber harvest.**

The DEIS needs to report expenditures and returns from past logging and road building done to date. There is a general perception that the industrial timber harvest that has taken place in Southeast Alaska was heavily subsidized by a Forest Service expenditure of public funds. Data presentation would either verify or disprove this perception. In any case, since the purpose of revising the 2001 Roadless Rule (should we say “eliminating it” as called for in the preferred alternative) is economic development, specifically of the timber industry, the DEIS needs to present a cost/benefit analysis of past logging and roadbuilding and an estimate of probable costs and benefits should the 2001 Roadless Rule be modified. The best information should be displayed in a chart by years that shows:

- a) Public expenditures for planning and timber harvest management
- b) Public expenditures for road building and road maintenance, and
- c) Cash return from timber sold

Finally, the DEIS should provide projected economic expenditures and returns from anticipated increased logging—the apparent objective of the exemption of Alaska to the 2001 Roadless Rule.

**17. The Council believes roadbuilding has been detrimental to fish and fish habitat and new road building would do the same.**

The Tongass National Forest has a long history with roadbuilding, particularly in conjunction with timber harvest. According to the State of Alaska Department of Transportation website, Prince of Wales Island alone contains more than 1,500 miles of roads, including 250 miles of paved or improved gravel roads that provides access between 10 communities. The total number of roads throughout the Tongass National Forest is not readily available. Currently, the Forest Service has inventoried over 3,600 fish crossing structures on 3,800+ miles of non-paved permanent roads and 900+ miles of temporary roads within the Tongass National Forest. Approximately 1,250 of these crossings are over anadromous fish streams, and 2,350 of the structures are over resident fish streams. On the anadromous fish streams, 187 of the inventoried culverts are classified as red pipes, meaning they are inadequate (by law) for anadromous fish passage. Further, 935 of the resident fish stream crossings are classified as red pipes. The estimated cost for removal and/or remediation of red pipes is between \$35,000 and \$120,000 per structure. This figure does not include subsequent potential stream restoration outside of the road corridor itself. Using the average cost of \$77,500 per structure, it will cost the Forest Service approximately \$6.5 to 14.5 million dollars to replace inadequate fish passage on anadromous fish streams on the Tongass National Forest alone. While many high priority stream crossings have been completed, there is still a backlog of inventoried red pipes on existing roads within the Tongass National Forest. The Council believes that adding new roads will only compound this issue.

Prior to the implementation of stream buffers, it was not unusual for logging to occur up to streambanks. The 100-foot stream buffer was implemented on the Tongass National Forest through the Tongass Timber Reform Act in 1990, well after the timber industry boom in the 1970s and 1980s in Southeast Alaska. Research has shown that stream buffers are critical for healthy fish populations. Without them, streambank erosion and sediment loading becomes problematic for aquatic species. Buffers are also important for regulating stream temperatures and for large wood recruitment that provides stream structure for spawning and rearing fish. At ANILCA Section 810 subsistence hearings for the Alaska Roadless Rule, subsistence users spoke out about the inadequacies of 100-foot stream buffers. Wind throw is a predominant problem with such narrow stream buffers, reducing the protections that they were intended to provide. Another point consistently heard from the public is how existing roads, particularly on steep slopes, that have not been adequately maintained continue to be problematic with respect to sediment loading. The Council shares the concerns expressed in these subsistence hearings and believes that current indirect effects paired with any new road building represents an adverse impact to subsistence users.

**18. The Council does not support the proposed change in the Roadless Area Value and Characteristics.**

At our Council meeting in Ketchikan, November 5 to 7, 2019, Deputy Chief Forester Chris French stated that the “Proposed Definitions”, including the nine Roadless Area Characteristics, came from The State of Alaska Citizens’ Advisory Committee. We question whether incorporating recommendations from this group is legal. Our reading of the Federal Advisory

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Committee Act (FACA) indicates that a group needs to be authorized as a chartered FACA committee to provide this type of recommendation.

The Council notes that the proposed definitions depart drastically from the definitions found in the 2001 Roadless Rule. The DEIS does not show or describe the proposed changes or provide a rationale for changing definitions from those that have worked well for 18 years. The Roadless Area Characteristics from the 2001 Roadless Rule can be found at:

<https://www.govinfo.gov/content/pkg/FR-2001-01-12/pdf/01-726.pdf>, and is reproduced below:

***“Roadless Area Values and Characteristics***

*Inventoried roadless areas considered in this rule constitute roughly one-third of all National Forest System lands, or approximately 58.5 million acres. Although the inventoried roadless areas comprise only 2% of the land base in the continental United States, they are found within 661 of the over 2,000 major watersheds in the nation (FEIS Vol. 1, 3–50) and provide many social and ecological benefits. As urban areas grow, undeveloped private lands continue to be converted to urban and developed areas, and rural infrastructure (such as roads, airports, and railways). An average of 3.2 million acres per year of forest, wetland, farmland, and open space were converted to more urban uses between 1992 and 1997. In comparison, 1.4 million acres per year were developed between 1982 and 1992. The rate of land development and urbanization between 1992 and 1997 was more than twice that of the previous decade, while the population growth rate remained fairly constant (FEIS Vol. 1, 3–12). In an increasingly developed landscape, large unfragmented tracts of land become more important. For example, from 1978 to 1994, the proportion of private forest ownerships of less than 50 acres nearly doubled (Birch, T.W. 1996. Private forest-land owners of the United States, 1994. Resource Bulletin NE-134. Radnor, PA: USDA Forest Service, Northeastern Experiment Station. 183 p). Subdivision and other diminishment of tract size of these lands can discourage long-term stewardship and conservation.*

*Inventoried roadless areas provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species. Inventoried roadless areas provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research (FEIS Vol. 1, 1–1 to 1–4).”*

The following values or features often characterize inventoried roadless areas (FEIS Vol. 1, 3–3 to 3–7):

1. *“High quality or undisturbed soil, water, and air. These three key resources are the foundation upon which other resource values and outputs depend.*

2. *Healthy watersheds catch, store, and safely release water over time, protecting downstream communities from flooding; providing clean water for domestic, agricultural, and industrial uses; helping maintain abundant and healthy fish and wildlife populations; and are the basis for many forms of outdoor recreation. Sources of public drinking water. National Forest System lands contain watersheds that are important*
3. *sources of public drinking water. Roadless areas within the National Forest System contain all or portions of 354 municipal watersheds contributing drinking water to millions of citizens. Maintaining these areas in a relatively undisturbed condition saves downstream communities millions of dollars in water filtration costs. Careful management of these watersheds is crucial in maintaining the flow and affordability of clean water to a growing population. Diversity of plant and animal communities.*
4. *Roadless areas are more likely than roaded areas to support greater ecosystem health, including the diversity of native and desired nonnative plant and animal communities due to the absence of disturbances caused by roads and accompanying activities. Inventoried roadless areas also conserve native biodiversity by serving as a bulwark against the spread of nonnative invasive species.*
5. *Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land. Roadless areas function as biological strongholds and refuges for many species. Of the nation's species currently listed as threatened, endangered, or proposed for listing under the Endangered Species Act, approximately 25% of animal species and 13% of plant species are likely to have habitat within inventoried roadless areas on National Forest System lands. Roadless areas support a diversity of aquatic habitats and communities, providing or affecting habitat for more than 280 threatened, endangered, proposed, and sensitive species. More than 65% of all Forest Service sensitive species are directly or indirectly affected by inventoried roadless areas. This percentage is composed of birds (82%), amphibians (84%), mammals (81%), plants (72%), fish (56%), reptiles (49%), and invertebrates (36%).*
6. *Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation. Roadless areas often provide outstanding dispersed recreation opportunities such as hiking, camping, picnicking, wildlife viewing, hunting, fishing, cross-country skiing, and canoeing. While they may have many Wilderness-like attributes, unlike Wilderness the use of mountain bikes, and other mechanized means of travel is often allowed. These areas can also take pressure off heavily used wilderness areas by providing solitude and quiet, and dispersed recreation opportunities.*
7. *Reference landscapes. The body of knowledge about the effects of management activities over long periods of time and on large landscapes is very limited. Reference landscapes of relatively undisturbed areas serve as a barometer to measure the effects of development on other parts of the landscape. Natural appearing landscapes with high scenic quality.*
8. *High quality scenery, especially scenery with natural-appearing landscapes, is a primary reason that people choose to recreate. In addition, quality scenery contributes directly to real estate values in nearby communities and residential areas.*

9. *Traditional cultural properties and sacred sites. Traditional cultural properties are places, sites, structures, art, or objects that have played an important role in the cultural history of a group. Sacred sites are places that have special religious significance to a group. Traditional cultural properties and sacred sites may be eligible for protection under the National Historic Preservation Act. However, many of them have not yet been inventoried, especially those that occur in inventoried roadless areas.*
10. *Other locally identified unique characteristics. Inventoried roadless areas may offer other locally identified unique characteristics and values. Examples include uncommon geological formations, which are valued for their scientific and scenic qualities, or unique wetland complexes. Unique social, cultural, or historical characteristics may also depend on the roadless character of the landscape. Examples include ceremonial sites, places for local events, areas prized for collection of non-timber forest products, or exceptional hunting and fishing opportunities.”*

The Alaska Roadless Rule DEIS proposes the following:

- “Roadless Area Characteristics -- Resources or features that are often present in and characterize Alaska Roadless Areas, including*
1. *Physical Environment -- Roadless areas provide high-quality or undisturbed soil, water, and air.*
  2. *Water -- Roadless areas provide a variety of water resources including public drinking water sources, fish and aquatic resources, and hatchery aquatic resources.*
  3. *Diversity -- Roadless areas support a diversity of plant and animal communities including stands of old-growth forests.*
  4. *Habitat -- Roadless areas are expansive areas where high-quality intact habitat exists and ecosystems function with all their native species and components. Roadless areas serve as habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land.*
  5. *Remoteness -- Roadless areas provide economic opportunity due to rich primitive, semi-primitive motorized, and semi-primitive non-motorized classes of dispersed recreation.*
  6. *Landscape -- Roadless areas provide reference landscapes of relatively undisturbed areas that serve as a barometer to measure the effects of development on other parts of the landscape.*
  7. *Scenery -- Roadless areas have natural-appearing landscapes with high-scenic qualities that people value.*
  8. *Cultural -- Roadless areas are rich in traditional cultural properties and sacred sites. In Alaska indigenous peoples have been on national forests for more than 10,000 years and the forests have cultural significance.*
  9. *Locally-unique characteristics. Roadless areas represent geographic areas with additional locally-unique characteristics specific to Alaska including: (a) important source of subsistence resources including terrestrial wildlife, waterfowl, mammals, fish, and plant-based resources; (b) rich habitat that supports multiple species of fish for personal, subsistence, sport, recreation, and commercial harvest; and (c) supports*

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*diverse economic opportunity that is especially important for rural community well-being.*”

In general, the proposed changes lack the specificity of the existing original legal definitions in the 2001 Roadless Rule and greatly weaken the definitions as plan and management tools. The changes are obvious, so we will not spend much time examining them. We do note, however, that the original 2001 definitions in #4 discussed the importance of roadless areas for threatened and endangered species (note that the Alexander Archipelago wolf has been a species of concern in Game Management Unit 2) and #8 recognized traditional cultural properties and sacred sites. Changes to #8 show disrespect to Southeast Alaska recognized Tribes and their cultural traditions.

**19. The Council questions the use of recommendations from the State of Alaska working group.**

The Council raised this issue in our July 10, 2019 comment letter to Alaska Regional Forester David Schmid, Tongass Forest Supervisor Earl Stewart, and Region 10 Planning Director Chad VanOrmer. Please refer to these comments on the FACA applicability. These comments are appended and included as part of our Council comments on the Alaska Roadless Rule DEIS. In essence, the Council questions relying on the State of Alaska working group recommendations in drafting the DEIS. We believe that this is a FACA violation and that the DEIS team played fast and loose in accepting and incorporating recommendations from this and perhaps other cooperating groups. FACA is designed to encourage transparent decision making. Without FACA protections, planning processes, while claiming to be open processes, can all too easily be high-jacked by special vested interests that stand to gain financially or otherwise when the federal government accepts their recommendations. The Council questions the standing of the working group and the apparent deference being given to this special interest group at the expense of the residents of Southeast Alaska.

**20. The Council believes that the Southcentral Regional Advisory Council should have been engaged in the public process in order to comment on how the Proposed Rule would affect the Chugach National Forest**

Chapter 2 of the DEIS (Alternatives including the Proposed Action) on page 2-3 includes “Proposed Alaska Roadless Boundary Correction and Modification Provisions.” This states that Alternatives 2-5 would include administration correction and modification provisions for inclusion in the proposed Alaska Roadless Rule to provide for future boundary and classification changes. This would apply to both the Tongass and Chugach National Forests. Further, if Alternative 6 were implemented, the provision would only apply to the Chugach National Forest. On page 1-2 of the DEIS, under Scope and Applicability, it is further stated that:

*“The one exception is that a single administrative provision concerning boundary corrections and modifications would be made applicable to IRAs designated by*

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*the 2001 Roadless Rule on the Chugach National Forest to align practices with other states that have state-specific roadless rules (Idaho and Colorado). This provision is administrative in nature and does not have any environmental effects.”*

While the change may be administrative and, therefore, not have environmental effects, it is in essence a change under the rulemaking process (stated in Appendix G under Alternative 6 on page G-39):

*§294.51 Chugach National Forest.*

*“(a) Administrative correction or modification of inventoried roadless area designations on the Chugach National Forest may be made as follows:*

*(1) Administrative corrections to boundaries. The Regional Forester for the Alaska Region may issue administrative corrections to the boundaries of an Inventoried Roadless Area after a 30-day public notice and opportunity to comment period. Administrative corrections are limited to adjustments that remedy clerical errors, typographical errors, mapping errors, improvements in mapping technology, conformance to statutory or regulatory changes, or incorporation of changes due to land exchanges.*

*(2) Administrative modifications to Classifications and Boundaries. The Regional Forester for the Alaska Region may issue modifications to the classifications and boundaries of an Inventoried Roadless Area after a 45-day public notice and opportunity to comment period.”*

The Chugach National Forest falls within the Southcentral Region of the Federal Subsistence Management Program, and has its own Regional Advisory Council. During the scoping period for the Alaska Roadless Rule, comments were received specifically requesting the Chugach National Forest continue to be protected under the 2001 Roadless Rule (Written Public Comment Summary, February 2019). It is unclear how the Forest Service and/or the Secretary of Agriculture plan to engage in the public process of rulemaking, but to date there does not appear to be any engagement outside of what occurred during the initial scoping period. The Southcentral Regional Advisory Council, as a FACA committee, should have been consulted about potential changes to the 2001 Roadless Rule as it applies to the Chugach National Forest.

**21. The Council would have appreciated more than two hours with the Alaska Roadless Rule team during their 2019 Fall meeting.**

The Council has serious concerns about the effects on subsistence users caused by changes to the 2001 Roadless Rule. It is important to note that the purpose and need statement for the DEIS says that a “durable and long lasting regulation” for the management of roadless areas in the Tongass National Forest is the desired outcome of this process. Given the expected durability and long life of the proposed exemption of the 2001 Roadless Rule, the impacts to subsistence become more acute. Unfortunately, this process has been on a fast-track ever since the State of Alaska filed its petition, and the Council and public have been frustrated in their efforts to

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analyze and respond to the DEIS. At our Council meeting on November 5-7, 2019, we had an opportunity to question Deputy Chief Forester Chris French and Region 10 Planning Director Chad VanOrmer in order to help craft our comments on the proposed rule. Given the time constraints on the Alaska Roadless Rule team, only two hours were allotted for their presentation and our questions. We feel that this was inadequate given the importance and complexity of the issues. The Council also heard testimony from members of the public attending informational meetings and the subsistence hearings (which were happening while the Council was meeting the week of November 4<sup>th</sup>) who also felt that they were not given enough time to “digest” the information presented and provide more substantial comments.

**22. The Council believes the Alaska Roadless Rule planning effort should remain in the Alaska Region.**

The Council questions the reasoning of taking this important rule making and NEPA planning effort out of the hands of the Forest Service’s Regional Forester for Alaska Region and the Tongass National Forest Supervisor’s office. The Council appreciates the continuing efforts of the Regional Forester and Tongass National Forest Supervisor’s office in supporting subsistence uses of fish and wildlife, and in developing productive relationships with the Southeast Regional Advisory Council, the Southeast Region’s Federally recognized Tribes, and the region’s rural communities. The residents of Southeast Alaska do what they can to keep the Council informed and aware of Forest Service actions and policies, and they solicit our input on important changes and policies. While the Council clearly does not always agree with our local Forest Service’s actions and directions, at the end of the day we are all Southeast Alaska residents and share our love for the amazing, though stressed, national forest and the sustainable resources it provides. The DEIS and the planning effort has had only limited involvement from our Region 10 and Tongass National Forest staff. This diminishment of authority and responsibility is highly unusual. The rule revision has been directed from Washington D. C. with the Secretary of Agriculture, Mr. Sonny Perdue, as the deciding officer. This speaks volumes about how this planning effort disrespects the residents of Southeast Alaska, the very people that will have to live with the detrimental, and entirely unnecessary, effects caused by changing the 2001 Roadless Rule. We also lament the disrespect shown to our Alaska-based Forest Service staff and hope that this unnecessary usurpation of their authority will not damage their relationships with the residents of Southeast Alaska and the organizations that represent them.

The Council would like to thank you for the time you and your team have taken to consider our comments on the Alaska Roadless Rule DEIS and the proposed change to the Alaska Roadless Rule. The Council feels that the DEIS is inadequate and should be withdrawn based on the failures outlined. In lieu of a withdrawal, we would appreciate the opportunity to remain engaged throughout the next steps, and, as a FACA committee, remind you that we are here to help ensure that the needs of the subsistence users in Southeast Alaska are met.



Regional Forester Schmid

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Sincerely,



Donald Hernandez  
Chair

**Enclosures:**

March 5, 2019 Southeast Council letter to Roadless Rule team  
July 10, 2019 Southeast Council letter to Forester David Schmid  
November, 19, 2019 Tribes letters to the Alaska Delegation (3)  
November 19, 2018 Tribes letter to Secretary Perdue

**cc: Federal Subsistence Board**

**Southeast Alaska Subsistence Regional Advisory Council Members**  
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
Greg Risdahl, Acting Deputy Assistant Regional Director  
Office of Subsistence Management  
Suzanne Worker, Acting Subsistence Policy Coordinator  
Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Tom Kron, Acting Supervisory Program Analyst, Office of Subsistence Management  
DeAnna Perry, Southeast Alaska Subsistence Regional Advisory Council Coordinator  
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Chairman  
c/o Office of Subsistence Management  
1011 E. Tudor Rd., MS 121  
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**MAR 05 2019**

Alaska Roadless Rule  
USDA Forest Service, Alaska Region  
Ecosystem Planning and Budget Staff  
P.O. Box 21628  
Juneau, AK 99802-1628

USDA - USFS Regional Office  
ATTN: Regional Forester, Dave Schmid  
P.O. Box 21628  
Juneau, AK 99801-1807

USDA - USFS Tongass National Forest  
ATTN: Forest Supervisor, Earl Stewart  
648 Mission Street  
Ketchikan, AK 99901-6591

**RE: Subsistence Regional Advisory Council comments on Roadless Rulemaking**

**Dear Mr. Schmid, Mr. Stewart, and Roadless Rulemaking Team:**

**I am writing on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council) to express our concern for the impacts that the proposed Alaska roadless rulemaking (Proposed Rule) may have on subsistence uses throughout the Tongass National Forest. The Council has valuable, relevant knowledge on this issue and wishes to provide input on potential significant restrictions of subsistence uses that may result from the Proposed Rule.**

The Council was formed under Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act (FACA). The Council's charter establishes its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska region (ANILCA §805). The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

### **Public Comment Periods are Hindering Council Substantive and Timely Input**

The scoping public comment period for the Proposed Rule closed the day before the Council's publicly-noticed meeting in Sitka on October 16-18, 2018. No extensions to the public comment period were granted and the Council did not have an opportunity to provide public comment as a FACA committee. This is important to note as the Council may only submit public comments that are developed on the record at a publicly-noticed meeting.

It is the Council's understanding that the next public comment period will likely occur in the summer of 2019. This comment period falls between the winter and fall meetings of the Council. Unless the Council is authorized to call an out-of-cycle meeting, the Council will be deprived of the opportunity to receive information on the proposed alternatives, ask questions and deliberate on the information, and develop comments on impacts to subsistence resources. This hindering of the Council's ability to participate is a direct result of the agency's unusually-accelerated review under the National Environmental Policy Act.

### **ANILCA §805 Provides For Local & Regional Participation**

Congress, through enacting Section 805 of ANILCA, has recognized that this Council has specialized knowledge and should have a meaningful role in providing input on any significant restrictions of subsistence uses, as well as providing information to minimize adverse impacts on subsistence uses and resources. As a FACA committee, the Council is obligated to conduct its activities in public in order to develop important comments on subsistence issues.

Since the national 2001 Roadless Rule was adopted, the Federal Subsistence Management Program and this Council have learned much more about subsistence. At its bi-annual meetings, the Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. Through the years, the Council has heard scientific evidence from various sources regarding the impacts of timber harvests, the building of roads, and development on natural food resources in the Southeast. The Council has received testimony from subsistence users, conveying local and traditional ecological knowledge. Combined with the knowledge and awareness of the Council members themselves, who were appointed by the Secretaries of the Interior and Agriculture due to their regional expertise on fish and wildlife resources and subsistence, this Council is equipped with a wealth of information for the region that needs to be included in the analysis conducted on this matter for the Draft Environmental Impact Statement (DEIS).

## **Initial Comments**

With the understanding of the unique role this Council has in providing a voice for subsistence uses and resources, the Council submits these comments for consideration. Initial comments are based on years of testimony and discussion concerning development and its impact on subsistence resources:

1. For any areas where the use of public lands are proposed for change, special effort should be made to determine in which tribal and clan territories these lands lay. At a bare minimum, analysis should show the clan and tribal territories in the inventoried roadless areas. Since 2001, there has been substantial growth of community and tribal expertise on land use matters and these tribes and communities should be involved in the development of alternatives for the Proposed Rule.
2. There is a perception that the Governor's Citizen Advisory Committee is developing alternatives for the Proposed Rule. The Council is concerned that this input may be the main force in presenting alternatives and it questions the legal and scientific validity of any alternatives developed by citizen advisory councils that may be primarily concerned about economic interests at the expense of scientific research and facts. The Council is not aware of any legal authority that would provide this State advisory committee the ability to drive alternatives for this Federal action.
3. Due to the accelerated timeline of this rulemaking process, the Council's ability to provide comments may be severely limited. Comment periods are expected to occur in summertime, when most Council members are engaging in subsistence activities and not available to meet. As a rule summertime in Southeast Alaska is not a convenient time for conducting public hearing or requesting public comments from rural subsistence users.
4. The Council has specific comments on potential impacts on subsistence resources, based on anticipated potential development as a result of an "Alaska Roadless Rule." Our concerns are identified as follows:
  - a. **Old-Growth Forest Protection.** The current Rule protects some of the last old-growth temperate rainforests in the entire United States. The Proposed Rule attempts to alter this successful conservation policy on an expedited timeline. There is no need to develop a state-specific roadless rule focused on the Tongass National Forest or to provide different management designations to further Alaska's economic development or other needs.
  - b. **Development.** Over the years, this Council has heard testimony from land management personnel who have shared their research and reports regarding timber harvest and development and the associated impacts on habitat and abundance of subsistence resources. These known effects adversely affect the success of subsistence users and impact subsistence resources.

