

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SARAH PALIN, Governor

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March 6, 2009

Cherry Payne
Superintendent
Glacier Bay National Park & Preserve
P.O. Box 140
Gustavus, AK 99829

Dear Ms. Payne:

The Citizens' Advisory Commission on Federal Areas has reviewed the Draft Legislative Environmental Impact Statement (DLEIS) for the harvest of Glaucous-Winged Gull eggs by Huna Tlingit in Glacier Bay National Park. We offer the following comments for your consideration in developing the final document and recommendations to Congress .

The original Commission (1982-1999) was extensively involved with resource and management issues in Glacier Bay National Park and Preserve. During that involvement, through discussions and meetings with residents of the region we learned of the long history of subsistence use by the Huna Tlingit of the resources within the area now encompassed by the park. Elders and other residents of Hoonah spoke at Commission meetings and workshops about hunting seal, fishing, berry picking and egg gathering in many parts of Glacier Bay. The cultural importance of the bay to the Huna Tlingit is unquestioned.

In the 1990's the Commission supported efforts by Alaska's Congressional delegation to amend ANILCA to allow subsistence activities within Glacier Bay National Park and Preserve. While the current proposal is quite narrow in its scope, we are encouraged by the possibility that this small and limited level of subsistence use in Glacier Bay may finally be allowed to resume.

Based upon our review of the DLEIS and other technical material provided by your office, the Commission supports Alternative 3, the NPS preferred alternative. The potential impacts from a limited and carefully regulated gathering of gull eggs will not have an adverse effect on park resources and will be consistent with legal mandates for management and the purposes of the park.


The Commission suggests that any proposed legislation be worded to simply authorize the activity and to recognize the cooperation between the National Park Service and the Hoonah

Indian Association under the existing Memorandum of Understanding. Harvest levels, harvest locations, number of harvesters, number of vessel entries, timing and dates for gathering should not be bound by statutory language so that park managers have sufficient flexibility to respond to annual changes or unforeseen events. We also suggest that the number of vessel entries necessary to support egg gathering not be counted as part of the vessel entry limits for the bay.

One issue that is not clear in the DLEIS is the relationship between any future gull egg harvest in Glacier Bay National Park and the annual U.S. Fish and Wildlife Service regulations for the harvest of migratory birds. While these regulations do not currently apply to Glacier Bay because the park is not open to subsistence harvest, would this change should the egg harvest be authorized? Appropriate language to address this issue may need to be included in legislation in order for the NPS to retain management flexibility. This should be discussed in the final LEIS.

Thank you for providing the Commission with the history of this issue as well as an overview of the DLEIS at our meeting in Juneau. Your briefing and the additional material you later provided have been a great help in understanding this issue from a management perspective. We appreciate the opportunity to comment and look forward to a successful completion of this effort.

Sincerely,


for
Rick Schikora
Chairman

Cc: Gov. Sarah Palin
Sen. Lisa Murkowski
Sen. Mark Begich
Rep. Don Young
Sec. Ken Salazar
Hoonah Indian Association