



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

Don Hernandez, Chairman  
c/o Office of Subsistence Management  
U.S. Fish and Wildlife Service  
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**MAY 12 2020**

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

Dear Chairman Christianson:

The Southeast Alaska Subsistence Regional Advisory Council (Council) submits this FY-2019 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 held via teleconference. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Southeast 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 Management 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. These 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 Program**

The Council is unsure whether funding or a funding mechanism currently exists for wildlife research management projects for Southeast Alaska. The Council would like to receive more information on a future Wildlife Resource Monitoring Program and a status report on funding availability. The Council would appreciate information on current funding and any other funding options so that it may share it with organizations who are interested in engaging in wildlife research for the purposes of collecting data for management of subsistence resources in this region.

## **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 correspondence 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 it. The Council submitted eight letters. One of those letters was processed timely. The remaining eight 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 this inadequate 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 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 Alaska Board of Fisheries (BOF) 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 BOF 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.

#### **8. Status of Fish and Wildlife Resources in Southeast**

Pursuant to ANILCA Title VIII Section 805, this Council recognizes the importance of providing the Board with as much information about its region as possible so that it can make informed regulatory decisions. To that end, this Council has decided to routinely report on the status of fish and wildlife populations and the harvests within the region. Enclosures to this Annual Report entitled "Subsistence Sockeye Harvest and Escapement" and "Wildlife Harvest Summary" provide recent overviews of these subsistence resources.

In closing, the Council would like to express that in-person meetings are essential to provide a public forum to subsistence users and for the Council to be able to successfully conduct its business. While the Council understands the circumstances that required some Councils to conduct their meetings telephonically during this last meeting cycle, this method distanced the public from the public process and the Council. It was challenging for people to call in and get through, due to limited line capacities, dropped calls, and poor quality of connection. This made for a cumbersome, inefficient meeting, which proved difficult to get regular business done. The Council hopes that telephonic meetings are only required in the future in extremely unique situations, such as the coronavirus outbreak.

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

Enclosures

cc: Federal Subsistence Board  
Southeast Alaska Subsistence Regional Advisory Council  
Susan Detwiler, Assistant Regional Director, Office of Subsistence Management  
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Suzanne Worker, Acting Subsistence Policy Coordinator,  
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Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management  
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Tom Kron, Acting Coordination Division Chief, Office of Subsistence Management  
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