- c. **Road Development.** Prince of Wales Island (POW) is the most heavily-roaded island in the region. This has produced several negative impacts to subsistence resources related to access, development, and timber harvest. Subsistence users have shared their local and traditional ecological knowledge with the Council. The Council is also knowledgeable about pre-development habitat and resource with abundance. The Council should be afforded the opportunity to provide this specific information for consideration in any alternatives developed for the Proposed Rule.
- d. **Logging.** Over a million acres have been logged on Prince of Wales Island. Residents are worried about deer habitat, particularly winter habitat, which requires old-growth timber. Many areas are already logged and the high timber harvest rate significantly impacts habitat for deer and other wildlife. There has been a decline in the amount of deer on Prince of Wales Island. This is expected to continue for years to come.
- e. **Ecosystem.** Healthy old-growth forests are vital to salmon spawning streams. They are also more effective at absorbing carbon dioxide than a forest that has been clear cut. There is a great amount of community interest throughout the Southeast concerning the future of the Tongass National Forest, especially regarding the effects of access and development on the overall forest ecosystem.
- f. **Access.** Changes to the Proposed Rule, which alter the boundaries or areas of available public land, will directly affect the area available for subsistence uses. If the amount of public land available for subsistence opportunity is effectively decreased, subsistence users may be required to travel farther to hunt, fish, and forage. This would have a Tongass-wide impact and could create user conflicts and displacement of user groups for access to subsistence resources.

### **Request for Information at the Council's Next Meeting**

The Council requests a briefing on the Proposed Rule at its next meeting in Wrangell on March 19-21, 2019. Specifically, the Council requests information on alternatives identified and anticipated impacts, as well as the preferred alternative so that members may deliberate and offer specific comments. This would negate the need, time, and expense for a special Council meeting to be called in summer activities while most Council members are fishing and engaging in other subsistence activities.

### **Conclusion**

The change in the current Roadless Rule will invariably affect the availability of subsistence resources and continued subsistence opportunity. Reasonable steps must be taken to minimize adverse impacts upon subsistence uses and resources resulting from the Proposed Rule. The

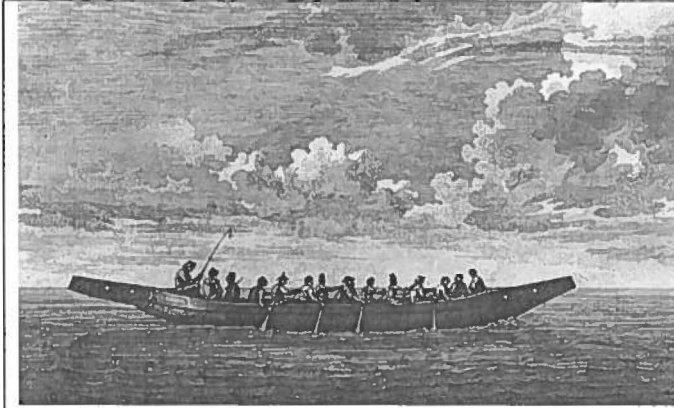
**Council appreciates the opportunity to convey its concerns regarding the effect this rule may have on the food resources that many of our Southeast Alaska families depend upon. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-586-7918 or [dlperry@usda.gov](mailto:dlperry@usda.gov).**

**Sincerely,**



**Donald Hernandez  
Chair**

**cc: Ken Tu, Interdisciplinary Team Leader, Alaska Roadless Rule, USDA Forest Service  
Federal Subsistence Board  
Southeast Alaska Subsistence Regional Advisory Council  
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
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Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record**



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

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RAC/SE 19023.DP

**JUL 10 2019**

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Dear Messrs. Schmid, Stewart and VanOrmer:

The Southeast Alaska Subsistence Regional Advisory Council (Council) would like to thank you for the USDA – Forest Service (Forest Service) Regional Forester’s response letter of April 16, 2019, and appreciates the opportunity to continue the conversation regarding the proposed Roadless Area Conservation Rule; National Forest System in Alaska (Roadless Rule) and its potential impacts on subsistence resources in this region.

In the Alaska National Interest Lands Conservation Act (ANILCA), Congress recognized that Subsistence Regional Advisory Councils have specialized knowledge about subsistence uses in their respective regions and should have a meaningful role in providing input on any significant restrictions to these uses. For several years, the Council has reviewed numerous resource management actions and received significant and relevant statements from the public on how

Messrs. Schmid, Stewart and VanOrmer

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these actions may impact subsistence resources critical to those users. Since its inception, this Council has regularly tracked Forest Service land use action plans and has weighed in on actions that could have significantly restricted subsistence uses. The major legal protection for subsistence uses of fish and wildlife on Federal public lands and waters in Alaska is provided through ANILCA Section 810. Essentially, this section of ANILCA requires Federal agencies to examine the effects of possible land use actions on subsistence uses. To do this, Federal agencies are mandated by law to provide adequate data documenting subsistence uses and possible effects on those uses.

As you are aware, information regarding the Alaska Roadless Rulemaking process was presented to the Council at its last two public meetings. We received reports from the Forest Service, as well as heard public and Council member testimony concerning the Forest Service's intention to revise the very successful and well-received Roadless Rule. We would like to supplement our initial comments made to you via correspondence dated March 5, 2019, by sharing further details. The Council is compelled to contribute this information in an effort to "work together to develop an Alaska Roadless Rule that responds to the needs of all Southeast Alaska residents," a view that has been shared in the past by the Regional Forester.

Due to the importance of wild resources for subsistence uses on the Tongass National Forest, the experience of Council members in forest management issues, the drastic cumulative effects to subsistence uses of past Forest Service road building and resource extraction, and the public comments received at our public meetings, our comments and recommendations on this issue are necessarily lengthy.

This Council strongly opposes changes to the existing Roadless Rule that has successfully provided protection for subsistence uses. The existing Roadless Rule has also limited further degradation and diminution of the Tongass National Forest resources upon which subsistence users in Southeast Alaska depend. Changes to the existing Rule are not needed and will invariably affect the availability of subsistence resources and continued subsistence opportunities.

Our detailed comments follow:

1. **Federal Advisory Committee Act (FACA) concerns.** The Council understands that the Forest Service entered into a cooperative agreement with the State of Alaska (State). The State convened a public body, the Alaska Roadless Rule Citizen Advisory Committee (Committee), to provide recommendations for state-specific roadless rule that will determine roadless areas essential for infrastructure, timber, energy, mining, access and transportation to further Alaska's economic development. The Committee's work was facilitated by Meridian Institute which is headquartered in Washington D.C. The Committee submitted a report outlining four potential options, including a range of potential changes to inventories of roadless areas in the Tongass National Forest. These options were passed on to the state cooperating agency team to provide as input to the Forest Service rulemaking process. In the Council's opinion, the advisory Committee is doing exactly that: advising the Federal government and suggesting action alternatives. The Committee reports produced for this effort lacked subsistence (or environmental) information and appeared to represent the



remnant timber industry rather than a representative cross section of Southeast Alaska residents and communities. The Council believes that FACA may require that a group formed to advise the Federal government be a chartered committee with a designated Federal official, fulfilling the notice and reporting requirements of the law.

**2. Rulemaking development.** The Council notes that proposed revisions to the successful Roadless Rule were contracted out and appear to involve only two professional Forest Service staff from the Tongass National Forest. We also note that decision-making authority was taken from the region, instead handled by the Secretary of Agriculture and fast tracked, requiring staff to work on this project during the December 2018 Federal government shutdown. The timing of the release of the Draft Environmental Impact Statement and short comment period does not accommodate significant public input. These actions give the impression that significant changes in the existing Roadless Rule are being steamrolled over the concerns, interests, and desires of a large number of Southeast Alaska residents.

**3. ANILCA Section 810 determinations.** In March 2019, Alaska Roadless Public Engagement Coordinator Nicole Grewe stated in her testimony before the Council that the Forest Service does not believe that ANILCA Section 810 requirements apply to the rule-making process regarding this major land use action. We unequivocally disagree with this opinion.

In ANILCA Section 810, the law provides for the assessment of impacts to subsistence uses from Federal agency actions. The Federal government does not have a free hand to degrade or diminish subsistence resources, which could make subsistence harvesting difficult or impossible.

ANILCA Section 810 outlines states the following requirements:

- a. In determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands under any provision of law authorizing such actions, the head of the Federal agency having primary jurisdiction over such lands or his designee shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs, the 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. No such withdrawal, reservations, lease, permit, or other use, occupancy or disposition of such lands which would significantly restrict subsistence uses shall be effected until the head of such Federal agency—
  - (1) gives notice to the appropriate State agency and the appropriate local committees and regional councils established pursuant to section 805;
  - (2) gives notice of, and holds, a hearing in the vicinity of the area involved; and
  - (3) determines that – (A) such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the utilization of the public lands, (B) the proposed activity will involve the minimal amount of public lands necessary to

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accomplish the purposes of such use, occupancy, or other disposition, and (C) reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions.

b. If the Secretary is required to prepare an environmental impact statement pursuant to section 102(2)(C) of the *National Environmental Policy Act*, he shall provide the notice and hearing and include the findings required by subsection (a) as part of such environmental impact statement.

c. Nothing herein shall be construed to prohibit or impair the ability of the State or any Native Corporation to make land selections and receive land conveyances pursuant to the *Alaska Statehood Act* or the *Alaska Native Claims Settlement Act*.

d. After compliance with the procedural requirements of this section and other applicable law, the head of the appropriate Federal agency may manage or dispose of public lands under his primary jurisdiction for any of those uses or purposes authorized by this Act or other law.

The Council believes that the Roadless Rule revision is exactly the sort of land use action that is covered by Section 810, since subsistence resources and uses are likely to be adversely affected as a result of all alternatives that call for more road building and timber harvest in the Tongass. The Council would like to see the following:

a. Decision documents must include adequate data on subsistence uses and likely future impacts on subsistence uses. Data and analysis must include evaluation of cumulative effects of past timber harvest.

b. If data and analysis show that a proposed land use decision may significantly restrict subsistence uses, a determination to this effect is made by the Federal agency. This determination needs to spell out likely/expected effects. If there is a positive 'Section 810 determination,' the Federal agency must hold hearings.

c. Formal Section 810 hearings are required in potentially affected communities. Hearings are different from public informational meetings. These typically have a hearing officer, may produce a transcript or recordings of hearings, and a hearing summary or record.

d. After hearings the decision maker may cancel the proposed action, if it is detrimental to subsistence uses. The decision maker could proceed with an action that impacts subsistence uses. In the second case, the decision maker must show that **such a significant restriction of subsistence uses is necessary and consistent with sound management principles for the utilization of the public lands** (and other conditions in the law). In this Council's view, trying to resuscitate the Southeast's moribund timber industry is not "necessary."

The Council believes this process would best serve the Section 810 analysis/evaluation requirement by analyzing the potential and significant direct, indirect, and cumulative impacts to subsistence uses. Specifically, if access is expanded in the proposed Roadless Rule alternatives, the Council would like to see the following addressed:

**Direct impacts:** rural residents subsist on deer and it is the most important subsistence species in this region;

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**Indirect impacts:** previous clear-cut areas harvested at unsustainable rates have had a significant impact on deer productivity; and

**Cumulative impacts:** deer winter habitat need further analysis and evaluation. A Section 810 analysis would help supply this needed baseline information

ANILCA Section 810 was subject to litigation in the 1980s and beyond. The Council expects that there will be further litigation, particularly as tribes move to protect clan and Kwaan territory and to maintain the fish and wildlife resources members need for subsistence.

The alternative chosen in the new Roadless Rule may reduce or eliminate the use of some Federal public lands currently covered under the existing 2001 Roadless Rule for the purposes of subsistence. All action alternatives hold the potential for development, logging, and other permitted uses of the original Roadless Rule on Federal public lands. Lastly, if the proposed Rule alters the boundaries of the roadless areas in any way, this would constitute a disposition of public lands because it would remove those lands from the Tongass National Forest Federal public lands subject to the Federal subsistence priority provided in ANILCA. The Council believes that the increased restrictions of subsistence uses caused by this proposed Roadless Rule are not necessary and are not consistent with sound management principles for the utilization of Federal public lands.

**4. Carbon sequestration, carbon credit economics, Tongass carbon inventory.** The Tongass National Forest may not be suitable for further logging, but the forest is a national treasure for carbon sequestration. The earth is warming partly because of the increase in carbon dioxide and other greenhouse gasses from human use of fossil fuels, deforestation, animal husbandry, and use of other finite natural resources by Earth's 7.7 billion people.

As the nation's largest national forest, the Tongass is also the nation's largest carbon reservoir. The forest has the capability, particularly as extensive clear cut areas refoliate, to hold even more carbon. It is in the national interest to maintain and enhance the Tongass National Forest for sequestering of atmospheric carbon. Limiting or eliminating further carbon releases from the Tongass through defoliation and removal of biomass should be encouraged.

Interestingly enough, recent sales of carbon credits by Sealaska and Kootsnoowoo Corporations, as well as other carbon trading opportunities, provide data to estimate the economic value of the carbon currently sequestered in the forest. Furthermore, examining the effects of the proposed Roadless Rule revisions on carbon sequestration could provide an economic metric for possible changes in economic worth of the Tongass National Forest.

An essential part of evaluating carbon sequestration, its value, and importance in mitigating climate change is to establish a carbon inventory for the Tongass National Forest. Such an inventory would include an estimate of carbon sequestered before the advent of industrial

Messrs. Schmid, Stewart and VanOrmer

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logging, a current inventory of carbon sequestered, and best estimates of the effects on carbon carrying capacity of proposed alternatives. The Council considers carbon carrying capacity to be a key value of the Tongass National Forest.

The Forest Plan needs to evolve with the reality of carbon sequestration and the economic value it can provide the Tongass National Forest. Carbon sequestration makes much more economic sense and allows for the continued harvest of fish and wildlife for nonwasteful subsistence uses, which pursuant to Section 804 of ANILCA is the priority consumptive use on Federal public lands in Alaska.

The National Environmental Policy Act (NEPA) requires a complete analysis of potential impacts and we believe that carbon sequestration, carbon credit economics, and a Tongass carbon inventory must be part of analysis for this proposed change.

**5. Foreseeable climate emergency.** The International Panel on Climate Change (IPCC) released its 6<sup>th</sup> assessment on October. 8, 2018. The United States released its Fourth National Climate Assessment (NCA) on November 23, 2018. Both reports document existing global warming and identify future effects of high global temperatures on world ecosystems. The NCA includes breakout information for Alaska.

The proposed Roadless Rule and Environmental Impact Statement should include analysis and discussion of what rapid climate change means for the Tongass National Forest. This analysis and discussion should consider local effects including: increased forest fire likelihood, rainfall changes that could limit salmon productivity, changes in vegetation patterns, diminished snow cover, increased weather extremes and variability, and possible massive tree blow down events from severe storms. In addition, the IPCC report calls for a 50 percent reduction in emission of greenhouse gases by about 2030, total elimination by 2050, and increased removal of greenhouse gases (including carbon sequestration strategies) as soon as possible.

Since climate changes are already upon us and because effects are likely to increase in the future, the Council believes that the proposed Roadless Rule revision must include a robust analysis and discussion of these possible future changes.

**6. Restoring and Rehabilitating the Tongass National Forest.** In the extensive wildlife planning for Prince of Wales Island completed some years ago, the Council identified restoring and rehabilitating the Tongass National Forest to its pre-logged state as a long-term policy goal needed to ensure continuation of subsistence uses. The Council recognized that ecological damage has been done and restrictions to subsistence uses have resulted from reduced availability of wildlife species, changed predator-prey-human relationships, diminished salmon returns, and altered vegetative composition and availability of subsistence plant foods.

Messrs. Schmid, Stewart and VanOrmer

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**7. Transition from Old Growth.** This Council has supported alternatives to timber clear-cuts and adaptive management strategies to improve renewable subsistence resources in the Tongass National Forest. Unfortunately, Council members see no evidence that a transition from harvesting old growth is taking place. Forest sales egregiously allow and encourage round log export of old growth and second growth. The current Roadless Rule protects some of the last old-growth forest but the proposed Roadless Rule would reverse this successful conservation policy.

**8. User Group Conflicts.** Numerous rural Alaskans live off the land, relying on fish, wildlife, and other wild resources. Many of these rural residents depend on access to public land for subsistence opportunities. At its last meeting, several Council members shared their traditional ecological knowledge of local conditions and access. If users are required to travel farther to hunt, fish, and forage, as a result of the proposed Roadless Rule, it will likely create conflicts between users for access to subsistence resources.

Thank you for the opportunity to comment on the development of the proposed Roadless Rule. The Council will provide additional comments upon receiving the Alaska Roadless Rule Draft Environmental Impact Statement. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry at (907) 283-7918 or via email at [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov).

Sincerely,



Donald Hernandez  
Chair

cc: Federal Subsistence Board

Kenneth Tu, Interdisciplinary Team Leader, Alaska Roadless Rule, USDA Forest Service

Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management

Thomas Whitford, Acting Deputy Assistant Regional Director

Office of Subsistence Management

Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management

George Pappas, State Subsistence Liaison, Office of Subsistence Management

Katerina Wessels, Acting Council Coordination Division Supervisor, Office of Subsistence Management

DeAnna Perry, Subsistence Council Coordinator, Office of Subsistence Management

Southeast Alaska Subsistence Regional Advisory Council

Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game

Interagency Staff Committee

Administrative Record

November 19, 2018

Sonny Perdue  
Secretary of Agriculture  
US Department of Agriculture  
1400 Independence Ave, SW  
Washington, DC 20250

RE: Alaska Roadless Rule

Since time immemorial, we, the indigenous peoples of Southeast Alaska, have enjoyed an intimate connection with *Haa Aani* (Our Land). The land and waters of our homelands are integral to, and inseparable from, our culture, community vibrancy, rural subsistence lifestyles, and economic opportunity. The signatory tribes have their roots in the Tongass National Forest and have continued to defend the integrity of our ancestral lands.

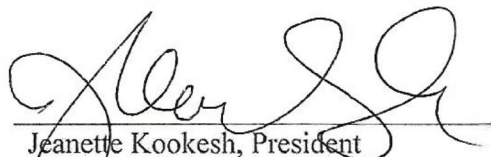
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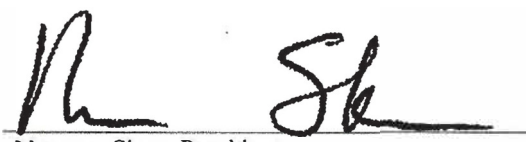
In an unprecedented show of unity, six federally recognized tribal governments stepped forward to engage as Cooperating Agencies in the Alaska Roadless Rule process with the State of Alaska and consult with the US Department of Agriculture. While some Tribal Cooperating Agencies advocated for the No Action alternative, others were working on finding a compromise that best fit their respective communities. No Tribal Cooperating Agency advocated for full-exemption, and their comments and participation were ignored and disregarded.

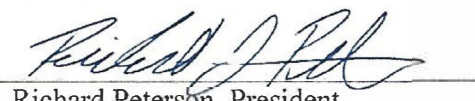
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Our tribal governments aim to work constructively with all elected officials of any political party without partisanship. We aim to be collaborative partners, working together in the best interest of Alaska- our homelands. Yet today we are challenged by our disagreement with elected officials that support the proposed full exemption of the Tongass National Forest from the Roadless Rule. Any elected official in Alaska who supports a full exemption, is disregarding their constituents, undermining the public process, and ignoring the sovereign Tribal governments.

We appreciate the opportunity to meet and discuss this issue with Undersecretary Hubbard during his visit to Juneau. We respectfully request an opportunity to meet and discuss this further with you, Secretary, as the decision maker on this important issue before a final decision is made. Gunalchéesh/Háw'aa, thank you for your consideration.

  
Jeanette Kookesh, President  
Angoon Community  
Association

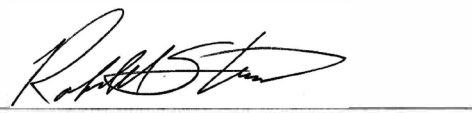
  
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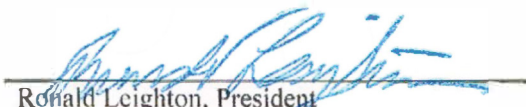
  
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Lee Wallace, President  
Organized Village of Saxman

  
Jaime Bricker  
Skagway Traditional Council

  
John Buller, President  
Yakutat Tlingit Tribe

November 19, 2019

The Honorable Lisa Murkowski  
522 Hart Senator Office Building  
Washington, DC 20510  
Fax: (202)-224-5301

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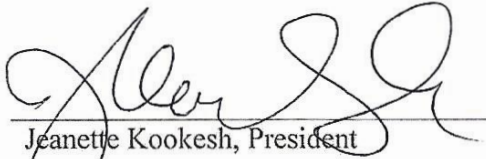
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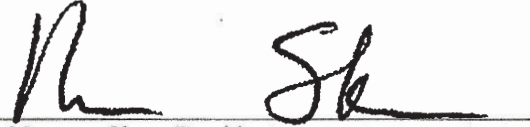
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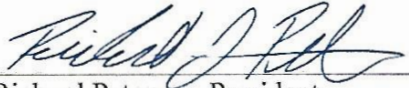




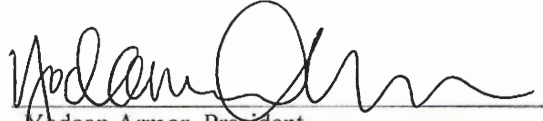
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Skagway Traditional Council



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November 19, 2019

The Honorable Dan Sullivan  
United States Senate  
702 Hart Senator Office Building  
Washington, DC 20510  
Fax: (202)-224-6501

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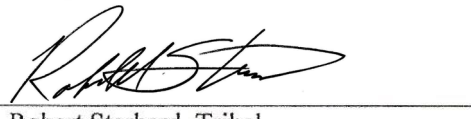
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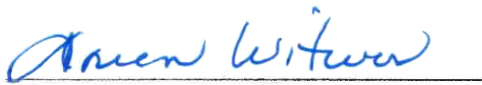
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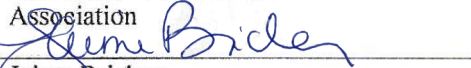
  
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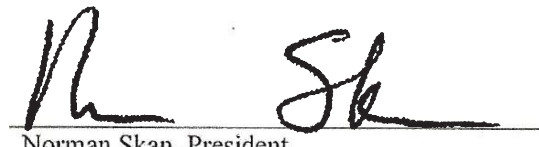
  
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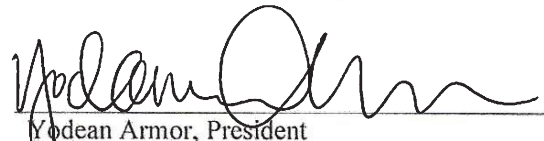
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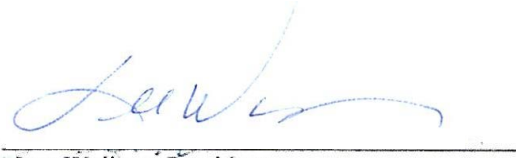
  
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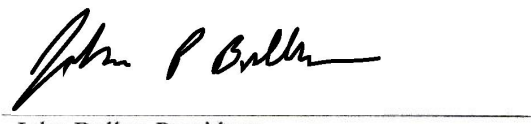
  
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November 19, 2019

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Committee on Natural Resources  
U.S. House of Representatives  
2314 Rayburn House Office Building  
Washington, DC 20515

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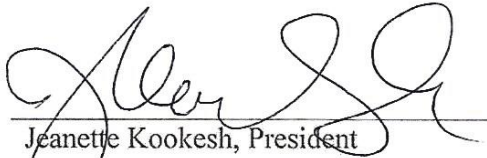
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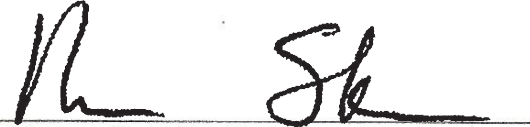
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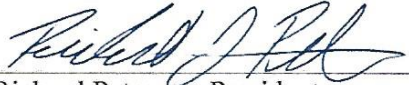
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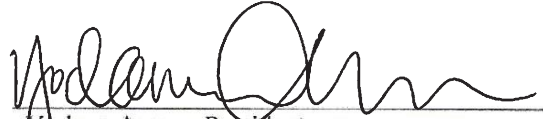
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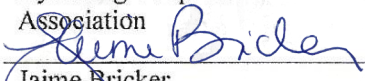
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Letter from the Federal Subsistence Board to Sonny Perdue, Secretary of Agriculture, dated Dec. 12, 2019



## Federal Subsistence Board

1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503 - 6199



FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

DEC 12 2019

OSM 19092.DP

The Honorable Sonny Perdue  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Mr. Secretary:

The Federal Subsistence Board (Board) received a copy of a letter from the Southeast Alaska Subsistence Regional Advisory Council (Council) that was sent to representatives of the U.S. Department of Agriculture – Forest Service (Forest Service) regarding the draft environmental impact statement (DEIS) prepared for the Proposed Alaska Roadless Rule.

The Council has requested that we forward this information to you. The Council has previously been involved in reviewing and evaluating management plans on the Tongass National Forest that may have substantial effects on subsistence uses of fish and wildlife in Southeast Alaska. The Council continues its commitment to provide information and comments on the development, amendment, and revision of land and resource management plans and to represent the interest of subsistence users regarding proposed regulations that may alter the ability to harvest and use resources on the Tongass National Forest.

The Council feels this information is vital to consider while deliberating the alternatives outlined in the DEIS.

Thank you for considering the Council's request on this issue.

Sincerely,

Anthony Christianson  
Chair

**Mr. Secretary**

**2**

**Enclosures**

**Southeast Regional Advisory Council Roadless DEIS Comments  
March 5, 2019 Southeast Council letter to Roadless Rule team  
July 10, 2019 Southeast Council letter to Forester David Schmid  
November, 19, 2019 Tribes letters to the Alaska Delegation (3)  
November 19, 2018 Tribes letter to Secretary Perdue**

**cc: Federal Subsistence Board**

**Thomas Doolittle, Acting Assistant Regional Director  
Office of Subsistence Management**

**Greg Risdahl, Acting Deputy Assistant Regional Director  
Office of Subsistence Management**

**Suzanne Worker, Acting Subsistence Policy Coordinator  
Office of Subsistence Management**

**George Pappas, State Subsistence Liaison, Office of Subsistence Management**

**Tom Kron, Acting Supervisory Program Analyst, Office of Subsistence Management**

**DeAnna Perry, Subsistence Council Coordinator, U.S. Forest Service**

**Southeast Alaska Subsistence Regional Advisory Council Members**

**Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game**

**Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game**

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**Administrative Record**



U.S. Fish and Wildlife Service  
Bureau of Land Management  
National Park Service  
Bureau of Indian Affairs

## Federal Subsistence Board Informational Flyer



Forest Service

**Contact:** Regulatory Affairs Division Chief  
(907) 786-3888 or (800) 478-1456  
subsistence@fws.gov

### How to Submit a Proposal to Change Federal Subsistence Regulations

Alaska residents and subsistence users are an integral part of the Federal regulatory process. Any person or group can submit proposals to change Federal subsistence regulations, comment on proposals, or testify at meetings. By becoming involved in the process, subsistence users assist with effective management of subsistence activities and ensure consideration of traditional and local knowledge in subsistence management decisions. Subsistence users also provide valuable wildlife harvest information.

A call for proposals to change Federal subsistence fishing regulations is issued in January of even-numbered years and odd-numbered years for wildlife. The period during which proposals are accepted is no less than 30 calendar days. Proposals must be submitted in writing within this time frame.

You may propose changes to Federal subsistence season dates, harvest limits, methods and means of harvest, and customary and traditional use determinations.

#### **What your proposal should contain:**

*There is no form to submit your proposal to change Federal subsistence regulations. Include the following information in your proposal submission (you may submit as many as you like):*

- Your name and contact information (address, phone, fax, or E-mail address)
- Your organization (if applicable).
- What regulations you wish to change. Include management unit number and species. Quote the current regulation if known. If you are proposing a new regulation, please state, “new regulation.”
- Write the regulation the way you would like to see it written in the regulations.
- Explain why this regulation change should be made.
- You should provide any additional information that you believe will help the Federal Subsistence Board (Board) in evaluating the proposed change.

1011 East Tudor Road MS-121 • Anchorage, Alaska 99503-6199 • subsistence@fws.gov • (800) 478-1456 / (907) 786-3888  
This document has been cleared for public release #0605132015.



**You may submit your proposals by:**

1. By mail or hand delivery to:  
Federal Subsistence Board  
Office of Subsistence Management  
Attn: Theo Matuskowitz  
1011 E. Tudor Rd., MS-121  
Anchorage, AK 99503
2. At any Federal Subsistence Regional Advisory Council meeting (A schedule will be published in the Federal Register and be announced statewide, bi-annually, prior to the meeting cycles)
3. On the Web at <http://www.regulations.gov>

Submit a separate proposal for each proposed change; however, do not submit the same proposal by different accepted methods listed above. To cite which regulation(s) you want to change, you may reference [50 CFR 100](#) or [36 CFR 242](#) or the proposed regulations published in the Federal Register: <http://www.gpoaccess.gov/fr/index.html>. All proposals and comments, including personal information, are posted on the Web at <http://www.regulations.gov>.

For the proposal processing timeline and additional information contact the Office of Subsistence Management at (800) 478-1456/ (907) 786-3888 or go to <http://www.doi.gov/subsistence/proposal/submit.cfm>.

**How a proposal to change Federal subsistence regulations is processed:**

1. Once a proposal to change Federal subsistence regulations is received by the Board, the U.S. Fish and Wildlife Service, Office of Subsistence Management (OSM) validates the proposal, assigns a proposal number and lead analyst.
2. The proposals are compiled into a book for statewide distribution and posted online at the Program website. The proposals are also sent out the applicable Councils and the Alaska Department of Fish and Game (ADF&G) and the Interagency Staff Committee (ISC) for review. The period during which comments are accepted is no less than 45 calendar days. Comments must be submitted within this time frame.
3. The lead analyst works with appropriate agencies and proponents to develop an analysis on the proposal.
4. The analysis is sent to the Councils, ADF&G and the ISC for comments and recommendations to the Board. The public is welcome and encouraged to provide comments directly to the Councils and the Board at their meetings. The final analysis contains all of the comments and recommendations received by interested/affected parties. This packet of information is then presented to the Board for action.
5. The decision to adopt, adopt with modification, defer or reject the proposal is then made by the Board. The public is provided the opportunity to provide comment directly to the Board prior to the Board's final decision.
6. The final rule is published in the Federal Register and a public regulations booklet is created and distributed statewide and on the Program's website.

**A step-by-step guide to submitting your proposal on [www.regulations.gov](http://www.regulations.gov):**

1. Connect to [www.regulations.gov](http://www.regulations.gov) – there is no password or username required.
2. In the white space provided in the large blue box, type in the document number listed in the news release or available on the program webpage, (for example: FWS-R7-SM2014-0062) and select the light blue “Search” button to the right.

3. Search results will populate and may have more than one result. Make sure the Proposed Rule you select is by the U.S. Fish and Wildlife Service (FWS) and **not** by the U.S. Forest Service (FS).
4. Select the proposed rule and in the upper right select the blue box that says, “Comment Now!”
5. Enter your comments in the “Comment” box.
6. Upload your files by selecting “Choose files” (this is optional).
7. Enter your first and last name in the spaces provided.
8. Select the appropriate checkbox stating whether or not you are providing the information directly or submitting on behalf of a third party.
9. Fill out the contact information in the drop down section as requested.
10. Select, “Continue.” You will be given an opportunity to review your submission.
11. If everything appears correct, click the box at the bottom that states, “I read and understand the statement above,” and select the box, “Submit Comment.” A receipt will be provided to you. Keep this as proof of submission.
12. If everything does not appear as you would like it to, select, “Edit” to make any necessary changes and then go through the previous step again to “Submit Comment.”

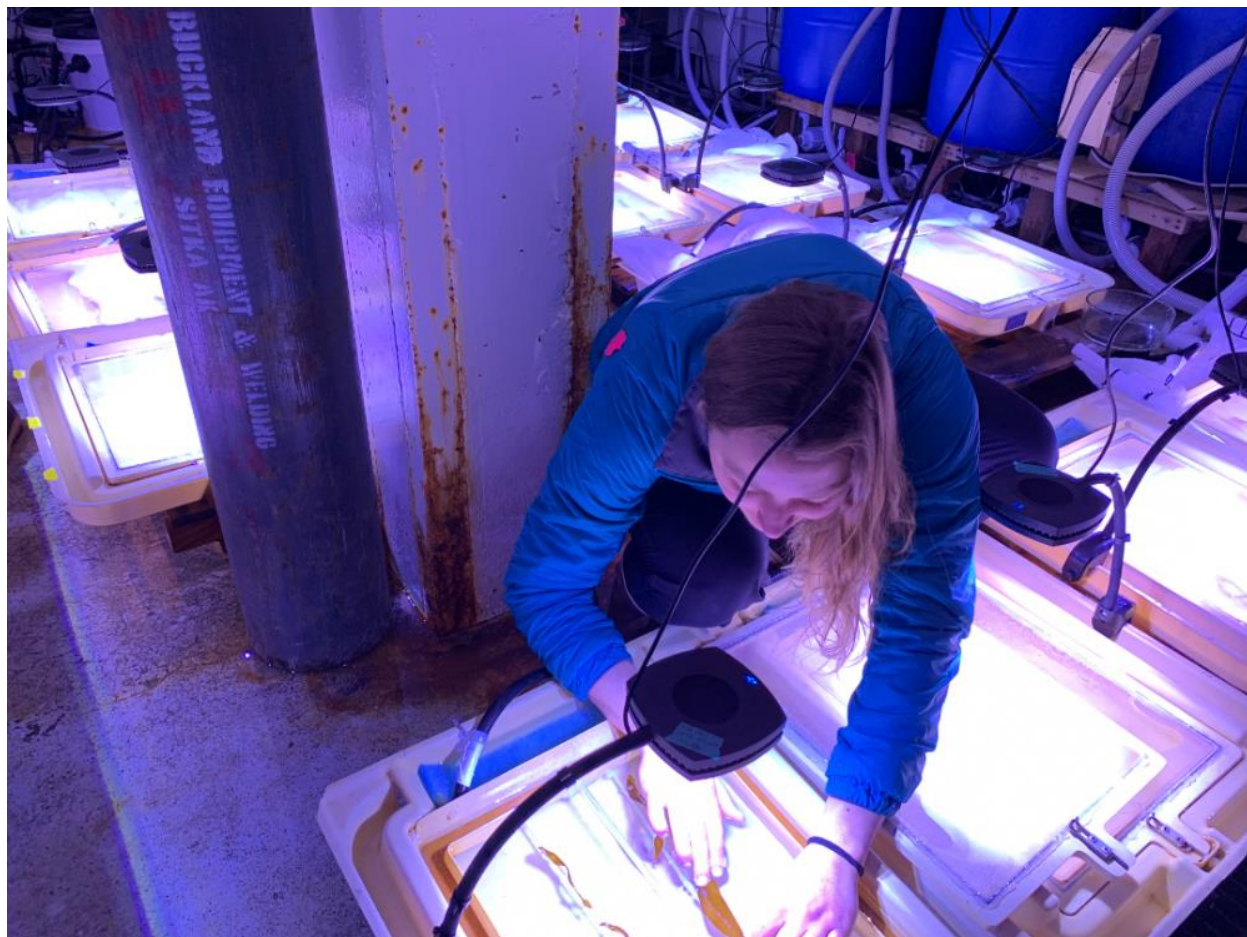
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**Missing out on the latest Federal subsistence issues?** If you’d like to receive emails and notifications on the Federal Subsistence Management Program you may subscribe for regular updates by emailing [fws-fsb-subsistence-request@lists.fws.gov](mailto:fws-fsb-subsistence-request@lists.fws.gov). Additional information on the Federal Subsistence Management Program may be found on the web at [www.doi.gov/subsistence/index.cfm](http://www.doi.gov/subsistence/index.cfm) or by visiting [www.facebook.com/subsistencealaska](http://www.facebook.com/subsistencealaska).

## In kelp forests, scientists seek climate change refuge for herring roe

Published 8 April 2019



*Lauren Bell points to herring eggs growing on silicone baking sheets, which mimic the texture of kelp but don't photosynthesize. Bell is a researcher from UC Santa Cruz working closely with UAS professor Angie Bowers to study the impact of climate change on herring roe. (Photo by Katherine Rose/KCAW)*

Aerial surveys of Sitka Sound showed a lot of active herring spawn this week, stretching over 31 nautical miles to date. But that wasn't the only place to find roe.

In the basement of the Sitka Sound Science Center, researchers are incubating thousands of herring eggs to determine the effects of warming ocean temperatures and ocean acidification on the species — now and in the future.

Descend into the basement of the Sitka Sound Science Center, and you'll find a scene akin to something in a horror movie or an episode of "Goosebumps:" An eerie blue light and a loud humming noise emanating from behind a green tarp curtain.

But Lauren Bell, a researcher working on her Ph.D. through the University of California, Santa Cruz, is reassuring.

“Behind this glowing green tarp is a pretty cool experiment that we’ve just started,” said Bell. “We’re trying to simulate future conditions of Sitka Sound and rear herring roe from fertilization to hatch to see how they do.”

Bell pushes the tarp aside and squeezes into the makeshift room. On the floor are rows of small white tubs, glowing bright from UV light.

“What you’re looking at is a single layer of herring roe, herring eggs lined up along these blades of kelp,” she said. “They are basically held in these conditions, and we’re going to hold them here until they hatch, and see if their health is affected in any way. If their hatch rate, their fertilization success, their length, their size is affected at all by these changing ocean conditions.”

Each incubator holds about 300 herring roe — about 7,000 in the 24 trays — so Bell and her research partner, University of Alaska Southeast assistant professor Angie Bowers, didn’t need to collect more than a handful of herring to conduct the research. Just one fish lays around 20,000 eggs.

Researchers know that the ocean is warming, absorbing excess carbon dioxide in the environment and becoming more acidic through a process called ocean acidification. Bell is trying to replicate those warmer conditions in Sitka Sound, 100 years from now.

“What that means is a projected increase in water temperature by about 4 degrees Celsius,” Bell said. “And an increase in the CO<sub>2</sub>, the carbon dioxide content of the water. So more ocean acidification, the pH is actually going to be lower.”

Researchers also hypothesize that kelp forests and seagrass beds can help offset that acidification process by absorbing CO<sub>2</sub> through photosynthesis, creating refuge zones by raising the pH, making the environment less acidic. Now Bell and Bowers are trying to figure out just how much kelp could help species like pacific herring in warming conditions.

“Algae might respond in some way to climate change. Fish might respond in another way. Does the habitat these herring roe grow up in actually afford them some protection from future conditions?” Bell asked.

Bell is comparing fertilized roe on kelp and roe on clear silicone baking sheets, which are similar in texture to the kelp but don’t photosynthesize. They look at the eggs under a microscope every day to see what changes they can observe, but one thing is certain.

“At our higher-temperature treatments, they’re going to mature quicker,” she said. “In our low-temperature treatments which are simulating today, they’ll probably take another 15-to-16 days to hatch.”

She said that in many ways, this project is unique.

“Quite a few (studies) have looked at temperature effects, but not very many that have looked at the temperature and carbon dioxide, ocean acidification effects combined.”

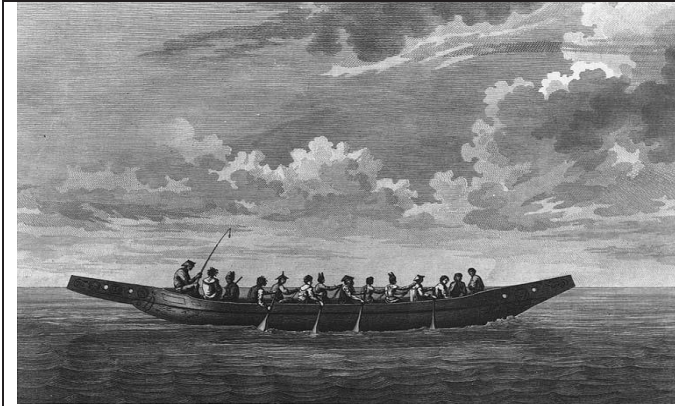
And, Bell said, though they’re looking into the impact of temperatures 100 years from now, there could be some implications for the fishery today.

“The temperature data, knowing our waters are warming up, is going to change timing for everything, for spawn timing, for development,” she said.

“Really, we don’t yet know what ocean acidification is going to do to these guys at any stage of their life,” she said. “If we can start to get a picture of if they’re more vulnerable than we think, or less vulnerable than we think, that will hopefully influence what protections we want to give them, how we manage them.”

Right now, she’s just a few days into the project, so it’s too early to tell if the kelp effectively protects the roe from the high temperatures and low pH. She’ll need about three weeks for all of the eggs to hatch — around the same time their relatives in Sitka Sound will be hatching in the wild.

Katherine Rose, *KCAW-Sitka* via *KTOO Public Media*, 5 April 2019.  
[https://www.ktoo.org/2019/04/05/in-kelp-forests-scientists-seek-climate-change-refuge-for-herring-roe/](https://www.ktoo.org/2019/04/05/in-kelp-forests-scientists-seek-climate-change-refuge-for-herring-ro/)



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Acting Chairman  
c/o Office of Subsistence Management  
1011 E. Tudor Rd., MS 121  
Anchorage, AK 99503-6199**

RAC/SE 20001.DP

Anthony Christianson, Chair  
Federal Subsistence Board  
c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Southeast Alaska Subsistence Regional Advisory Council (Council) submits this FY2019 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its fall 2019 public meeting in Ketchikan, the Council identified concerns and recommendations for this report, and approved it at its winter 2020 public meeting in Juneau. The Council wishes to share information and raise a number of concerns aligned with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Southeast Alaska Region.

From its various discussions, the Council has identified the following issues to bring to your attention with this annual report:

**1. Youth Engagement**

The Council would like to bring this 2018 Annual Report item back to the Board's attention. The Council feels fortunate to have received public testimony from young people at its recent meetings. Currently, there is a group of high school students in Sitka that take part in a Procedures and Practicum Class which introduces the Federal Subsistence Program (Program) to students. This class teaches students to navigate and participate in the public decision-making process effectively. This class has brought students to this Council's meetings and to the Board meetings for the last five years.

The contributions of young people are valued by the Council and this type of interaction furnishes the next generation with the tools and experience necessary to be actively involved in the Program. The students practice public testimony, develop analytical skills, thoughts and questions, as well as improve their networking. Opportunities such as this class's interaction with the Program provide youth with a realistic and tangible way of making an impact in preserving the subsistence lifestyle. Below are just a few comments that the Council heard recently from youth that provide a variety of reasons for the Council to seek avenues and funding to encourage young people to be involved:

“My hope is that all of the amazing benefits of subsistence that I have enjoyed as a youth will still be there after me. We must cherish the source of Alaska's wealth, taking care of it for our future generations.” (Tava Guillory)

“It feels like we're too young to be able to create new laws and policies, but what we're not too young to do is just project our voices and make sure that the people who are making these rules understand that this is something that we care about and our futures are something that we want to be protected.” (Darby Osbourne)

“So far this experience, for me, has been pretty amazing. I've learned far more than I thought I ever could in a day. It's also incredibly rewarding to learn so much from people who care so much about these issues. Seeing this process and witnessing people standing up and trying to change things is so inspiring . . .” (Cora Dow)

At this past meeting, the U.S. Forest Service and the Alaska Conservation Foundation assisted with funding; however, the Council would like the Board to explore options for the Program to provide consistent funding to this group to ensure its continued existence. The group's adjunct professor informed the Council of the numerous challenges for obtaining funding and it seems funding is an issue each and every year.

In addition to the Sitka students, a student who attends the tribal scholars school in Ketchikan, run by the Ketchikan Indian Community, was also able to participate in the last meeting. In addition to providing public testimony on a wildlife proposal, climate change and the proposed Roadless Rule, she shared her personal experience with a persistent bear problem in the area involving bears unable to digest the plastics ingested from unsecured garbage. “As a youth subsistence user, this is my future, bears eating plastic. Deer not doing well. The salmon not doing well. This is going to be the majority of my life . . . I'm going to have to deal with this for a long time because I'm only 15 . . .” (Shania Murphy)

The Council expressed its appreciation and voiced their support and encouragement to students that spoke at the last meeting:

“Listening to you guys, you young ladies speak, made me feel good because you're doing something that elders aren't doing, or older people, adults aren't doing, we're here because of taking care of this world, subsistence.”

“Your thoughts are very well put together, very directed and I encourage you to keep your eyes open and be there for when we’re not in these seats anymore and you’ll do well. We really appreciate your interest and your dedication and you inspire us . . .”

The Council hopes that the Program can provide some financial assistance to ensure that these opportunities for youth to be engaged in the Federal Subsistence Program continue. Future generations have an interest in protecting subsistence resources and should have the opportunity to participate in the Program.

The Council would like a commitment from the Program to make funds available for interested students to participate in these types of worthwhile educational experiences. Providing youth with an opportunity to speak and share their perspectives on current issues is important for considering solutions to problems. This is an investment in developing the leaders of tomorrow and to equip the upcoming generation with the tools and knowledge to protect and secure the subsistence way of life for future generations.

## **2. Funding for Wildlife Research Management Projects**

The Council is unsure whether funding currently exists for wildlife research management projects. The Council would like to receive a status of this program and an update on current funding options.

## **3. Staff Representation**

In its Annual Reports, since 2017, this Council has shared its concern regarding the lack of consistent technical staff support present at its Council meetings. Although the Board previously assured the Council that “while there have been reductions in Federal travel budgets, the Council can expect continuing biological support at its meetings,” the Council is still distressed by the decline in the physical presence of Federal staff at its meetings.

The Council has provided examples of the challenges created by having less technical staff present at the meetings. During regulatory meetings, the Council feels it is vital to have the staff person who performed the analysis for the proposal present in the room to relay that information and to answer questions. Presentations and responses lose value when relayed over the telephone line. This makes it very difficult for the Council and the public to hear the information and thoroughly engage in the proposal process.

In-person support staff are crucial for the Council to conduct its business efficiently and with the right resources. Council members will often speak with analysts at the meeting and use these conversations to formulate questions to ask on the record regarding specific issues. Analysts participating by phone have limited time and opportunity to discuss subject matter. Limitations placed on the interactions between Council members and subject matter experts does not fulfill the intent of ANILCA.



The Council asks that this request be fully reconsidered in light of the provisions set forth in ANILCA Section 805(b). Council members would like to receive greater level of assistance from in-person staff to provide the technical support needed to conduct the Council's business.

#### **4. Correspondence Policy**

The Council was extremely disappointed in the amount of time that it took for its correspondences to go through the review and finalization process at the Office of Subsistence Management (OSM) this past year. The Council requests that the Board review the current Correspondence Policy and revise it to include identifiable levels of accountability and to ensure timely processing.

The Council recognized that the number of OSM administrative staff was limited for the last several months; however, it appeared that the majority of the time spent on moving the correspondence forward was because of the numerous OSM staff required to review the correspondence. The Council submitted eight letters. One of those eight letters was processed timely. The remaining letters took months to complete. In fact, one letter submitted for processing, which was a simple cover letter to transmit another correspondence, took FOUR months to finalize. This is unacceptable. The Council cannot conduct its business and carry out its responsibilities with such a low level of support from the Program.

The Council would like to see the Board direct OSM to streamline the correspondence process so that all correspondence is processed within one week. The Council would also like to see parameters regarding oversight be established so that an exorbitant amount of time is not spent re-writing letters unnecessarily. Councils and their coordinators should be given latitude to draft correspondence in a manner reflecting the Council's style and dialect, relaying information in plain language. Correspondence from the Council rarely needs to read like a perfect technical guide and the amount of time spent by OSM personnel to make numerous changes to text has resulted in unconscionable delays. Edits should be limited to spelling, grammar, and legal content only. No substantive changes should be made except to provide consistent messaging from the Program.

The Council would like to see the OSM review process of correspondence more formally outlined. This should include the steps of the process, the personnel involved, and the justifications for each step/personnel oversight. The Council would encourage the Board to then scrutinize the amount of oversight from OSM personnel and request an explanation of why most of this Council's letters took months to complete. The postponement of timely processing of correspondence resulted in a significant delay of the letter to the Secretary of Agriculture, conveying important information that the Council hoped he would have prior to making his decision on the Alaska Roadless Rulemaking Draft Environmental Impact Statement (AKKR DEIS) preferred alternative.

Lastly, the Council would like to see a revised Program Correspondence Policy, incorporating strategic and realistic steps and accountability, within the coming year.

## **5. ANILCA Section 810 Hearings**

The Council would like to inform the Board that it has submitted substantial comments on the Alaska Roadless Rulemaking issue. The Council has been discussing this issue for several months and it would like to formally inform the Board that it actively advocated for ANILCA Section 810 hearings during the AKKR DEIS period. The Council believed that the proposed rulemaking was a land management plan and, as such, required Section 810 hearings and an analysis related to the outcome of those hearings. This Council has a long history of weighing in on land management plans on the Tongass National Forest and it looks forward to seeing the Section 810 analysis on this matter.

## **6. Board's Response on 2019 Annual Report Item: Subsistence Shrimp**

The Council informed the Board, in its last Annual Report, of the testimony received on the State of Alaska's recent restrictions regarding conservation concerns of the shrimp stock in District 13C. This Board's response encouraged the Council to write a letter directly to the Board of Fisheries to express the concerns that the Council received. The Council wishes to express its appreciation to the Board for providing good constructive guidance and for giving the Council an avenue of recourse. The Council decided to write a letter directly to the Board of Fisheries conveying the information on this subject that had previously been disclosed to this Board.

## **7. Extra-Territorial Jurisdiction**

The Council heard testimony regarding the lack of herring harvests in Sitka Sound for many years. In its last Annual Report, this Council advised the Board that it may see a request for Extra-Territorial Jurisdiction (ETJ) regarding this matter in the future and that the Council would like the Board to process any such petition by following its policy on ETJ matters. The Council received information on the Program's ETJ procedure, along with an example of an ETJ petition, to provide to those interested in pursuing an ETJ in the Sitka Sound herring matter. The Council would like to thank the Board and Program for these guidelines and information. The Council hopes that the Board and Program will continue to provide assistance throughout this process, as appropriate, should an ETJ petition be received regarding the State's failures to manage this resource and the detrimental impact that it is having on this culturally important subsistence resource.

Thank you for the opportunity for this Council to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and the uses of these resources on Federal Public lands and waters. We look forward to continuing discussions about the issues and concerns of subsistence users in the Southeast Alaska Region. If you have questions about this report, please contact me via DeAnna Perry, Subsistence Council Coordinator, U.S. Forest Service, at [dlperry@fs.fed.us](mailto:dlperry@fs.fed.us) or 1-800-478-1456 or 907-586-7918.

I thank you, in advance, for the courtesy of your consideration.

Sincerely,

Donald Hernandez  
Chair

cc: Federal Subsistence Board  
Southeast Subsistence Regional Advisory Council members  
Tom Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
Greg Risdahl, Acting Deputy Assistant Regional Director,  
Office of Subsistence Management  
Suzanne Worker, Acting Subsistence Policy Coordinator,  
Office of Subsistence Management  
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management  
George Pappas, State Liaison, Office of Subsistence Management  
Tom Kron, Acting Coordination Division Chief, Office of Subsistence Management  
Tom Whitford, U.S. Forest Service  
DeAnna Perry, Subsistence Council Coordinator, U.S. Forest Service  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish & Game  
Mark Burch, Wildlife Biologist, Alaska Department of Fish & Game  
Interagency Staff Committee  
Administrative Record

Yakutat Tlingit Tribe's Yakutat Foreland Baseline Studies proposal

## Project Abstract

**Project Title:** Yakutat Foreland Baseline Studies

**Applicant Name:** Yakutat Tlingit Tribe (YTT)

**Applicant Address:** P.O. Box 418, Yakutat, AK 99689

**Phone number:** (907) 784-3238 x107

**Email address:** [jhanlon@ytttribe.org](mailto:jhanlon@ytttribe.org)

**Fax number:** (907) 784-3595

**Website:** <https://yakutattingittribe.org/>

### Project Summary:

This project is to collect baseline water quality data on 12 culturally important rivers and will serve the 99 percent of Yakutat households that harvest customary & traditional foods.

Yakutat is an isolated Tlingit Indian village in Southeast Alaska that is only accessible by boat and plane. The Yakutat Foreland, south of the community, is an interconnected watershed habitat that supports an abundance of culturally important fish and wildlife. The Yakutat Foreland is largely under management by the U.S. Forest Service. The area is open to potential mineral development which could impact water quality, salmon, and other subsistence foods. The Yakutat Foreland was subject to a proposed open-pit mine in 2008 when more than 76 square miles were registered as mineral claims. These claims were forfeited in 2010. There is potential for exploration in the near future.

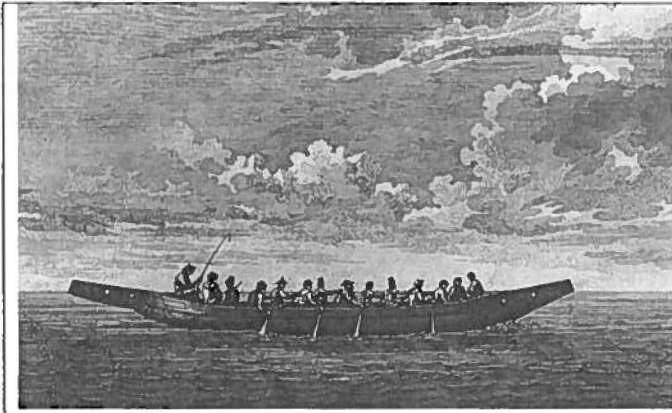
Tribal members participated in a survey that identified 12 waterbodies within the Yakutat Foreland to be included for baseline data collection. There is limited historic water quality data for 4 of these rivers, or 30 percent of the waterbodies, but none of this data is comprehensive enough to inform regulatory decisions on any proposed mineral development.

The long-term community goal is framed in YTT's Mission Statement: "*To preserve, maintain and protect the unique culture, land & resources of the Yakutat Tlingit people; to maximize our social health & well-being while creating economic development benefits to all tribal members.*" The project goal is to enhance the Yakutat Tlingit Tribe's efforts to protect traditional hunting and fishing resources in the Yakutat Foreland by collecting a scientifically defensible baseline water quality dataset.

The Yakutat Foreland Baseline Studies project will provide for:

- staff time
- transportation to remote sample sites
- water sampling supplies
- laboratory analysis for water samples analyzed for dissolved metals and hydrocarbons commonly associated with mining activity

The outcome will be three years of water data that establish the baseline conditions and set the precedent for future regulatory compliance monitoring. This data will be leveraged to strengthen water quality stewardship within the Yakutat Tlingit's traditional territories.



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Chairman  
c/o Office of Subsistence Management  
1011 E. Tudor Rd., MS 121  
Anchorage, AK 99503-6199**

**APR 15 2019**

RAC/SE 19015.DP

**Re: Support for the Yakutat Tlingit Tribe's ANA Environmental Regulatory  
Enhancement grant application for baseline water quality studies**

To Whom It May Concern:

Please accept this letter of support for the Yakutat Tlingit Tribe (YTT)'s Yakutat Foreland Baseline Studies proposal to collect baseline water quality data.

The Yakutat Foreland is a 400,000 acre mosaic of wetlands, shrub lands, and forests, that provide some of the most pristine and productive salmon habitat in the State. Abundant rainfall, mild temperatures, high water table, and a gravel substrate make the Foreland especially productive spawning and rearing habitat for anadromous fish. The Alaska Department of Fish and Game has identified over 90 anadromous fish streams in the area. The dense network of streams provide spawning and rearing habitat for all five species of Pacific salmon, Dolly Varden, Char, Cutthroat Trout, and Steelhead Trout. This fish habitat supports a varied community of bear, moose, and thousands of migratory birds, as well as the economy and the practice of cultural activities of the community of Yakutat.

The Southeast Subsistence Regional Advisory Council (Council) was formed under Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. The Council's charter establishes its authority to initiate, review, and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska Region (ANILCA §805). The Council represents the Federally qualified subsistence user and reviews resource management actions that may impact subsistence resources critical to those users.

The council understands that healthy and intact habitat is key to maintaining available subsistence resources. This information relates to subsistence management because it assesses the overall health of subsistence habitat.

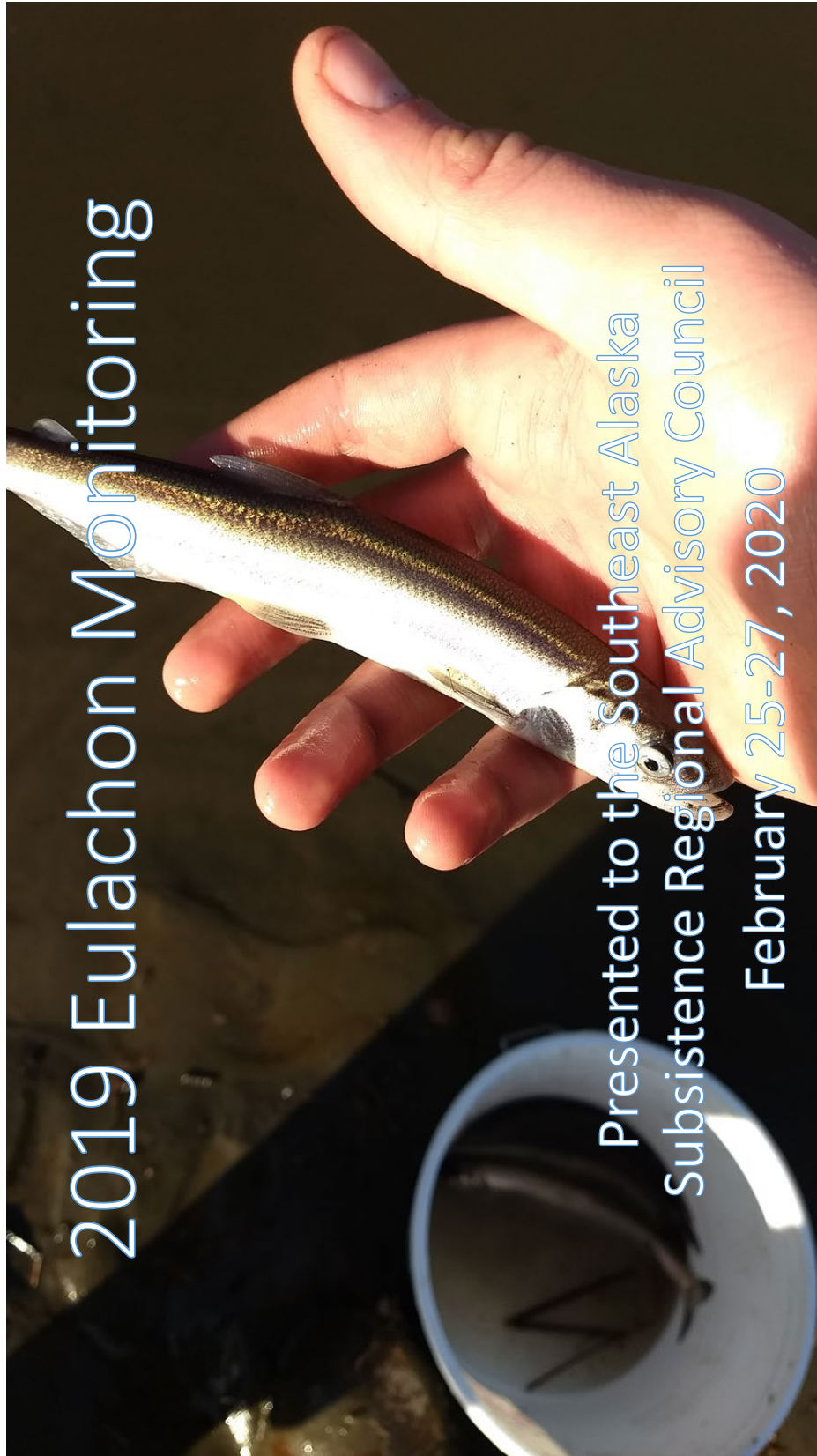
The Council would like to convey its support of YTT's proposal to collect baseline water quality data and looks forward to learning from YTT as their program develops and progresses. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-586-7918, [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov).

Sincerely,



Donald Hernandez  
Chair

cc: Federal Subsistence Board  
Southeast Alaska Subsistence Regional Advisory Council Members  
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
Jennifer Hardin, Ph.D., Acting Deputy Regional Director,  
Office of Subsistence Management  
Gregory Risdahl, Fisheries Division Supervisor, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Robbin La Vine, Acting Anthropology Division Supervisor,  
Office of Subsistence Management  
Katerina Wessels, Acting Council Coordination Division Chief,  
Office of Subsistence Management  
Thomas Whitford, Regional Subsistence Program Leader, U.S. Forest Service  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



# 2019 Eulachon Monitoring

Presented to the Southeast Alaska  
Subsistence Regional Advisory Council

February 25-27, 2020

# Weight/fish-- Unuk River

- 1590 fish sampled from 2001-2003
- Averaged at 38 g/fish --Far smaller than Copper and 20 Mile River fish
- Average weight --12 fish/lb., as 3 year olds dominated the return

USFS unpublished data, 2001-2003

Van Alen, B. W. Unpublished. Unuk River Eulachon Stock Assessment, 2001 to 2010. U.S. Fish and Wildlife Service, Office of Subsistence Management, Fisheries Resource Monitoring Program, Final Report Study No. 08-607. Anchorage, Alaska.



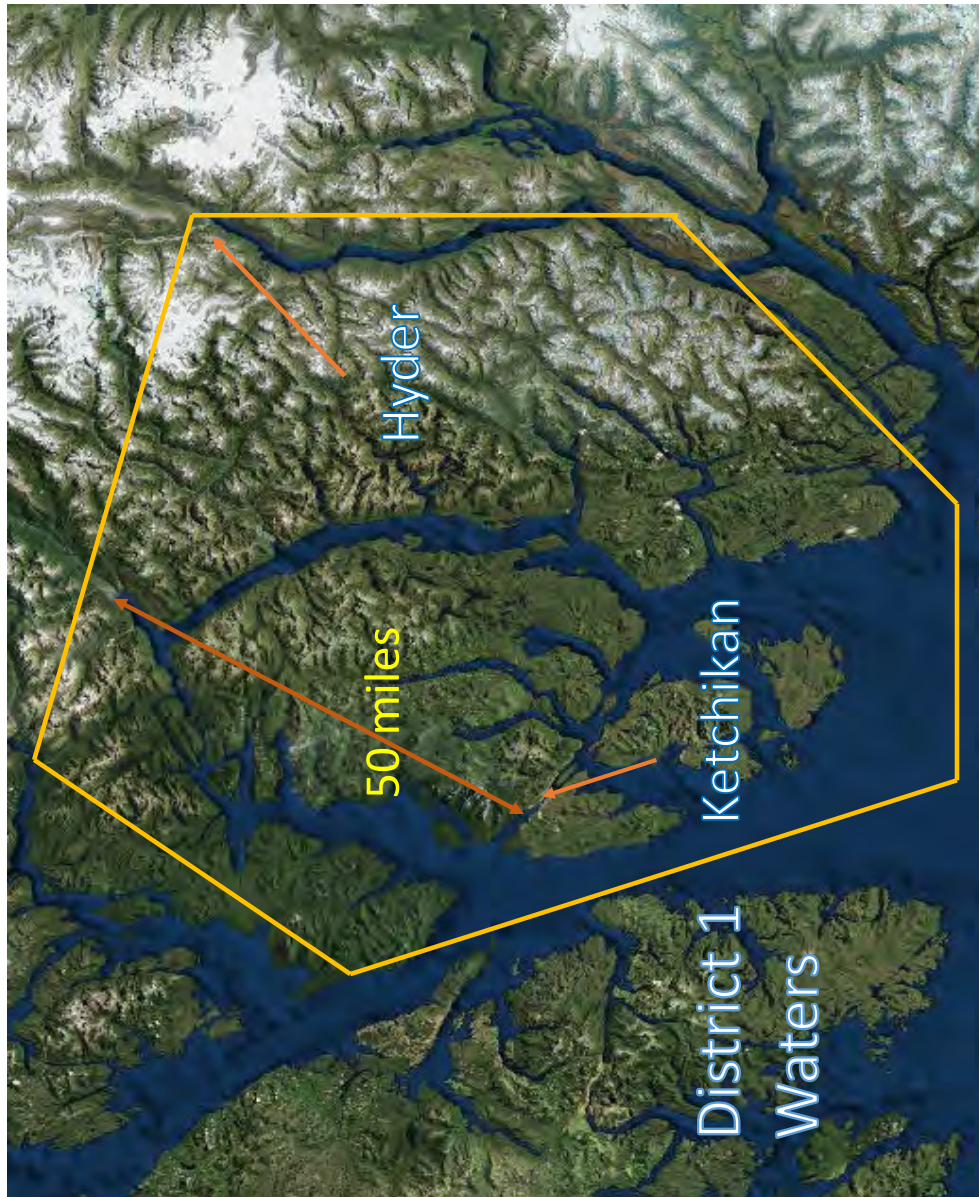


Dense school – “Black”



# Shallow water school – Can appear denser from the air

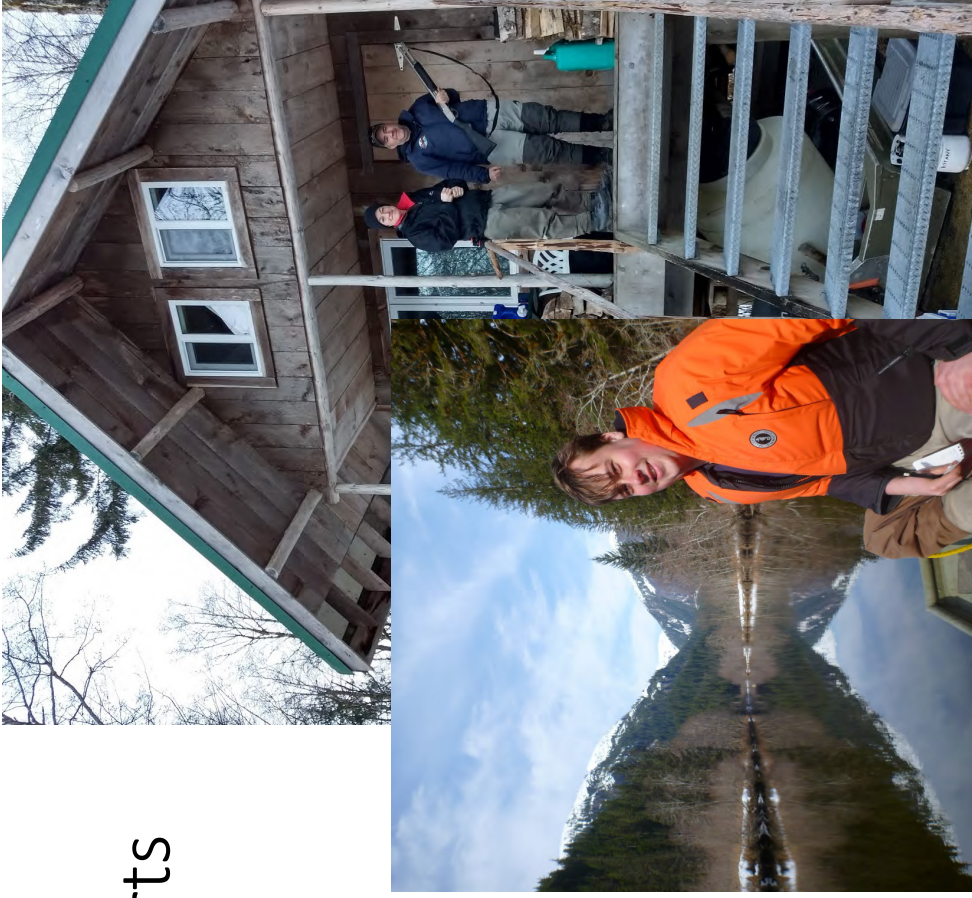






## 2019 Monitoring Efforts

- Two weeks on the ground monitoring.
- Three aerial surveys (March 12, March 21 and April 5).
- **Aubrey Saunders**/Jon Hyde/Emily Judson/Josh Lynn/Art Williams (USFS-KMRD)
- **Sam Naujokas**/Tony Gallegos/Trixie Bennett (Ketchikan Indian Community)
- Steve & Laura Huffine (Local cabin owner)







Tidal flat (low tide)

Approximately 2 miles



**Tide flat (high tide)**





**Lower Main River**

Lower Landing Slough (high and low tide)







**Eulachon River**



**March 12, 2019**



High tide boat surveys





Bucket = 5 gallons

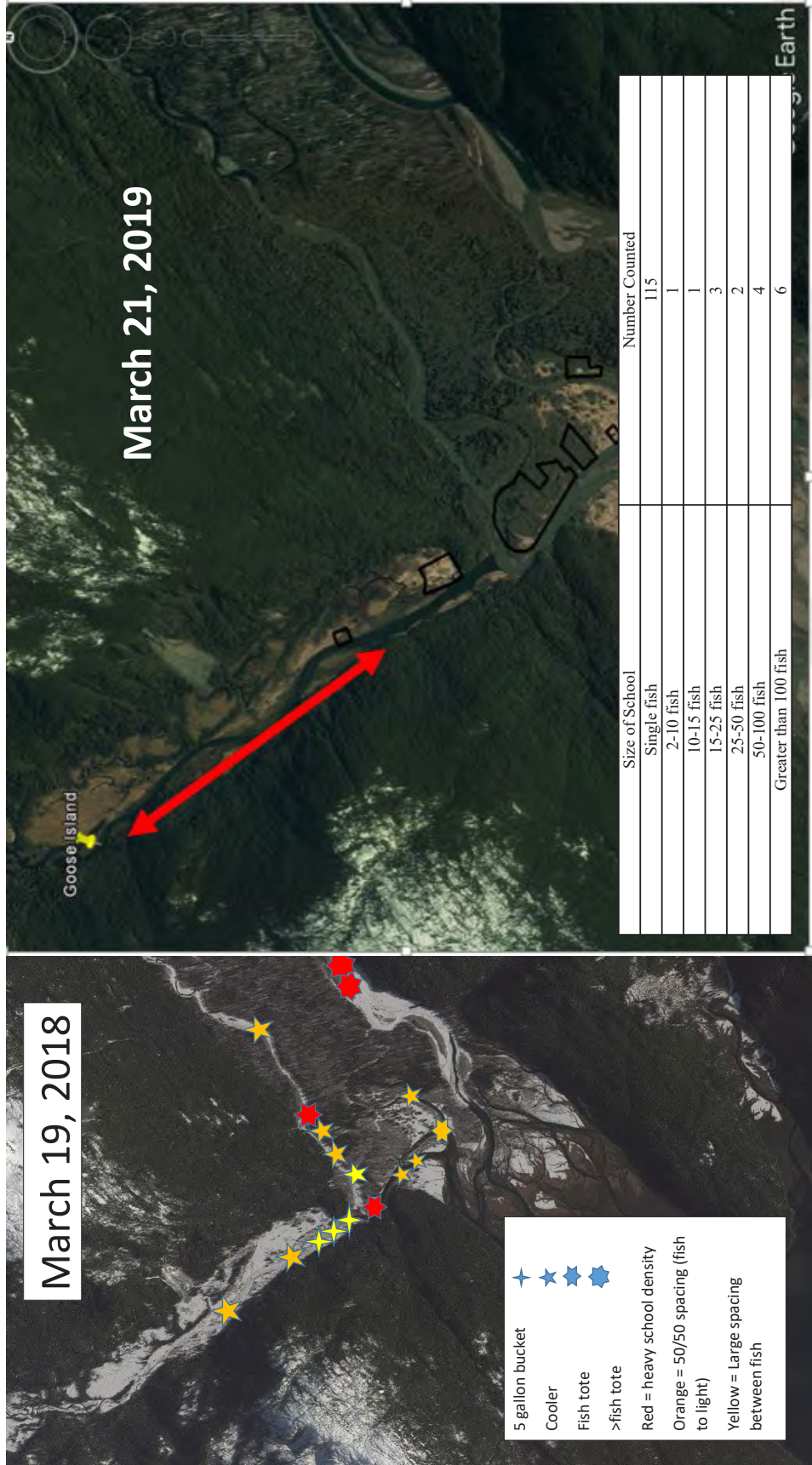


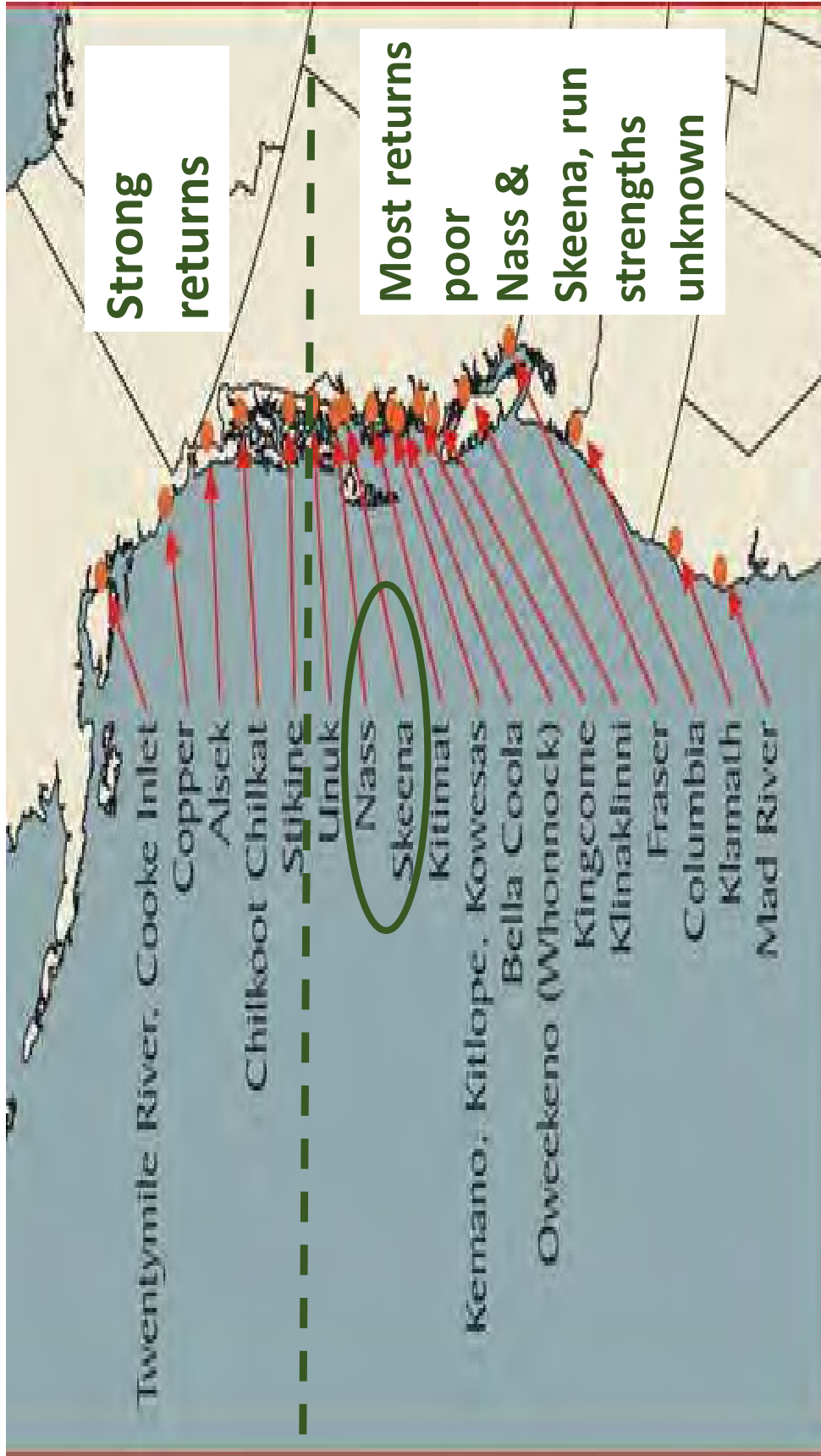
Cooler = 30 gallons



Fish tote (44" x 44" x 28") = 200 gallons







## Other 2019 Eulachon Returns

- Columbia River – The Columbia River Eulachon run started around Christmas. Final outcome was consistent with forecast of a poor return.
- Kemano River -- Eulachon arrived on March 23. <https://www.northernsentinel.com/entertainment/the-hunt-for-the-eulachon/>
- Bella Coola –
- Skeena River – first indications Eulachon harvest was seen online in late February.
- Nass River –



## Other 2019 Eulachon Returns

- Stikine River – Good return from mid-March until end of April.
- Chilkoot River – Return deemed strong this year -- <https://khns.org/strong-hooligan-return-on-the-chilkoot-this-year>
- Situk/Aisek/Doame Rivers – Decent showings noted during aerial surveys in late March. Picture to right is from the Aisek (Nate Catterson photo)

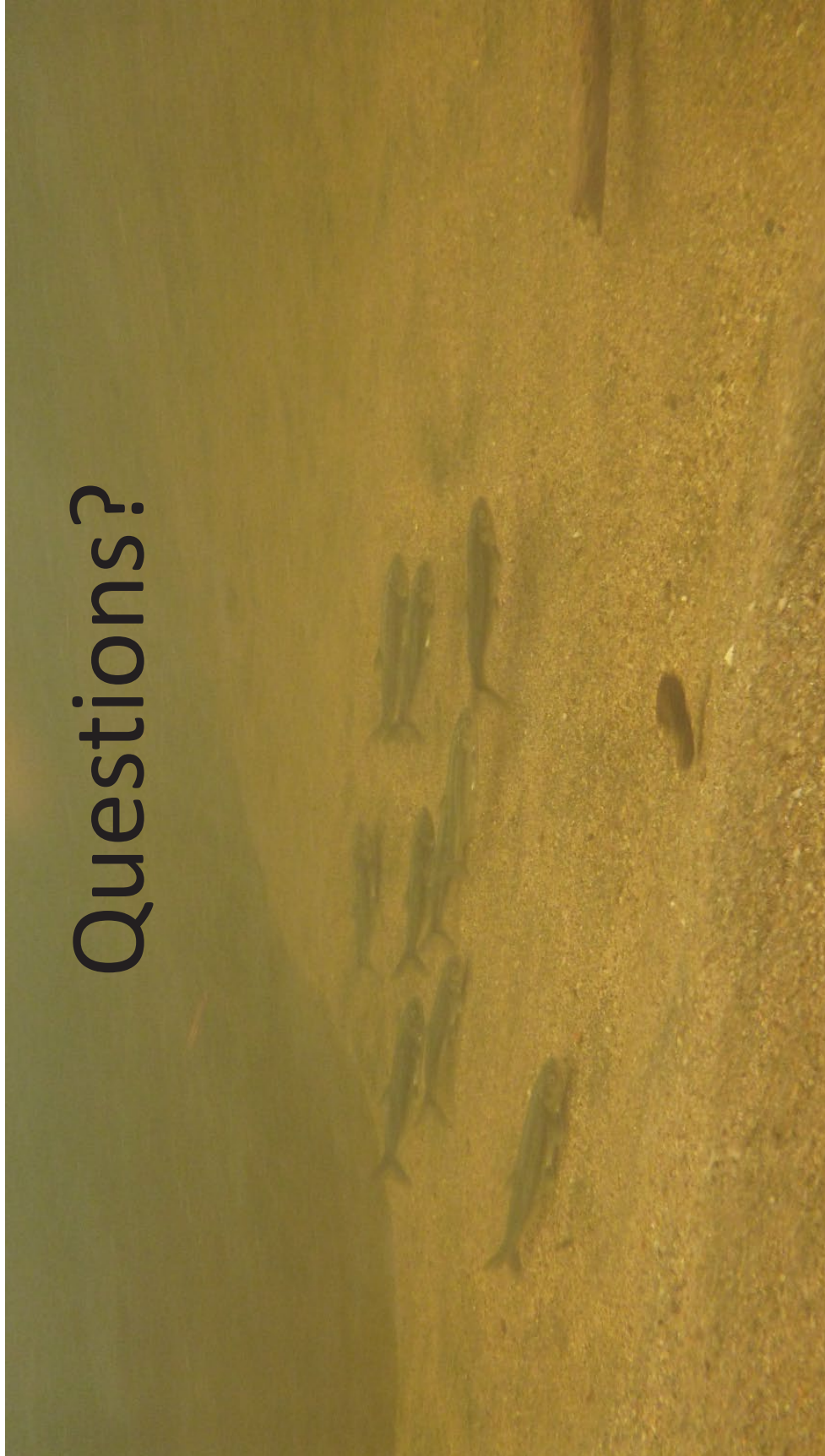




## 2020 monitoring hopes...where do we go from here?

- Continued on the ground monitoring with KIC.
- Continued aerial surveys of all Ketchikan area Eulachon systems Hyder/Portland Canal areas if possible.
- Include participation of Meredith Pochardt to determine if eDNA is workable on the Unuk drainage to include in future efforts.





Questions?

# **Prince of Wales Landscape Level Analysis**

## **Out-year Plan, November 2019**

A wide array of proposed activities has been included in the latest Out-year Plan for the project. The Out-year Plan is a living document that allows the public to track activities through the implementation process.

See table attached for proposed activity details, as of Dec 27, 2019.

From: <https://www.fs.usda.gov/detail/tongass/landmanagement/projects/?cid=fseprd529245>



Fiscal Year 2019 Vegetation Management Activities	Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
1. Commercial Timber Harvest – Twin Mountain	On-hold	Island LSTA, Proposed Units Area Map, Unit cards, Combined 11 by 17 Maps	Streams, plants, heritage, soils, roads, timber, wildlife, watershed, scenery, karst	April to September 2019	No	Surveys -Yes	N. Reynolds	Forest Supervisor
2. Precommercial thinning (timber, wildlife and riparian)	Postponed	SNZ and NZ proposed pct maps,	Pre-treatment surveys and layout	May/June 2019	No	No	J. Sangunitto	District Ranger and Deputy District Ranger
Watershed Improvement and Restoration	Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
1. Invasive Plant Treatments (Manual/Mechanical)	Implementation complete	Invasive Plant 2019 Completed Treatments	Completed	N/A	Yes, annually	Yes	District Botanist	District Ranger and Deputy District Ranger
2. Shaheen MS1 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
3. Shaheen MS3 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany, heritage	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
4. Shaheen MS4 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
5. Shaheen SF1 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
6. Shaheen SF2 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany, heritage	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
7. Shaheen SF3 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany, heritage	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
8. Shaheen SF4 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
9. Shaheen NF1 Restoration	Surveys Postponed to 2020	Shaheen Design Maps	Soils, botany	June 15, 2019	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
10. Shaheen EF1 Restoration	Site was Dropped	Shaheen Design Maps	N/A	N/A	N/A	No	K. Krantz	District Ranger and Deputy District Ranger
11. Nahania Creek Restoration	Scheduled for 2020	North POW Design Maps	Soils, botany, heritage	June 15, 2019	None at this time	Yes- A Stewardship Agreement between	K. Krantz	District Ranger and Deputy District Ranger



Fiscal Year 2020 Vegetation Management Activities	Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
1. Precommercial thinning (timber, wildlife and riparian)	Draft	SNZ and NZ proposed pct maps,	Pre-treatment surveys and layout		No	No	J. Sangunitto	District Ranger and Deputy District Ranger
2. Cedar Interplanting	Draft		Silviculture surveys			No	J. Sangunitto	District Ranger and Deputy District Ranger
3. Stoney Cone Helicopter Timber Sale	Draft	Stoney Cone Helicopter Timber Sale Draft Unit Cards, Stoney Cone Helicopter Timber Sale Unit Map – North, Stoney Cone Helicopter Timber Sale Unit Map – South, Uneven-aged Management Prescription	All resources	August 15, 2020	No	Yes – field surveys	Nick Reynolds	Forest Supervisor, District Ranger or Deputy District Ranger
Watershed Improvement and Restoration	Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
9. Invasive Plant Treatments (Manual/Mechanical)	Draft	Planned 2020 Manual/Mechanical Treatments of Invasive Plants	Completed	Early summer 2020	Yes, annually	No	District Botanist	District Ranger and Deputy District Ranger
10. Invasive Plant Treatments (Herbicide)	Draft	Public Workshop Poster- 2020 Proposed 12 Mile Japanese Knotweed Treatment	Soils, streams, botany, heritage	Early summer 2020	Potentially, depending on efficacy of herbicide treatment which will be gaged through pre-determined monitoring efforts	No	District Botanist	District Ranger and Deputy District Ranger
11. Mahania Creek Restoration	Prepping Contract and Permit Requests	North POW Design Maps, Stream Restoration Design Typical	Completed	Completed	Potentially, if post-restoration monitoring deems further treatment is needed. For example, if recommendations, such as more seeding, are made after a BMP monitoring visit.	Yes, FY19 Retained Receipts and Partnership funding	K. Krantz	District Ranger and Deputy District Ranger
12. Shaheen MS1 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
13. Shaheen MS3 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
14. Shaheen MS4 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger

Fiscal Year 2020												
15. Shaheen SF1 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger				
16. Shaheen SF2 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger				
17. Shaheen SF3 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger				
18. Shaheen SF4 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger				
19. Shaheen NF1 Restoration	Surveys scheduled	Shaheen Design Maps, Stream Restoration Design Typical	Botany/invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger				
20. Red Pipe Replacement on RD 3012000 MP 0.283	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Agreement documents	Completed	N/A	N/A	Yes	A. Cummings	District Ranger and Deputy District Ranger				
21. Red Pipe Replacement on RD 3012000 MP 0.586	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Agreement documents	Completed	N/A	N/A	Yes	A. Cummings	District Ranger and Deputy District Ranger				
22. Red Pipe Replacement on RD 2000440 MP 0.13	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Agreement documents	Completed	N/A	N/A	Yes	A. Cummings	District Ranger and Deputy District Ranger				
23. Red Pipe Replacement on RD 2050400 MP 3.79	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Agreement documents	Completed	N/A	N/A	Yes	A. Cummings	District Ranger and Deputy District Ranger				

Fiscal Year 2020	To be implemented during fish-timing window in summer 2020	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	A. Cummings	District Ranger and Deputy District Ranger
24. Red Pipe Replacement on RD 2050300 MP 2.93	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Agreement documents	Completed	N/A	N/A	Yes	A. Cummings	District Ranger and Deputy District Ranger
25. Red Pipe Replacement on RD 3000000 MP 84.181	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Contract documents	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
26. Red Pipe Replacement on RD 2050070 MP 0.150	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Contract documents	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
27. Red Pipe Replacement on RD 2051000 MP 5.49	To be implemented during fish-timing window in summer 2020	AOP Spreadsheet, Fish Barrier Culverts Map, Contract documents	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
Sustainable Recreation Management	Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
1. Basic Maintenance of Cabins/Trails	Draft	N/A	N/A	N/A	Yes	No	Judd Manuel	District Ranger and Deputy District Ranger
2. Deweyville Trail	Proposed for implementation	Recreation Public Workshop Poster	Soils	Spring 2020	No	No	Denise Wolvin	District Ranger and Deputy District Ranger
3. 12 mile Cabin Admin road and Vault toilet	Draft	Recreation Public Workshop Poster	Soils	Spring 2020	Yes, Annual Maintenance	Yes	Judd Manuel	District Ranger and Deputy District Ranger
4. Canoe Point	Draft	Recreation Public Workshop Poster	N/A	N/A	No	No	Denise Wolvin	District Ranger and Deputy District Ranger
5. El Capitan Campground/boat launch	Surveys scheduled	Recreation Public Workshop Poster	Soils, botany, heritage	Late spring/ early summer 2020	Yes, annual maintenance	No	Denise Wolvin	District Ranger and Deputy District Ranger
6. El Capitan Campground	Surveys scheduled	Recreation Public Workshop Poster	Soils, botany, heritage	Late spring/ early summer 2020	Yes, annual maintenance	No	Denise Wolvin	District Ranger and Deputy District Ranger

Fiscal Year 2021		Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
Vegetation Management Activities									
1.	Precommercial thinning (timber, wildlife and riparian)	Draft		Pre-treatment surveys and layout		No	No	J. Sangunitto	District Ranger and Deputy District Ranger
Watershed Improvement and Restoration		Current Status	Associated Documents	List Field Surveys Required	Timeframe For Surveys to be Completed	Follow-up Treatments Required:	Funded	Activity Leader	Line Officer
1.	Red Pipe Replacement on RD 2050000 MP 10.36	On-going	AOP Spreadsheet, Fish Barrier Culverts Map	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
2.	Red Pipe Replacement on Rd 2050000 MP 19.51	On-going	AOP Spreadsheet, Fish Barrier Culverts Map	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
3.	Red Pipe Replacement on RD 3036000 MP 0.27	On-going	AOP Spreadsheet, Fish Barrier Culverts Map	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
4.	Red Pipe Replacement on RD 2050300 MP 4.67	On-going	AOP Spreadsheet, Fish Barrier Culverts Map	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
5.	Red Pipe Replacement on RD 2050400 MP 4.49	On-going	AOP Spreadsheet, Fish Barrier Culverts Map	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
6.	Red Pipe Replacement on RD 2050000 MP 22.23	On-going	AOP Spreadsheet, Fish Barrier Culverts Map	Completed	N/A	N/A	No	A. Cummings	District Ranger and Deputy District Ranger
7.	Flicker Creek Restoration	Surveys scheduled	North POW Design Maps, Stream Restoration Design Typical	Botany/Invasives, Engineering, Heritage, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
8.	Buster Creek Restoration	Surveys scheduled	North POW Design Maps, Stream Restoration Design Typical	Botany/Invasives, Engineering, Heritage, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
9.	Shaheen MS1 Restoration	Potential Implementation	Shaheen Design Maps, Stream Restoration Design Typical	Botany/Invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
10.	Shaheen MS3 Restoration	Potential Implementation	Shaheen Design Maps, Stream Restoration Design Typical	Botany/Invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger
11.	Shaheen MS4 Restoration	Potential Implementation	Shaheen Design Maps, Stream Restoration Design Typical	Botany/Invasives, Engineering, Karst, Silviculture, Soils, Wildlife	Sept. 30, 2020	None at this time	No	K. Krantz	District Ranger and Deputy District Ranger



Central Tongass Project – Preliminary List of Activities for Proposal and Review in 2020

## Preliminary List of Activities for Proposal and Review in 2020

*Preliminary list of activities within the Central Tongass project area being considered for proposal and review in 2020<sup>1</sup> (after the Central Tongass Record of Decision is signed).\**

Location	Timeframe	Project Description
Etolin Island, Anita Bay	2021	<b>Anita Bay LTF</b> Reconstruct the existing bulkhead to replace a rotting log substructure and expand the lower level to increase the width working within the existing footprint.
Mitkof Island	2020	<b>Raven's Roost Cabin</b> Build public recreation cabin in new location; decommission old cabin.
Mitkof Island	2020	<b>Dispersed Recreation Sites</b> Improve parking areas and log transfer facilities on Mitkof Island at locations that are known public use areas on NFS lands (for example, Snake Ridge, Woodpecker undeveloped campsite and LTF, South Blind Slough LTF, end of Dry Straits road). No infrastructure would be provided at these sites (e.g., fire rings, picnic tables, trash cans).
Mitkof Island	2020	<b>Old-growth Timber Harvest</b> Old-growth timber harvest, new NFS road building, reconstruction and temporary road construction.
Mitkof Island	2020-2021	<b>South Blind Slough LTF Reconstruction and Improvements</b> Remove and replace rotting log bulkhead, improve ramp and add rock lift to existing footprint to better implement BMPs. Expand upland sorting capacity an estimated 2 acres working with the existing easement.
Mitkof Island	2020-2021	<b>Woodpecker LTF Improvements</b> Expand upland sorting and operability capacity by an estimated 2.5 acres within the existing easement.
Thomas Bay	2020	<b>Young-growth Timber Harvest</b> Young-growth timber harvest, and temporary road construction.
Zaremba Island	2020-2021	<b>Bridge and AOP culvert reconstruction</b> Reconstruct 80 foot bridge on NFS road 6590 at MP 1.177 (St John's Creek) to retain stream course and address scour issues; reconstruct a bridge on Outback Creek to address scour issues and stream constrictions; replace existing culverts with AOP structures on NFS road 6590 at MP 42.44 and NFS road 6590 at MP 5.36 to provide aquatic fish passage (survey and designs complete); install AOP structure on NFS road 6585 at MP 10.174 (surveyed complete and needs design).

\*These activities have NOT been NEPA-cleared. The Central Tongass IDT will use the Implementation Framework and Implementation Checklist outlined in the Central Tongass, Appendix A - Implementation Plan and Activity Guides to introduce projects and review proposed activity locations.





Central Tongass Project – Projects to Possibly Integrate with Central Tongass Activities

## NEPA-Cleared Projects to Possibly Integrate with Central Tongass Activities

Summary of NEPA-cleared projects that may benefit by integrating with Central Tongass activities. These projects are also listed in the Central Tongass DEIS, Appendix C - Catalog of Events.

Location	Timeframe	Project Description
Wrangell Ranger District	2020-2022	<b>Invasive Plant Treatments</b> Using a mix of herbicide, hand pulling and tarps treat up to 3 gross acres of orange hawkweed treatments, 100 gross acres of reed canarygrass treatments, 0.1 acre knotweed and 1 acre combined yellow hawkweed, oxeye daisy and foxglove. Specific to wilderness: Up to 0.1 acre orange hawkweed, 63 acres reed canarygrass, 1 acre orange hawkweed, 0.1 acre yellow hawkweed, and 10 gross acres cut stump/spot spray treatments of European mountain ash.
Petersburg Ranger District	2020-2022	<b>Invasive Plant Treatments</b> Using a mix of herbicide, hand pulling and tarps treat up to 6 gross acres of orange hawkweed treatments, 1 acre of yellow hawkweed and oxeye daisy combined, 10 acres reed canarygrass, 1 acre knotweed, 0.1 acre bull thistle and 0.1 acre Canada thistle. Specific to wilderness: Up to 1 acre reed canarygrass, 0.1 acre dandelion.
Etolin Island	2022	<b>Navy Timber Sale (Decision 2015)</b> As of April 2019, 864 acres (3.1 MMBF) old-growth harvest remaining (helicopter harvest only).
Etolin Island	2020	<b>Timber Stand Improvement (Decision 2016)</b> Pre-commercially thin approximately 1,011 acres of young growth on Etolin Island.
Kupreanof Island, Kake Road System	Ongoing	<b>Central Kupreanof Timber Harvest (Decision 2011)</b> Decision authorizes timber harvest on 1,329 acres (26.3 MMBF). As of May 2019, approximately 62 MBF has been harvested.
Kupreanof Island, Tonka Road System	2020	<b>Pre-commercial Thinning (Decision 2017)</b> Pre-commercial thinning on the Tonka road system - approximately 356 acres of 30-year old young-growth stands.
Mitkof Island	2021	<b>East Ohmer Creek Restoration (Decision 2016)</b> Proposed instream and floodplain restoration on approximately 0.2 mile of East Ohmer Creek and 0.4 mile of Lumpy Creek, one of its tributaries. Construct wood structures for pool creation and cover. Floodplain restoration may include addition of soil and logs/trees for structure. Perform maintenance on currently excavated rearing ponds.
Mitkof Island	2021	<b>Man Made Hole Stream Channel Maintenance (Decision 2016)</b> This project proposes to re-excavate a channel and add wood and/or rock structures to encourage water flow to a channel that connects a tributary of Blind River to the pond at Man Made Hole. Currently, the flow into the pond has been reduced due to natural deposition of sand and gravel in the channel.

Central Tongass Project –Projects to Possibly Integrate with Central Tongass Activities

Location	Timeframe	Project Description
Mitkof Island	2021	<b>Ohmer Creek Floating Bridge</b> Proposal to reconstruct the Ohmer Creek floating bridge. The bridge connects two sections of the Ohmer Creek Trail that is separated by an active beaver pond. Design type and length to be determined in FY2020. CE and DM are expected in FY2021.
Mitkof Island	2020	<b>Mitkof Island Deer Habitat Enhancement (Decision 2015)</b> The objective is to treat up to 1,114 acres of young-growth stands on Mitkof Island to benefit deer. A variety of silvicultural treatments are being considered.
Mitkof Island	2020	<b>Pre-commercial Thinning (Decision 2017)</b> Pre-commercial thinning on the Mitkof Road system - approximately 651 acres of young-growth stands that are 19-41 years old.
Mitkof Island	2021	<b>Ideal Cove Trail</b> Re-route and reconstruct Ideal Cove trail (0.8 miles). CE and DM are expected in FY2019.
Shrubby Island	2022	<b>Timber Stand Improvement (Decision 2013, 2016)</b> Pre-commercially thin and prune approximately 438 acres of young growth on Shrubby Island for timber production and wildlife and fish habitat enhancement.
Thomas Bay	2021	<b>Thomas Bay Moose Habitat Enhancement (Decision 2013)</b> Selectively thin conifers in riparian areas on roughly 100 acres** in the Patterson River floodplain at Thomas Bay. The areas will be treated to encourage the growth of willow and cottonwood, forage species preferred by moose. **Approximately 50 acres of treatment are remaining.
Wrangell Island	2024	<b>Timber Stand Improvement (Decision 2016)</b> Pre-commercial thinning and pruning approximately 863 acres of young growth on Wrangell Island for timber production, wildlife and fish habitat and scenery enhancement.
Wrangell Island	2022	<b>Wrangell Island Project (Decision 2017)</b> 428 acres (5-7 MMBF) of old-growth harvest 2.3 miles NFS road construction 1-4 mile of NFS road reconstruction 2.6 miles of temporary road
Zaremba Island	2020	<b>BITSU8 Creek Stream Restoration Using Hand Tools</b> The NEPA for this project was completed in the Stream Restoration Using Hand Tools EA and DN/FONSI (2017). The proposed restoration reach is approximately 0.3 miles on Zaremba Island and in a previously-harvested floodplain/riparian area. The existing condition meets the criteria for restoration described in the EA. Implementation would use hand tools including picks, shovels, chainsaws, winches, etc. No heavy equipment proposed.

Central Tongass Project –Projects to Possibly Integrate with Central Tongass Activities

Location	Timeframe	Project Description
Zarembo Island	2021-2022	<b>Timber Stand Improvement (Decision 2016)</b> Pre-commercially thin (PCT) and prune approximately 1,460 acres of young growth on Zarembo Island for timber production and wildlife and fish habitat enhancement.



# Changing Water Dynamics

The consequences of shifting snow, ice, and running water for ecosystems, people, and national forests in Alaska



Forest Service Washington Office December 2017



Office of Sustainability and Climate



Northwest Climate Hub U.S. DEPARTMENT OF AGRICULTURE



## Changing Water Dynamics

The consequences of shifting snow, ice, and running water for ecosystems, people, and national forests in Alaska

### State-wide Patterns

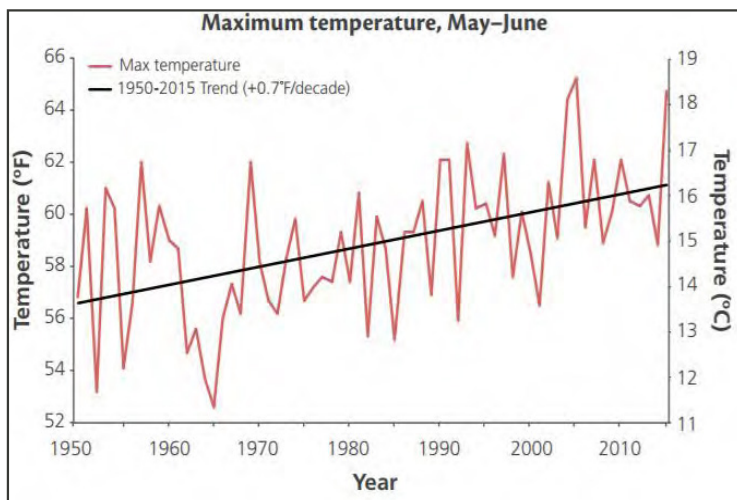
Ecosystems of Alaska are rain-, snow-, and ice-driven systems. Consequently, the status of water—liquid or solid—strongly influences resources and the people using ecosystem services. This document examines changes in water dynamics, the resulting consequences for ecosystems and people, and management options for adapting to changing conditions.

Changes in snow, ice, and water ripple through ecosystems, social systems, and culture. State-wide patterns provide context to understand changing water dynamics in southcentral and southeastern Alaska associated with lands managed by the National Forest System.

Alaska covers a portion of the globe as vast as the entire 48 contiguous states. The state spans 19 degrees of latitude, has over 33,900 miles of coastline (NOAA n.d.), and includes terrain reaching 20,310 feet in elevation. The arrangement of coastal and interior landscapes, broad range of elevations, and the storm-generating Pacific Ocean result in extreme geographic and interannual variation in climate, and ultimately in the dynamics of water (Shulski and Wendler 2007).

This variation adds uncertainty for resource planning and business activities. For instance, snowfall in Anchorage ranged from 25 inches in 2015 to 134 inches in 2012, and January temperatures in Kotzebue ranged from near average in 2013 to 17 degrees Fahrenheit above the 30-year average in 2014 (Galloway et al. 2014).

Figure 1 - May–June maximum temperature in central Alaska. In recent decades, there has been a trend of increasing temperatures and melting ice. [Click on the graph](#) for more information on ecological drought in Alaska.



Mid-winter travel across Alaska

Courtesy of Greg Hayward

### Alaska Climate Extremes

#### Temperature extremes

- Prospect Creek: -80 degrees Fahrenheit
- Ft. Yukon: 100 degrees Fahrenheit

#### Average high temperature in July

- Barrow: 47 degrees Fahrenheit
- Fairbanks: 73 degrees Fahrenheit

#### Average low temperature in Jan./Feb.

- Umiat: -31 degrees Fahrenheit
- Ketchikan: 29 degrees Fahrenheit

#### Average annual precipitation

- Barrow: 4 inches
- Yakutat: 160 inches



### Drivers for Changing Water Dynamics: Recent Climate Patterns in Alaska

- » Over the past 60 years, Alaska warmed more than twice as rapidly as the rest of the United States. State-wide average annual air temperature increased by 3 degrees Fahrenheit and average winter temperature by 6 degrees Fahrenheit (Chapin et al. 2014, Stewart et al. 2013). See Figure 1 above.
- » Length of the growing season in interior Alaska has increased 45 percent over the last century. The extended growing season and associated higher temperatures reduce the period of snow and ice, increase wildfire risk, and facilitate northward expansion of some insect species that affect trees (Chapin et al. 2014, Hollingsworth et al. 2017).

### Historical Climate Patterns: Examples from Two Key Features

A historical perspective highlights the scope of change experienced in Alaska and provides context for current changes in water dynamics.

1. While evidence suggests that the area of arctic sea ice varied dramatically over a 1,300-year period prior to the 1900s, the pronounced decline in sea ice cover that began around 1990 is unprecedented compared to earlier changes (Kinnard et al. 2011, Halfar et al. 2013).
2. Retreat of glaciers since their maximum extent has led to strong directional (rather than cyclic) changes in stream geomorphology, hydrology, and ecology. (Gough and Wilson 2001, Hayward et al. 2017). At the last glacial maximum—approximately 20,000 years ago—most of southcentral and southeast Alaska was under ice. The current topography and vegetation represents the outcome of climate warming and resulting glacial retreat followed by species re-colonization over the last 14,000 years (Ager 2007).

### Potential Future Climate Patterns Across Alaska

- » Average annual temperatures in Alaska are projected to rise by an additional 2-4 degrees Fahrenheit by 2050. This level of warming is a consequence of current atmospheric composition and likely to occur regardless of social decisions. Depending on global emissions, temperatures are expected to rise 8-12 degrees Fahrenheit by the end of the century (Stewart et al. 2013, Chapin et al. 2014).
- » Alaska's far northern latitude and patterns of storm tracks create the potential for increases in precipitation and storms. Annual precipitation increases of about 15-30 percent are projected for the state by late this century (Stewart et al. 2013). However, increases in evaporation caused by higher air temperatures and longer growing seasons are expected to reduce water availability in some areas.



Figure 2 - The [Snows of Alaska](#) story map has information and interactive maps about glacial retreat, snowpack vulnerability, and snow-water equivalent.

### Environmental Changes and Economic, Social, and Cultural Consequences

Changes in temperature and precipitation throughout Alaska are altering water dynamics, leading to fundamental changes in the physical state of water, with downstream consequences for ecosystems and people.



### Sea ice decline

- The spatial extent of late summer sea ice is half that in 1980, increasing coastal erosion, altering marine species composition, and changing access for Arctic shipping (Stroeve et al. 2012, Kinnard et al. 2011, Halfar et al. 2013).
- Alaska Native and other subsistence hunters have seen thinning sea and river ice that makes harvest of wild foods more dangerous. They have also detected a northward shift in seal and fish species (Chapin et al. 2014). Changes in Arctic shipping routes could threaten traditional harvest of whales, walrus, and seals, thus altering cultural conditions for northern communities (Wang and Overland 2012).

### Permafrost thaw

- Eighty percent of Alaska is underlain by permafrost, 70 percent of which is vulnerable to subsidence upon thawing (Jorgenson et al. 2008). This thawing will release the greenhouse gas methane, resulting in a feedback loop and further thawing.
- Over the next 20 years, subsidence in response to permafrost thaw will add between \$3.6 and \$6.1 billion (10 to 20 percent) to the costs of maintaining public infrastructure such as buildings, pipelines, and roads (Larsen et al. 2008). Damage to potable water and sanitation systems along with deterioration of [family ice cellars](#) threaten rural communities by forcing families to leave villages and move to culturally unfamiliar cities (Brubaker et al. 2011).

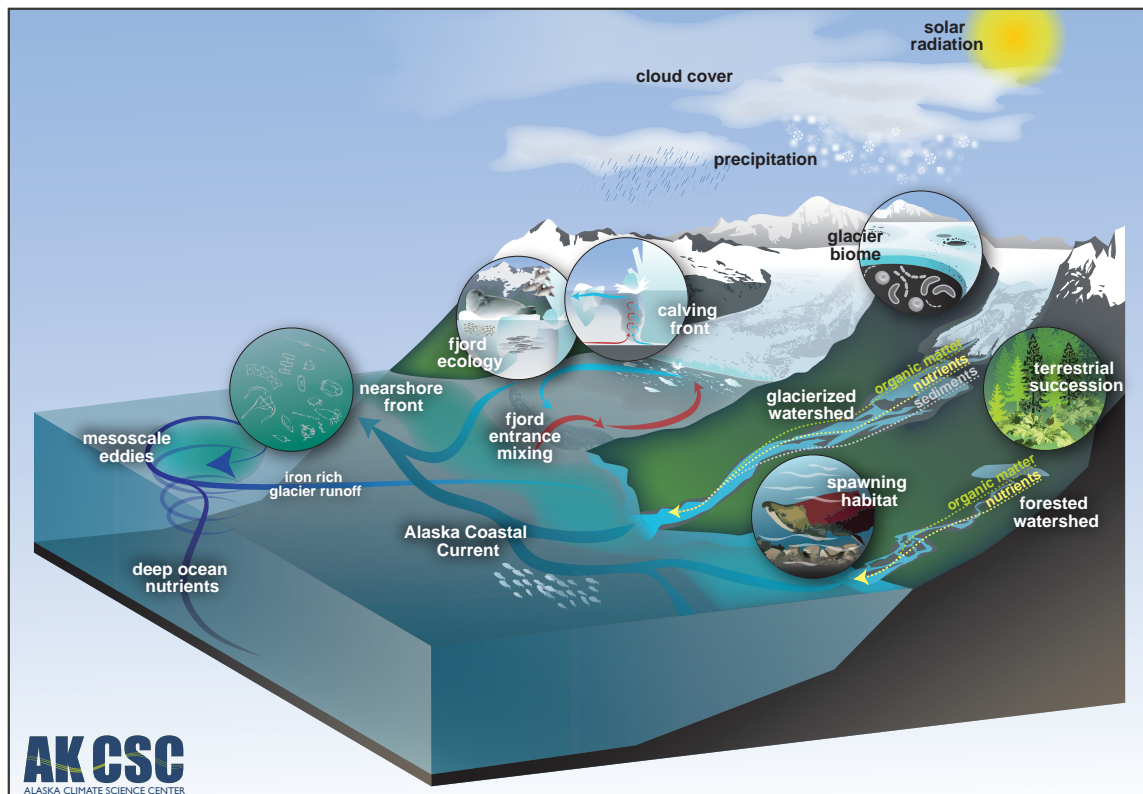


Figure 3 - [Click on the graphic](#) to see how glaciers impact Alaska's coastal ecosystems, and what glacier changes mean for ecological and economic systems. (Courtesy of Kristin Timm, Alaska Climate Science Center.)







Watch the [Adapting to Climate Change in Alaska](#) video to see how some communities are adapting and maintaining their lifestyles in the face of climate change.

Read more about the loss of permafrost in the New York Times article [Alaska's Permafrost is Thawing](#) (Fountain 2017).

### Vegetation change

- Changes in water dynamics may result in increases in area burned by wildfire. Some scenarios suggest that by mid-century there will be a doubling in area burned (Balshi et al. 2008). In boreal forests, increases in fuel moisture from increases in rainfall are more than offset by higher temperature and associated evapotranspiration from fine fuels (Flannigan et al. 2016). Tundra that rarely burned in the past 5,000 years now burns regularly (Hu et al. 2010, Chapin et al. 2014).
- The distribution of shrubs and trees is expanding into tundra biomes in northern Alaska in response to changing water availability and growing season, resulting in changes in the distribution of wildlife such as moose and ptarmigan (Tape et al. 2006, Hollingsworth et al. 2010, Tape et al. 2016).



Courtesy of Pat Hayward

## Changing Water Dynamics in Southcentral and Southeast Alaska: Chugach and Tongass National Forests

The Alaska Region is unparalleled among national forests in size and the extent of untamed lands. It is a land of ancient ice and thousands of miles of rugged shoreline. The Alaska Region contains 17 percent of all National Forest System lands and the northern-most portion of temperate coastal rainforest on the planet.

The 16.8 million acre Tongass National Forest in southeast Alaska stretches the 500-mile length of the Alaska Panhandle. The communities of Juneau, Sitka, Wrangell, Ketchikan, Petersburg, and more than 25 other villages are closely tied to this vast temperate rainforest.

The Chugach National Forest, encompassing nearly 5 million acres in southcentral Alaska, makes a 210-mile arc around Prince William Sound, contributing to the culture and economies of Anchorage, Seward, Cordova, Valdez, Chenega Bay, Whittier, and other communities.

Culture, recreation, and ecosystems of southcentral and southeast Alaska all reflect the coastal North Pacific setting. Cool summers, winters with sea level temperatures near freezing, and high levels of precipitation throughout the year result in substantial (and highly variable) rainfall. Glaciers and icefields comprise 10 million acres of the region (EcoAdapt 2014, USDA 2014). These glaciers and snowfall patterns are predisposed to rapid transformation in a warming climate.

### Glacier Retreat: Coastal Glacier Dynamics

Decreased glacier volume and extent is a widely recognized symbol of changing water dynamics in southcentral and southeast Alaska. Glaciers cover about 5 percent of Alaska and are losing an estimated 16 cubic miles of ice per year—equivalent to more than a year of discharge on the Copper River. Glaciers in southeast Alaska



contribute 43 percent of the runoff flowing into the Gulf of Alaska, a volume comparable to that flowing in the Mississippi River basin (Neal et al. 2010, Hill et al. 2015).

Glaciers in Chugach National Forest are thinning at their termini by about 10 feet per year, largely as a result of warming summer temperatures (Neal et al. 2010, Hill et al. 2015, Larsen et al. 2015, Littell et al. 2017).



Muir Glacier in southeast Alaska, 1880 and 2005.

Glacial retreat results from several factors. For example, Columbia Glacier, an extensive tidewater glacier in Chugach National Forest, lost 37 cubic miles of ice in the past 30 years, but less than 10 percent of this loss has been caused by recent climate patterns. For instance, the shape of the glacial fjord can interact with long-term dynamics of glacier movement, particularly delivery of ice from high in the icefield, resulting in rapid changes in tidewater glaciers unrelated to current climate patterns (O’Neel 2012, Post et al. 2011, Rasmussen et al. 2011).

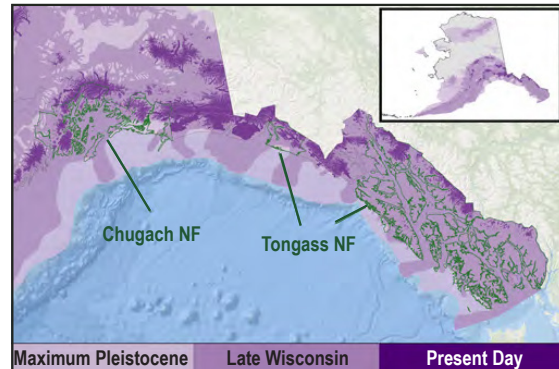


Figure 4 - Comparison of glacier extent at three points in time: the maximum Pleistocene limit (over the past 3 million years), the late Wisconsin glaciation (about 20,000 years ago), and the current extent. [Click on the graphic](#) for more information.

Columbia Glacier, which is responsible for half of the Chugach glacial ice loss, has declined by 50 percent in the past 35 years (O’Neel et al. 2013). Retreat is expected for the next 20 years resulting in over 9 miles of further retreat (Pfeffer 2015). Visit the [Snows of Alaska story map](#) to see a time-lapse video of Columbia Glacier’s retreat over time.

Calving dynamics result in a range of tidewater glacier behaviors (Larsen et al. 2015). Since 1950, Harvard Glacier on the Chugach National Forest has advanced more than 1,600 feet while 10 other tidewater glaciers on the forest retreated 1,600 feet or more. The remaining tidewater glaciers have relatively static termini (McNabb and Hock 2014, Littell et al. 2017). Several tidewater glaciers moved up onto bedrock reducing their direct ecological function in the marine environment.

Rapid loss of glacial cover in a fjord or on a mountainside alters the viewscape. However, changes in ecological function and ecosystem services may be even more significant than the visual change and will influence natural resources in several ways as described below.



**Habitat for marine mammals, seabirds, and fish**

- » Icebergs from tidewater glaciers provide important structures for seal habitat, as well as attractive scenery.
- » The delivery of nutrient-rich water at the base of tidewater glaciers, deep in the marine water column, circulates nutrients and stimulates productivity that ultimately increases food for fish, seabirds, and marine mammals (Hood and Scott 2008, Renner et al. 2012, Bartholomaus et al. 2013). Twenty glaciers in southeast Alaska have direct contact with marine waters (Ecoadapt 2014) and a similar number exist in southcentral Alaska (McNabb and Hock 2014).



Blackstone Glacier with its toe in Prince William Sound

**Ocean circulation contributions to marine productivity and salmon fisheries**

Glacial meltwater and associated streamflow from watersheds in Tongass and Chugach national forests drives the Alaska Coastal Current which moves nutrients and organisms northwest along the Alaska coast through the Aleutian Islands into the Arctic (O’Neel et al. 2015). Changes in freshwater discharge influence the strength of the current and productivity well beyond Alaska coastal waters.

**Stream hydrology and geomorphology**

Annual patterns of discharge in watersheds differ substantially depending on the presence

of glaciers (Hood and Berner 2009, Littell 2017, O’Neel 2015). Watersheds with glaciers release high volumes of silt-laden water in mid and late summer after the peak flow from snowmelt. Glaciated watersheds therefore exhibit geomorphology and habitat features that differ from clear-water systems, resulting in differing biota. As glaciers recede, altered glacier melt will affect geomorphology and hydrology, changing freshwater productivity (EcoAdapt 2014, Chilcote et al. 2017).

**Consequences of Glacier Decline for Ecosystem Services, Economic Systems, and Culture**

- » Glacial outburst [floods](#) (also known as [jökulhlaups](#)) occur periodically in some glacial systems sending large volumes of silt-laden water downstream. As glaciers recede, outwash floods may occur in systems where they were absent in the past. These floods, along with higher than historical summer flows, endanger infrastructure such as roads, bridges, buildings, and travelways for subsistence along traditionally used waterways.
- » Stream systems in Tongass and Chugach national forests support subsistence, recreation, and commercial fisheries. About 15 percent of the world’s Pacific salmon originate from the Chugach National Forest. Commercial salmon harvest from the Tongass National Forest represents 25 percent of the entire west coast catch (Chilcote et al. 2017, Tongass salmon factsheet 2017).
- » Over the past decade, the at-dock value of commercial salmon harvested from the Alaska Region averaged \$105 million annually. The combined economic impact of salmon from the two forests translates to over \$1.5 billion, contributing over 10,000 jobs in Alaska (Chilcote et al. 2017, USDA 2017).
- » Some salmon stocks occur in glaciated systems. For instance, over 1,500 miles of Tongass National Forest streams originate in glacial watersheds. Most of these provide important fish spawning and rearing



habitat, contributing to commercial, recreation, and traditional use fisheries (EcoAdapt 2014).

- » Melting glaciers will change streamflow, often displayed as a hydrograph (see Figure 5) on associated streams, altering fish habitat. However, the diversity, redundancy, and intact nature of watersheds in the region are expected to provide resilience against these changes, suggesting that predicting short term consequences for salmon will require drainage-specific assessments (Chilcote et al. 2017).
- » Fishing reflects vital relationships of people and land that are woven into the history, cultural identity, and community life of Alaskans. Many Alaskan communities have a strong tie to Pacific salmon and the particular characteristics of local rivers and lakes. Alaskans consume significantly more fish than the average U.S. citizen (Nobmann et al. 1992). Changes in salmon populations influence the formal and informal economies and culture of Alaska coastal communities (Thornton 1998). Deliberate approaches to social, economic, and cultural adaptation will aid communities responding to potential changes in salmon distribution and abundance.
- » Glaciers fascinate people, particularly tidewater glaciers that dramatically release mountains of ice into marine waters. The aesthetic value of glaciers is apparent from cruise ship advertisements for Alaska—virtually every website and advertisement

includes striking glacier views. Mendenhall Glacier near Juneau attracts over 600,000 visitors a year. As tidewater glaciers retreat, views of and access to calving glaciers will decline (Erickson et al. 2017). In addition to aesthetic and ecological consequences, changing glaciers will influence local economies.



Tourists view Mendenhall Glacier near Juneau, AK (© for thachakul/Shutterstock).

### Glacier Dynamics—Management Response Options

1. Inventory and assess areas where glacier outwash floods threaten agency infrastructure or users of national forest lands. Develop safety plans and evaluate modifications to infrastructure in vulnerable watersheds.
2. Incorporate potential for glacier outwash floods and changing viewsapes in the design and location of new infrastructure such as trailheads, trails, roads, campgrounds, cabins, administrative sites, and fish habitat improvements.
3. Collaborate with and educate ecotourism establishments and other businesses that rely on glacier viewsapes. For instance, adapt permits as the views change, the potential for resource damage increases, seabird concentration areas shift, and possible safety issues emerge. Inform the public and permittees of expected changes in key glacier systems that currently attract thousands of visitors.
4. Work closely with local communities reliant on aquatic subsistence resources to develop a common



Dip netters—here at the mouth of the Kenai River—contribute an average of 116 pounds of fish annually to each participating family.



understanding of potential changes in local fisheries as tidewater glaciers recede and stream dynamics change. Dialogue should include an emphasis on the time scale of changes (which in some cases will be very long) and the potential for certain food resources to increase as others decrease.

5. Fish habitat restoration efforts can consider the potential to incorporate changes in streamflow patterns resulting from glacier melt (see Figure 5) into expectations for stream geomorphology, temperature, water chemistry, and sediment. Consider changes in glacier melt when setting restoration priorities among watersheds and among reaches within watersheds.

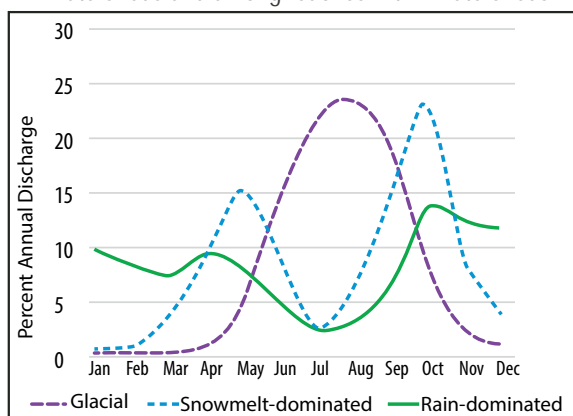


Figure 5 - Characteristic hydrographs for three watershed types in coastal temperate rainforest of the Alaska Region: glacial, snowmelt-dominated, and rain-dominated (adapted from [Climate change implications in the northern coastal temperate rainforest of North America](#), Shanley et al. 2015).

### Snow Drought

Forested systems of the Alaska Region are rain-, snow-, and ice-driven systems. Changes in rainfall and snowpack have significant consequences for most elements of the ecological and human environment, including vegetation development and growth, avalanche frequency, road and trail conditions, and runoff for stream systems.

Proximity to the marine environment on the Gulf of Alaska results in winter temperatures often near

freezing, combined with substantial precipitation. Consequently, a small change in temperature results in substantial change in snow accumulation. Although deep accumulations of snow at low elevations along the coast were common in the past—and still occur—the trend of increasing temperatures may result in less frequent snow at low elevations in the future (Littell et al. 2017).

By mid-century, warming trends are projected to result in a snow drought for low-elevation landscapes in both national forests. At elevations below 1,500 feet in the Chugach National Forest, snow-day fraction (proportion of days when precipitation falls as snow) is projected to decrease by 23 percent between October and March, resulting in 26 percent less water in snowpack at winter's end (Littell et al. 2017). Similarly at low elevations, the warm season (when freezes are rare) may increase from 200 to 230 days (Fresco and Floyd 2017).

Conversely, because of increases in winter precipitation, snowpack at high elevations (above 5,000 feet) may increase in the future. See Figure 6.



(Courtesy of Pat Hayward)

Winter sports face an uncertain future in Alaska.



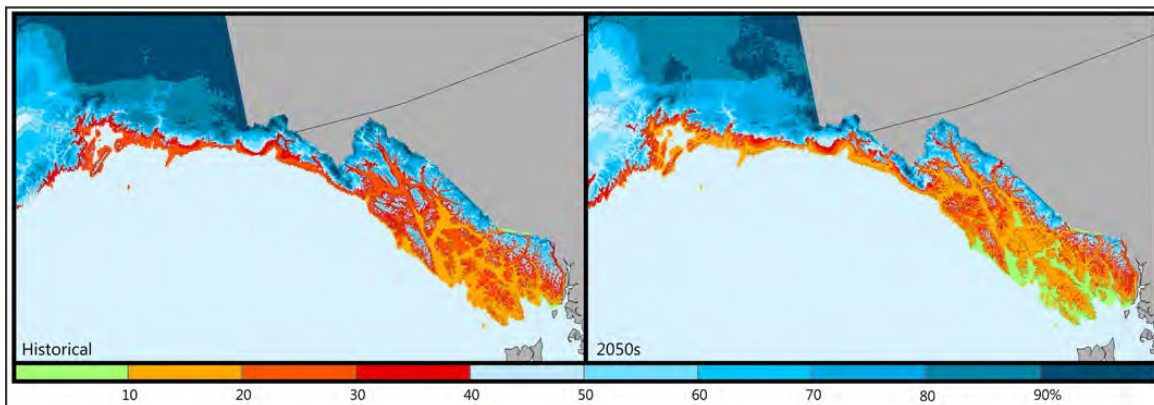


Figure 6 - Snow vulnerability index: the proportion of precipitation falling as snow, compared between the historical period (1971-2000) and 2040-2069. [Click the map](#) for more information.

### Consequences of a Declining Snowpack

Declines in snowpack at lower elevations could have far-reaching consequences by mid-century. Stream conditions and fish habitat, infrastructure, wildlife populations, travelways, recreation, and other socio-economic conditions may be affected.

#### Stream conditions and fish habitat

Stream dynamics—including changes in bank and bed morphology, seasonal patterns of flow, silt and bedload, and water chemistry—are influenced by the source of water (Dery et al. 2009, Schnorbus et al. 2014). Groundwater, runoff from rain, runoff from snow, and rain-on-snow events each result in substantially different stream conditions (Paustian 1992, Battin et al. 2007, Chilcote et al. 2017). As snow becomes less common at low elevations, and snowpack increases at the highest elevations, the dynamics of streams in the region will alter fish habitat (see Figure 5).

- » Reductions in snowpack at lower elevations over the next 60 years on the Chugach National Forest are expected to significantly alter the timing and amount of runoff in 61 of 720 watersheds (Chilcote et al. 2017: 124-130). These vulnerable watersheds are expected to transition from streamflow patterns characteristic of snow-dominated toward patterns characteristic of rain-dominated systems (see Figure 5). Watersheds that transition from snow-dominated to rain-dominated may periodically experience

extreme low flows and high water temperatures, resulting in marginal conditions for some fish species and the potential for fish mortality (Isaak et al. 2012).

- » Outer islands in the southern Tongass National Forest could experience the largest decrease in snowfall, receiving little or no snowfall (EcoAdapt 2014). Hence, streams in these areas will transition from snowmelt to rain-fed systems, significantly altering the hydrograph (see Figure 5).

In the Alaska Region, freshwater systems used by salmon are largely intact and resilient to change, suggesting that shifts in the hydrograph may favor one species over another, but not result in broad scale declines in the capacity of most freshwater systems (EcoAdapt 2014, Chilcote et al. 2017, Schoen et al., 2017).

#### Infrastructure

Although average snowpack is projected to decline in coming decades, high variability in snow accumulation, combined with the potential for more severe storms, may lead to occasional deep snowpack and significant rain-on-snow events. Snowpack and melt conditions have the potential to damage infrastructure.

- » High runoff following rain-on-snow events, increased glacier melt, and very high snowpack



may exceed the capacity of road culverts, leading to road washout and damage.

- » Land and snowslides or extraordinary snowloads threaten recreational cabins, campground structures, utility structures, road-based travel, and administrative buildings, posing potential safety risks.

**Wildlife populations**

Snow conditions represent a critical feature of wildlife habitat. Changes in the distribution and timing of snow will alter habitat conditions favoring some species and reducing habitat quality for others. Examples of important relationships between wildlife and snow include the following:

- » Subnivean (under snow) environments protect small animals and plants from extreme cold in winter (Pauli et al. 2013, Emers et al. 1995). Similarly, wolverine rely on snow dens during winter to reduce energy expenditure, provide thermal cover, and care for young during winter (McKelvey et al. 2011).
- » Snow conditions, including depth and stability of snowpack, influence the ability of Sitka black-tailed deer to forage, deer and wolf mobility, and predator-prey dynamics (Person et al. 1996).

**Travelways for recreation and food procurement**

Snow, river ice, and frozen soils facilitate winter travel in portions of the region. As the growing season lengthens, the “mud season” will extend later in the autumn and begin earlier in the spring, while snowpack suitable for skiing and snow machine travel will occur for less of the winter.

- » Existing recreation trailheads could become stranded below elevations with sufficient snow for snow machines and backcountry ski access. Where

over-snow motorized vehicles are allowed, there may not be adequate snow to prevent vegetation damage.

- » Most cabins, day use sites, trailheads, and campgrounds are below 1,500 feet where reductions in snowpack are projected to be greatest. Consequently, the period of snow-free use will increase resulting in higher maintenance costs. Users who enjoy winter sports associated with trails will experience reduced opportunities and may choose to recreate elsewhere.
- » During the next 30 years, the extended snow-free period at low and mid elevations is expected to reduce the winter recreation season by an average of 0.5 to 1 day per year (15 to 30 days total reduction) (Littell et al. 2017).
- » Winter access to subsistence resources (e.g., hunting, trapping) will be altered at traditional low elevation access points with less snow and frozen soils. A reduced snow depth will allow Sitka black-tailed deer to remain dispersed throughout the winter, reducing the success of subsistence hunters.

**Socio-economic and ecosystem services**

- » Strong economic, social, and cultural relationships between salmon and human communities suggest that changes in snowpack will have economic and cultural ramifications resulting from changes in the timing and abundance of salmon runs. The complex salmon lifecycle, however, makes it difficult to predict outcomes for salmon and therefore for social, economic, and cultural systems (Chilcote et al. 2017).



- » Winter transportation with sled dogs, sled dog racing, and recreational mushing are part of Alaska Native culture and modern social traditions in Alaska. Declines in snowpack led to recent cancellations (two consecutive years for the World Champion sprint dog race) as well as changes in major sled dog races (three changes in five years for the Iditarod). These events draw thousands of tourists.
  - » Heli-skiing and other forms of powder-dependent snow sports represent significant economic elements of the tourist industry, particularly in small communities. Locations such as Valdez have significant potential for snow sports expansion as skiers and snowboarders from the conterminous U.S. seek out dependable high-elevation snowpack (McDowell Group 2015, Littell et al. 2017).
  - » As low elevation areas become stranded below the snowline, the Alaska Region may see a shift from downhill skiing and other snow sports to high elevation activities and other activities like hiking and biking (Hayward et al. 2017).
4. Anticipate high variation in Sitka black-tailed deer winter habitat conditions as annual snowpack varies. Accommodate altered overwinter survival through close collaboration with state agencies on subsistence and sport harvest, road openings, and associated travel management to respond to short-term changes in deer abundance.
  5. Employ stream restoration to replace large wood (logs) in streams and floodplains where instream wood and streamside trees were removed during logging in the 1960-70s. The wood restores ecological function, creating complex habitat for salmon (Trombulak and Frissell 2000). Restoring stream function and connections to floodplain habitat improve stream and fish resilience to climatic changes.

### Snow Drought—Management Response Options

1. Employ snow modeling to aid in prioritizing relocation of current recreation infrastructure to support backcountry skiing and snow machine travel. Consider flexible trailhead locations to accommodate variation in snowlines and access to sufficient snow for winter sports. Employ variable snow sport season openings to ensure sufficient snowpack to prevent resource damage.
2. Incorporate expectations for longer “mud-seasons” and higher than normal overland runoff into design and maintenance of trails. Consider temporary closures for some modes of travel when safety issues or damage to resources caused by mud or flooding are likely.
3. Design recreation infrastructure (e.g., recreation cabins, trail bridges, trail drainage systems) to accommodate larger storm events including higher snowloads, overland flow, and higher streamflow.



Stream restoration on West Middle Fork Stoney Creek, Prince of Wales Island, AK





6. Develop a common understanding with national forest users about the declining snowpacks at low elevations and potential consequences for recreation and infrastructure.
7. Discuss potential changes and resilience in salmon populations with stakeholders who use salmon originating on national forest lands. Prepare the public for potential fish kills in stream systems prone to temperature increases.
8. Evaluate and alter drainage structures, roads, and other infrastructure (e.g., relocate roads out of floodplains) so they are not restricting flow from a main channel to a floodplain, restricting fish access to upstream habitats, or increasing scouring of spawning gravels (Sloat et al. 2016).
9. Employ riparian restoration where past management has damaged riparian function or altered floodplain dynamics. Promote alder based on agency guidelines (see [Tongass Young Growth Strategy](#)). Encourage development of large trees in young-growth riparian areas to deliver large wood to streams. Select project sites strategically to focus on conifer-dominated stands to get big trees faster. Place thinned wood in stream for restoration if warranted.
10. Maintain roads and other infrastructure to avoid erosion. Decommission and remove roads or infrastructure where possible to accommodate gradual flow into floodplains. Add culverts or water bars to disconnect streams from roads.
11. Replace or augment structures (e.g., culverts, bridges) to accommodate peak flows, and storm proof roads.
12. Evaluate the potential for fish passage barriers developing during low flows and consider options for altering the barriers.

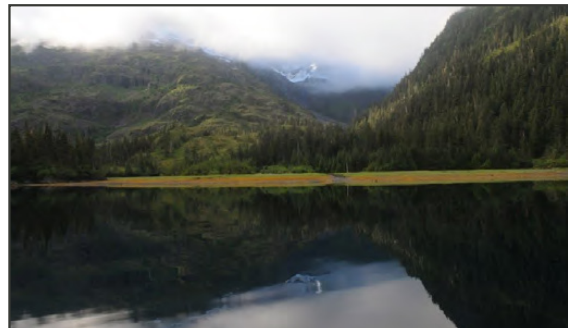
### Vegetation Distribution, Disturbance Dynamics, and Associated Soils

Climate, particularly the availability of water, strongly influences plant species distributions,

influencing how plant communities and biomes develop over centuries to millennia. The Alaska Region has exhibited directional vegetation change for thousands of years—the region was largely ice covered 14,000 years ago. The temperate coastal rainforests in Chugach National Forest formed only about 2,000 years ago (Ager 2007, Hollingsworth 2017).

Vegetation development continues as glaciers retreat and new land is exposed. As temperature and growing seasons increase, vegetation and soils will continue to change in the future (Fresco and Floyd 2017).

Temperate coastal rainforest is the dominant forest vegetation in southcentral Alaska. Modeling of biomes and species climate envelopes suggests that these rainforests are quite stable and distribution is not expected to shift appreciably, although distribution and abundance of some species could change (Hollingsworth et al. 2017).



*Barnes Cove at Knight Island supports productive tidewater wetlands and temperate coastal rainforest resulting from a combination of rain, snow, ice, and high tidal flux. Forests in this area will likely to remain similar in composition and structure while the other vegetation types will continue to change following the directional trajectory dictated by water dynamics.*

In contrast, outside the coastal rainforest, conifer and shrub communities on the Kenai Peninsula have been moving upward in elevation 30 feet per decade since 1950 (Dial et al. 2007). The rise in treeline is expected to continue the process of afforestation, potentially reducing alpine vegetation.



Other expected changes in vegetation and associated processes include:

**Carbon sequestration**

The Tongass National Forest stores 650 million tons of above-ground carbon (Barrett 2014)—more carbon than any other national forest. As temperatures warm, the capacity for soil decomposition to increase may result in net carbon loss (D’Amore et al. 2015, Fellman et al. 2017) while above-ground carbon storage may continue to increase. For more information, see [Storage and Flux of Carbon in Live Trees, Snags, and Logs in the Chugach and Tongass National Forests](#) (Barrett 2014) and [Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units](#) (USDA Forest Service 2015).

**Yellow-cedar**

Yellow-cedar is an especially important tree in Alaska. Its wood is valued as a commercial product and the cultural value to Alaska Native people stems from its use for shelter, clothing, canoe paddles, and totem poles (Turner 1998).

Yellow-cedar mortality is strongly linked to water dynamics associated with climate. Injury to fine roots occurs when low snowpack and poorly drained soils results in springtime freezing of roots (Hennon et al. 2012).

During the past century, yellow-cedar stands covering 200,000 acres experienced mortality of 70 percent or more, although this represents a small portion of the total distribution of the species whose basal area has recently increased as distribution expanded (Barrett and Christensen 2011, Barrett and Pattison 2017). See Figure 7.

**Wildfire**

Large wildfires are rare in Alaskan national forests and are expected to remain rare in the temperate coastal rainforest (Barrett and Christensen 2011, Hollingsworth et al. 2017). Only national forest lands in the far western portion of the Alaska Region, which support transition boreal forests, are prone to periodic wildfires.

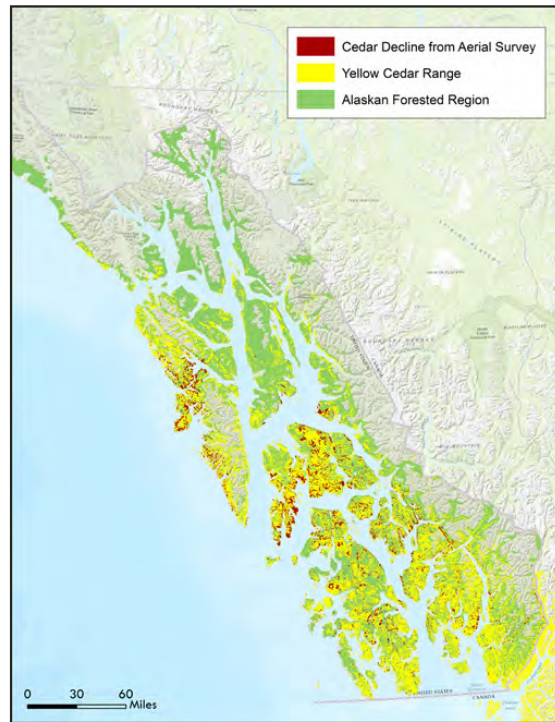


Figure 7 - Occurrence of yellow-cedar decline in southeast Alaska ([click on the map](#) for more information).

Evaluation of future fire risk and rural development indicates that vulnerability of property to fire in this area will increase in the next 50 years. The value of structures at risk to fire on the Kenai Peninsula is projected to grow by 66 percent on private lands by 2065—an estimated \$3.8 billion in 2016 dollars. (Hollingsworth et al. 2017). Most of this occurs to the west of Chugach National Forest but influences fire suppression on national forest lands.

**Forest insects and disease**

Threats to trees from insects and pathogens may increase when water dynamics change as a result of climbing temperatures and longer growing seasons (Hollingsworth et al. 2017). Widespread deciduous tree defoliation or extensive mortality of conifers would alter habitat conditions for animals and change the visual landscape for tourists.



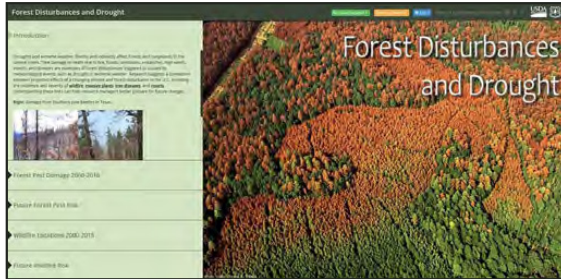


Figure 8 - The [Forest Disturbances and Drought](#) story map has information and maps about wildfire, insects, and disease throughout the U.S. Click on the image to access.

### Vegetation Distribution, Disturbance Dynamics, and Associated Soils—Management Response Options

1. Consider salvage of yellow-cedar in stands with high mortality to meet a portion of the cultural and economic demand for this high value tree. A focus on stands affected by high levels of mortality within timber management areas could shift some timber production from currently healthy forests (Hennon et al. 2016).

2. Continue to employ snow modeling and mapping of current yellow-cedar distribution to identify areas that have a high probability of sustaining robust stands in the future. Use results of modeling to design forest management prescriptions in lands currently identified for timber production, and to evaluate the broader conservation framework (Hannon et al. 2016).
3. Employ existing tools to evaluate probability of natural yellow-cedar establishment following timber harvest, to prioritize sites for regeneration.
4. Continue close collaboration with local governments developing plans for wildfire response, vegetation management, and public education on the Kenai Peninsula.
5. Employ silvicultural prescriptions that promote regeneration of a diversity of tree species within timber harvest areas to promote resistance to insects and pathogens.

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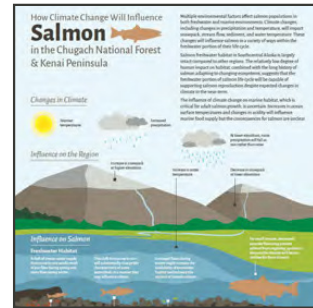
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### Educational Posters

[How Climate Change Will Influence the Chugach National Forest and Kenai Peninsula](#) describes impacts on features and resources of the national forest lands and waters.



[How Climate Change Will Influence Salmon in the Chugach National Forest and Kenai Peninsula](#) describes multiple environmental factors that affect salmon populations in both freshwater and marine environments.



*This fact sheet was written by Greg Hayward, Erik Johnson, Nathan Walker, Jeremy Littell, and Julianne Thompson. This product summarizes work completed by others and would not have been possible without the numerous contributions in the literature cited. Any errors or omissions remain the responsibility of the authors.*

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12/19/17 version



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# Fall 2020 Regional Advisory Council Meeting Calendar

*Last updated on 11/12/19*

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Aug. 16	Aug. 17 <i>Window opens</i>	Aug. 18 <b>NS — Point Hope</b>	Aug. 19	Aug. 20	Aug. 21	Aug. 22
Aug. 23	Aug. 24	Aug. 25	Aug. 26	Aug. 27	Aug. 28	Aug. 29
<b>K/A — Unalaska (in conjunction with “Life Forum Conference”)</b>						
Aug. 30	Aug. 31	Sep. 1	Sep. 2	Sep. 3	Sep. 4	Sep. 5
Sep. 6	Sep. 7 <b>LABOR DAY HOLIDAY</b>	Sep. 8	Sep. 9	Sep. 10	Sep. 11	Sep. 12
				<b>K/A — Cold Bay/Sand Point</b>		
Sep. 13	Sep. 14	Sep. 15	Sep. 16	Sep. 17	Sep. 18	Sep. 19
Sep. 20	Sep. 21	Sep. 22	Sep. 23	Sep. 24	Sep. 25	Sep. 26
		<b>YKD — St. Mary’s</b>				
Sep. 27	Sep. 28	Sep. 29	Sep. 30	Oct. 1	Oct. 2	Oct. 3
Oct. 4	Oct. 5	Oct. 6	Oct. 7	Oct. 8	Oct. 9	Oct. 10
			<b>SC — Anchorage</b>			
Oct. 11	Oct. 12 <b>COLUMBUS DAY HOLIDAY</b>	Oct. 13	Oct. 14	Oct. 15	Oct. 16	Oct. 17
			<b>WI — Aniak</b>			
			<b>EI — Fairbanks</b>			
Oct. 18	Oct. 19	Oct. 20	Oct. 21	Oct. 22	Oct. 23	Oct. 24
		<b>SE — Sitka</b>			<b>AFN — Anchorage</b>	
Oct. 25	Oct. 26	Oct. 27	Oct. 28	Oct. 29	Oct. 30	Oct. 31
			<b>SP — Nome</b>			
			<b>BB — Dillingham</b>			
Nov. 1	Nov. 2	Nov. 3	Nov. 4	Nov. 5	Nov. 6 <i>Window closes</i>	Nov. 7
		<b>NW — Kotzebue</b>				

## Winter 2021 Regional Advisory Council Meeting Calendar

Due to travel budget limitations placed by Department of the Interior on the U.S. Fish and Wildlife Service and the Office of Subsistence Management, the dates and locations of these meetings will be subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>Feb. 14</i>	<i>Feb. 15</i> <b>PRESIDENT'S DAY HOLIDAY</b>	<i>Feb. 16</i> <i>Window Opens</i>	<i>Feb. 17</i>	<i>Feb. 18</i>	<i>Feb. 19</i>	<i>Feb. 20</i>
<i>Feb. 21</i>	<i>Feb. 22</i>	<i>Feb. 23</i>	<i>Feb. 24</i>	<i>Feb. 25</i>	<i>Feb. 26</i>	<i>Feb. 27</i>
<i>Feb. 28</i>	<i>Mar. 1</i>	<i>Mar. 2</i>	<i>Mar. 3</i>	<i>Mar. 4</i>	<i>Mar. 5</i>	<i>Mar. 6</i>
<i>Mar. 7</i>	<i>Mar. 8</i>	<i>Mar. 9</i>	<i>Mar. 10</i>	<i>Mar. 11</i>	<i>Mar. 12</i>	<i>Mar. 13</i>
<i>Mar. 14</i>	<i>Mar. 15</i>	<i>Mar. 16</i>	<i>Mar. 17</i>	<i>Mar. 18</i>	<i>Mar. 19</i>	<i>Mar. 20</i>
<i>Mar. 21</i>	<i>Mar. 22</i>	<i>Mar. 23</i>	<i>Mar. 24</i>	<i>Mar. 25</i>	<i>Mar. 26</i> <i>Window Closes</i>	<i>Mar. 27</i>

## Subsistence Regional Advisory Council Correspondence Policy

The Federal Subsistence Board (Board) recognizes the value of the Regional Advisory Councils' role in the Federal Subsistence Management Program. The Board realizes that the Councils must interact with fish and wildlife resource agencies, organizations, and the public as part of their official duties, and that this interaction may include correspondence. Since the beginning of the Federal Subsistence Program, Regional Advisory Councils have prepared correspondence to entities other than the Board. Informally, Councils were asked to provide drafts of correspondence to the Office of Subsistence Management (OSM) for review prior to mailing. Recently, the Board was asked to clarify its position regarding Council correspondence. This policy is intended to formalize guidance from the Board to the Regional Advisory Councils in preparing correspondence.

The Board is mindful of its obligation to provide the Regional Advisory Councils with clear operating guidelines and policies, and has approved the correspondence policy set out below. The intent of the Regional Advisory Council correspondence policy is to ensure that Councils are able to correspond appropriately with other entities. In addition, the correspondence policy will assist Councils in directing their concerns to others most effectively and forestall any breach of department policy.

The Alaska National Interest Lands Conservation Act Title VIII required the creation of Alaska's Subsistence Regional Advisory Councils to serve as advisors to the Secretary of the Interior and the Secretary of Agriculture and to provide meaningful local participation in the management of fish and wildlife resources on Federal public lands. Within the framework of Title VIII and the Federal Advisory Committee Act, Congress assigned specific powers and duties to the Regional Advisory Councils. These are also reflected in the Councils' charters. (*Reference: ANILCA Title VIII §805, §808, and §810; Implementing regulations for Title VIII, 50 CFR 100 .11 and 36 CFR 242 .11; Implementing regulations for FACA, 41 CFR Part 102-3.70 and 3.75*)

The Secretaries of Interior and Agriculture created the Federal Subsistence Board and delegated to it the responsibility for managing fish and wildlife resources on Federal public lands. The Board was also given the duty of establishing rules and procedures for the operation of the Regional Advisory Councils. The Office of Subsistence Management was established within the Federal Subsistence Management Program's lead agency, the U.S. Fish and Wildlife Service, to administer the Program. (*Reference: 36 CFR Part 242 and 50 CFR Part 100 Subparts C and D*)

### Policy

1. The subject matter of Council correspondence shall be limited to matters over which the Council has authority under §805(a)(3), §808, §810 of Title VIII, Subpart B §\_\_.11(c) of regulation, and as described in the Council charters.
2. Councils may, and are encouraged to, correspond directly with the Board. The Councils are advisors to the Board.
3. Councils are urged to also make use of the annual report process to bring matters to the Board's attention.

4. As a general rule, Councils discuss and agree upon proposed correspondence during a public meeting. Occasionally, a Council chair may be requested to write a letter when it is not feasible to wait until a public Council meeting. In such cases, the content of the letter shall be limited to the known position of the Council as discussed in previous Council meetings.
5. Except as noted in Items 6, 7, and 8 of this policy, Councils will transmit all correspondence to the Assistant Regional Director (ARD) of OSM for review prior to mailing. This includes, but is not limited to, letters of support, resolutions, letters offering comment or recommendations, and any other correspondence to any government agency or any tribal or private organization or individual.
  - a. Recognizing that such correspondence is the result of an official Council action and may be urgent, the ARD will respond in a timely manner.
  - b. Modifications identified as necessary by the ARD will be discussed with the Council chair. Councils will make the modifications before sending out the correspondence.
6. Councils may submit written comments requested by federal land management agencies under ANILCA §810 or requested by regional Subsistence Resource Commissions under §808 directly to the requesting agency. Section 808 correspondence includes comments and information solicited by the SRCs and notification of appointment by the Council to an SRC.
7. Councils may submit proposed regulatory changes or written comments regarding proposed regulatory changes affecting subsistence uses within their regions to the Alaska Board of Fisheries or the Alaska Board of Game directly. A copy of any comments or proposals will be forwarded to the ARD when the original is submitted.
8. Administrative correspondence such as letters of appreciation, requests for agency reports at Council meetings, and cover letters for meeting agendas will go through the Council's regional coordinator to the appropriate OSM division chief for review.
9. Councils will submit copies of all correspondence generated by and received by them to OSM to be filed in the administrative record system.
10. Except as noted in Items 6, 7, and 8, Councils or individual Council members acting on behalf of or as representative of the Council may not, through correspondence or any other means of communication, attempt to persuade any elected or appointed political officials, any government agency, or any tribal or private organization or individual to take a particular action on an issue. This does not prohibit Council members from acting in their capacity as private citizens or through other organizations with which they are affiliated.



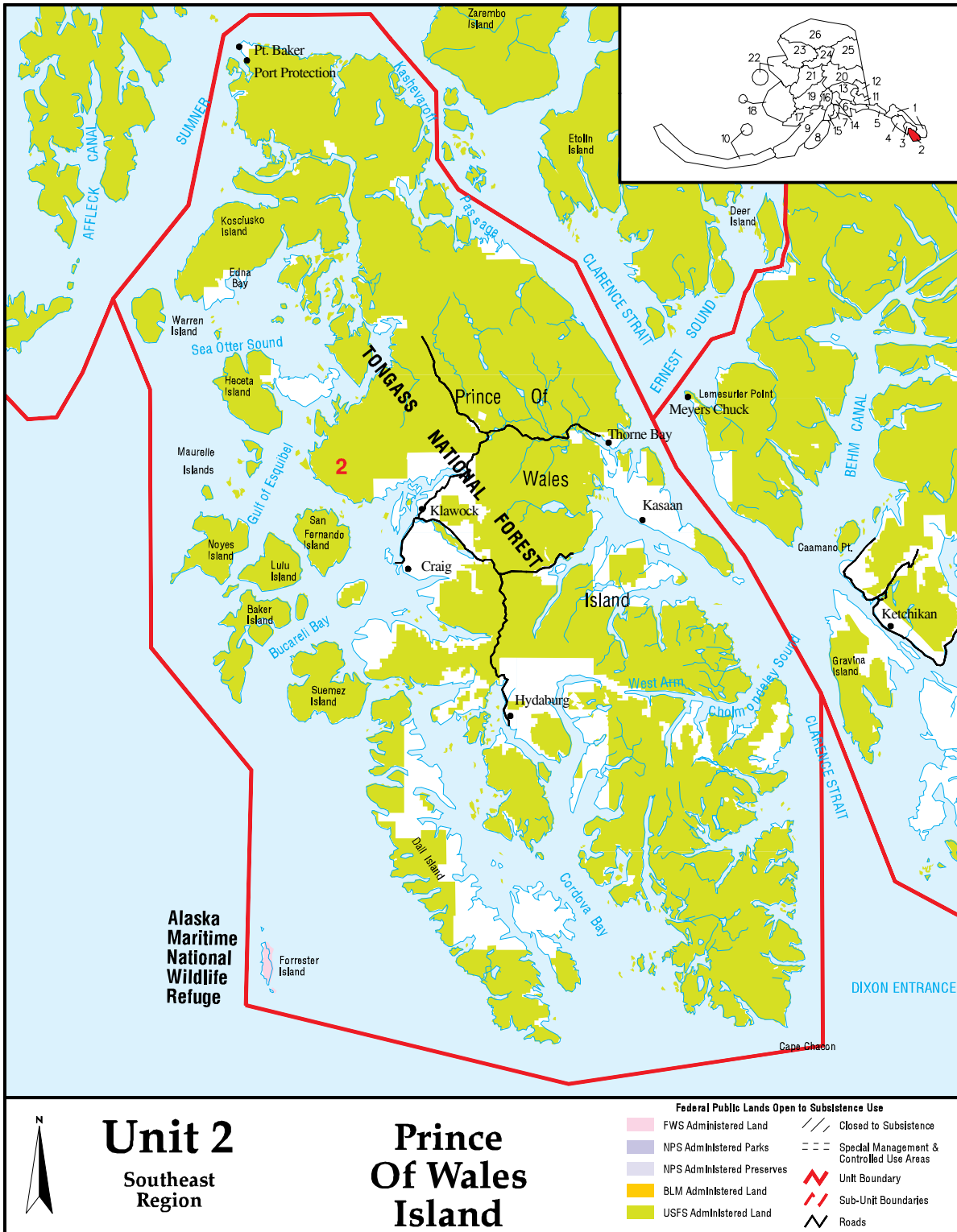
# Hunting / Unit I

# Southeast Mainland



# Hunting / Unit 2

# Southeast Mainland







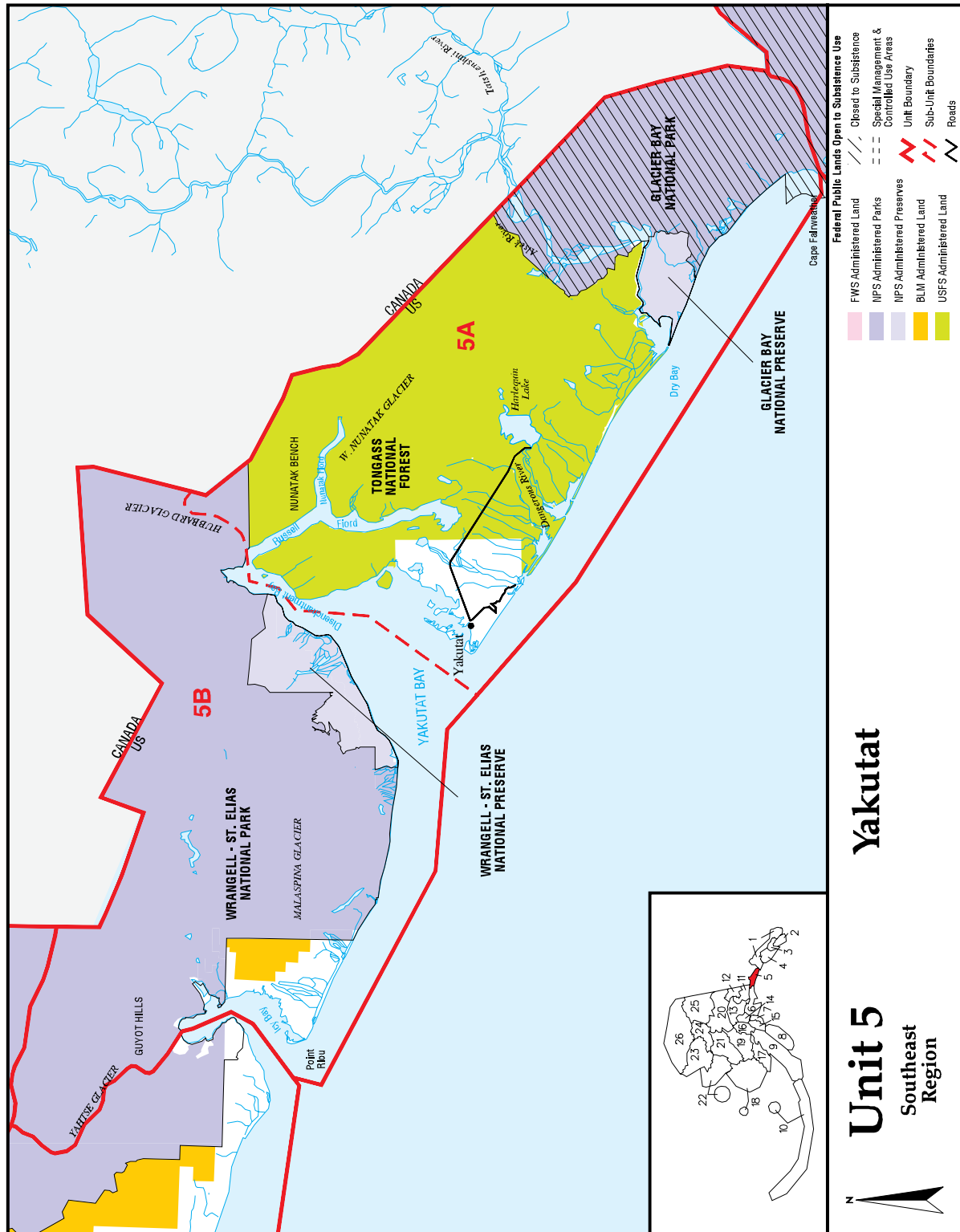
# Hunting / Unit 4

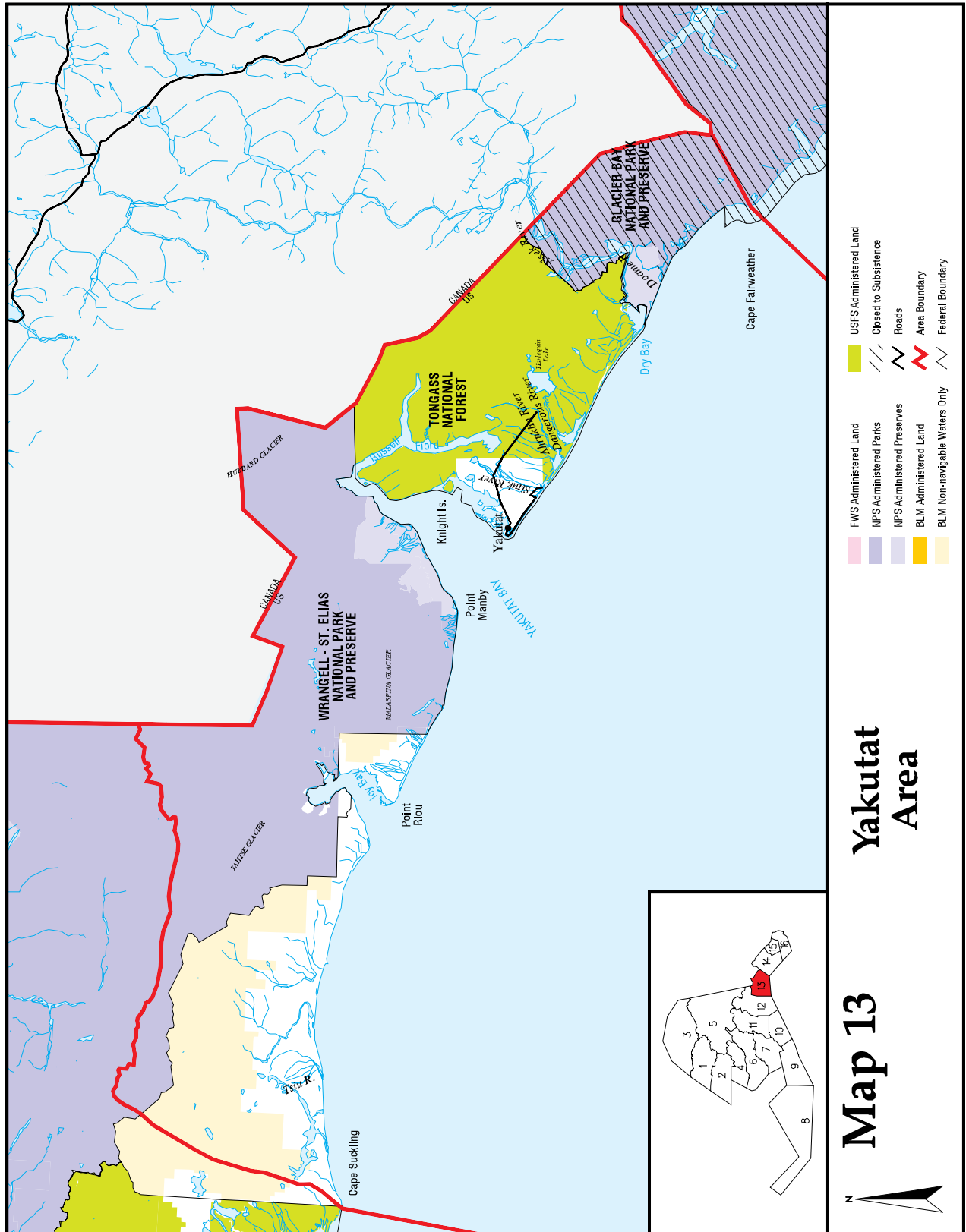
# Admiralty-Baranof-Chichagof



# Yakutat

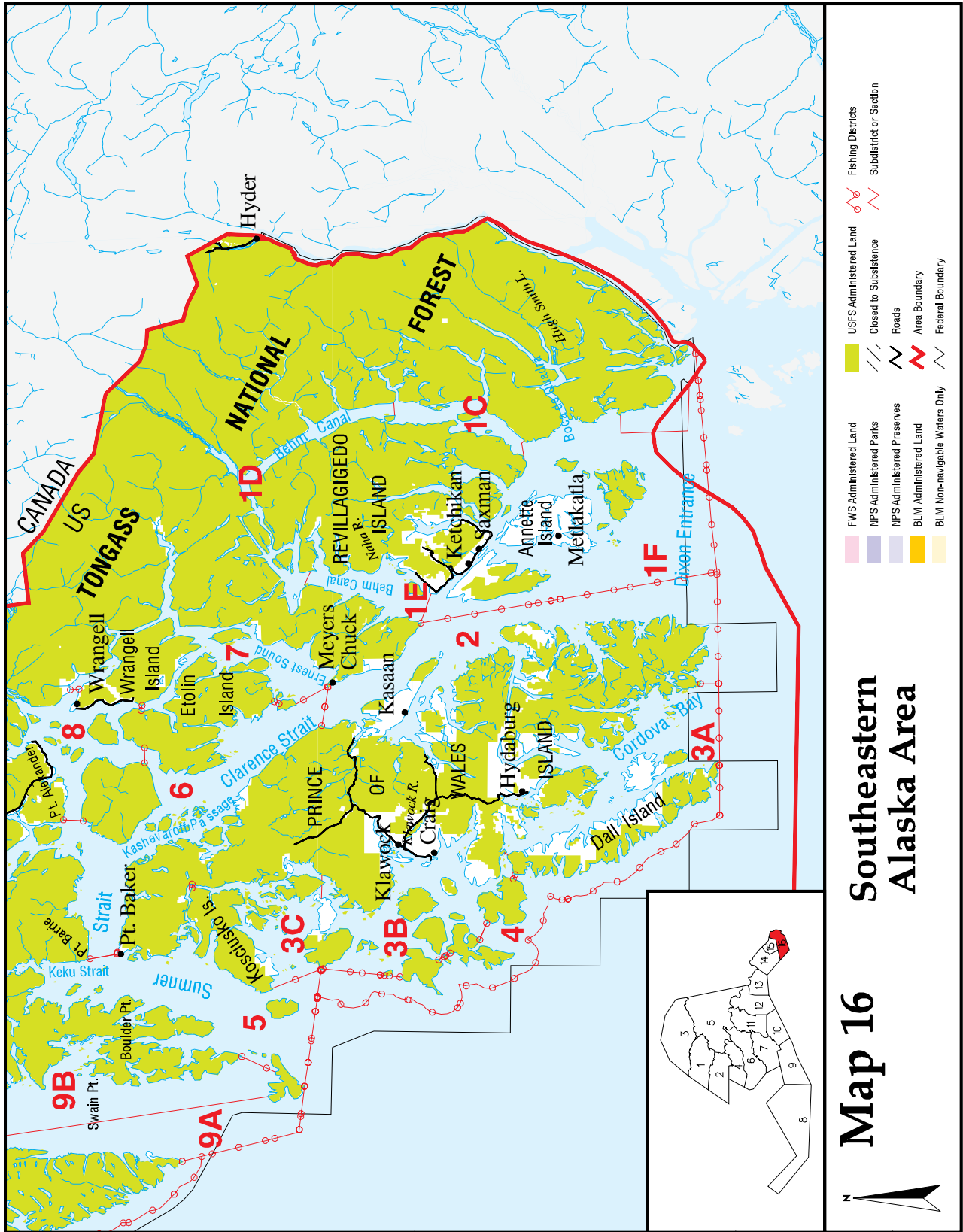
# Unit 5 / Hunting











**Department of the Interior  
U. S. Fish and Wildlife Service**

**Southeast Alaska Subsistence Regional Advisory Council**

**Charter**

1. **Committee's Official Designation.** The Council's official designation is the Southeast Alaska Subsistence Regional Advisory Council (Council).
2. **Authority.** The Council is renewed by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. 3115 (1988)) Title VIII, and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is regulated by the Federal Advisory Committee Act (FACA), as amended, (5 U.S.C. Appendix 2).
3. **Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the Region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the Region.
4. **Description of Duties.** Council duties and responsibilities, where applicable, are as follows:
  - a. Recommend the initiation, review, and evaluation of proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the Region.
  - b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the Region.
  - c. Encourage local and regional participation in the decision-making process affecting the taking of fish and wildlife on the public lands within the region for subsistence uses.
  - d. Prepare an annual report to the Secretary containing the following:
    - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the Region;
    - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the Region;

- (3) A recommended strategy for the management of fish and wildlife populations within the Region to accommodate such subsistence uses and needs; and
  - (4) Recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.
- e. Appoint one member to the Wrangell-St. Elias National Park Subsistence Resource Commission in accordance with section 808 of the ANILCA.
- f. Make recommendations on determinations of customary and traditional use of subsistence resources.
- g. Make recommendations on determinations of rural status.
- h. Provide recommendations on the establishment and membership of Federal local advisory committees.
- i. Provide recommendations for implementation of Secretary's Order 3347: Conservation Stewardship and Outdoor Recreation, and Secretary's Order 3356: Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories. Recommendations shall include, but are not limited to:
  - (1) Assessing and quantifying implementation of the Secretary's Orders, and recommendations to enhance and expand their implementation as identified;
  - (2) Policies and programs that:
    - (a) increase outdoor recreation opportunities for all Americans, with a focus on engaging youth, veterans, minorities, and other communities that traditionally have low participation in outdoor recreation;
    - (b) expand access for hunting and fishing on Bureau of Land Management, U.S. Fish and Wildlife Service, and National Park Service lands in a manner that respects the rights and privacy of the owners of non-public lands;
    - (c) increase energy, transmission, infrastructure, or other relevant projects while avoiding or minimizing potential negative impacts on wildlife; and
    - (d) create greater collaboration with States, Tribes, and/or Territories.
- j. Provide recommendations for implementation of the regulatory reform initiatives and policies specified in section 2 of Executive Order 13777: Reducing



Regulation and Controlling Regulatory Costs; Executive Order 12866: Regulatory Planning and Review, as amended; and section 6 of Executive Order 13563: Improving Regulation and Regulatory Review. Recommendations shall include, but are not limited to:

Identifying regulations for repeal, replacement, or modification considering, at a minimum, those regulations that:

- (1) eliminate jobs, or inhibit job creation;
- (2) are outdated, unnecessary, or ineffective;
- (3) impose costs that exceed benefits;
- (4) create a serious inconsistency or otherwise interfere with regulatory reform initiative and policies;
- (5) rely, in part or in whole, on data or methods that are not publicly available or insufficiently transparent to meet the standard for reproducibility; or
- (6) derive from or implement Executive Orders or other Presidential and Secretarial directives that have been subsequently rescinded or substantially modified.

All current and future Executive Orders, Secretary's Orders, and Secretarial Memos should be included for discussion and recommendations as they are released. At the conclusion of each meeting or shortly thereafter, provide a detailed recommendation meeting report, including meeting minutes, to the Designated Federal Officer (DFO).

5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$195,000, including all direct and indirect expenses and 1.15 Federal staff years.
8. **Designated Federal Officer.** The DFO is the Subsistence Council Coordinator for the Region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 11, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:

- (a) Approve or call all Council and subcommittee meetings;
- (b) Prepare and approve all meeting agendas;
- (c) Attend all committee and subcommittee meetings;
- (d) Adjourn any meeting when the DFO determines adjournment to be in the public interest; and
- (e) Chair meetings when directed to do so by the official to whom the advisory committee reports.

**9. Estimated Number and Frequency of Meetings.** The Council will meet 1-2 times per year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.

**10. Duration.** Continuing.

**11. Termination.** The Council will be inactive 2 years from the date the charter is filed, unless prior to that date, the charter is renewed in accordance with the provisions of section 14 of the FACA. The Council will not meet or take any action without a valid current charter.

**12. Membership and Designation.** The Council's membership is composed of representative members as follows:

Thirteen members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the region represented by the Council.

To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that nine of the members (70 percent) represent subsistence interests within the region and four of the members (30 percent) represent commercial and sport interests within the region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

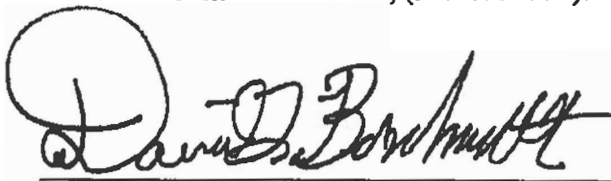
Members will be appointed for 3-year terms. Members serve at the discretion of the Secretary.

Alternate members may be appointed to the Council to fill vacancies if they occur out of cycle. An alternate member must be approved and appointed by the Secretary before attending the meeting as a representative. The term for an appointed alternate member will be the same as the term of the member whose vacancy is being filled.

Council members will elect a Chair, Vice-Chair, and Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under section 5703 of title 5 of the United States Code.

13. **Ethics Responsibilities of Members.** No Council or subcommittee member will participate in any Council or subcommittee deliberations or votes relating to a specific party matter before the Department or its bureaus and offices including a lease, license, permit, contract, grant, claim, agreement, or litigation in which the member or the entity the member represents has a direct financial interest.
14. **Subcommittees.** Subject to the DFOs approval, subcommittees may be formed for the purpose of compiling information or conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.
15. **Recordkeeping.** Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, must be handled in accordance with General Records Schedule 6.2, and other approved Agency records disposition schedule. These records must be available for public inspection and copying, subject to the Freedom of Information Act, (5 U.S.C. 552).



Secretary of the Interior

DEC 12 2019

Date Signed

DEC 13 2019

Date Filed





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