



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7th Avenue, Suite 1430
Anchorage, AK 99501-3561
Main: 907.269-8690
Fax: 907-269-5673

January 11, 2024

Mara Alexander
National Adaptive Management Program Lead
Ecosystem Management Coordination
201 14th Street SW
Washington, DC 20024

Submitted electronically at <https://cara.fs2c.usda.gov/Public/CommentInput?project=ORMS-3585> and via email to mara.alexander@usda.gov

Re: Forest Service Manual chapter 2040, National Forest System Monitoring

Dear Ms. Alexander:

Thank you for the opportunity to comment on the National Forest Service (Service) manual 2000, chapter 2040, National Forest System Monitoring, posted for public comment from December 1, 2023 to January 11, 2024. The objective of the proposed new Chapter 2040 (directive) is to improve the Service's ability to make evidence-based decisions. The State of Alaska (State) Departments of Natural Resources (DNR) and Fish and Game (ADF&G) Alaska National Interest Lands Conservation Act (ANILCA) staff offer the following comments.

The State is fully supportive of the intent to use monitoring to provide information that promotes reasoned, fact-based agency decisions. We also are supportive of the inclusion of Indigenous Knowledge (IK) and other types of knowledge when it meets the high-quality, relevancy, and transparency requirements of the guidance at 67 FR 8452 (February 22, 2002).

Regarding the definition provided for IK, we request the federal land management agencies within the Departments of Agriculture and the Interior settle on one common definition for the term, as well as exempt its applicability to decisions carried out by the Federal Subsistence Board under Title VIII of ANILCA. ANILCA Section 801 specifically required the establishment of an administrative structure to enable rural residents who have personal knowledge of local conditions and requires "local knowledge" to have a meaningful role in the management of fish and wildlife and of subsistence uses on the public lands in Alaska.

It is also important to recognize, in Alaska especially, substantial data limitations may exist depending on the area and resource under consideration. The directive should spell out limitations and the necessity of using lower-quality data should be disclosed when it is the best data available for use in planning.

The State offers the following specific suggestions for modification to the proposed directive.

Section 2040.01 – Authority.

As the manager of fish and wildlife on all lands in Alaska, the ADF&G looks forward to the transparency, coordination, partnerships, and information sharing the directive indicates will occur between the Service, State, and other partners on research and monitoring activities.

We request the Service include a discussion within the guidance regarding consultation with state fish and wildlife agencies in evaluating fish and wildlife monitoring data and results.

A number of relevant statutes appear to be missing from this list including: the Federal Land Management Act and the Alaska National Interest Land Conservation Act, please include these statutes in this section.

Section 2040.03—Policy.

Regarding Principal 1.e. We recommend the addition of a new item 2, moving the other items listed down accordingly.

- 2. Using and producing high-quality information to promote reasoned, fact-based agency decisions.

Regarding Fundamental Principal 3, we recommend adding the following underlined text.

- 3. (Principle 3). Is based on accurate, reliable, and relevant high-quality science and Indigenous Knowledge. The Forest Service identifies and evaluates:

Section 2040.04 – Exhibit 01.

Under Policy Intent, item 3, please add the following underlined text:

- Base monitoring methods on accurate, reliable, relevant, and high-quality science and Indigenous Knowledge, Traditional Ecological Knowledge, user knowledge, and local knowledge.

Many different user groups have long term use of forest service lands and can have accurate, reliable, and high-quality historical knowledge.

Section 2040.04a. National Forest System Deputy Chief

We request the following revisions:

The Deputy Chief's primary roles are to ~~consider the importance of~~ ensure monitoring needed to provide critical information ~~needed~~ for land and resource management is available when setting priorities and budgets to provide implementation resources.

2040.04d – Regional Foresters

We request the addition of the following underlined text,

Regional Foresters or their designees, working closely with Washington Office National Forest System Directors and Unit Supervisors, and state partners as appropriate, convene discussions...

In Alaska, consistent with the Master Memorandum of Understanding¹ between the USDA Forest Service and ADF&G, Regional Foresters should continue to consult and cooperate with State wildlife agencies as appropriate.

Section 2040 – Has the Information Management Council been eliminated? Please clarify.

Section 2040.05 -- Definitions

Assessment. The reference at Forest Service Handbook (FSH) 1909.12.05 directs the reader to the zero-code chapter of the handbook; we recommend it reference 36 Code of Federal Regulations (CFR) 219.5 instead. This ensures the FSH is consistent with codified laws.

Evaluation. We request the retention of a definition for “evaluation” from FSH 1909.12

High-Quality Information. We request the inclusion of the term “High-Quality Information” and the definition for it from the existing Forest Service Manual (FSM) 1940.

High Quality Information means information that promotes reasoned, fact-based agency decisions. Information relied upon or disseminated by the Service must meet the standards for objectivity, utility, integrity, and quality set forth in applicable federal law and policy. Indigenous knowledge may qualify as high-quality information when that knowledge is authoritative, consensually obtained, and meets the standards for high-quality information.

Indigenous Knowledge. Regarding the definition of Indigenous Knowledge, as requested above, we request federal land management agencies (Departments of Agriculture and Interior) collaborate and agree on one term and definition for Indigenous Knowledge/Traditional Knowledge/Traditional Ecological Knowledge/Native Knowledge. These terms are currently used interchangeably, but each is defined differently.

Currently the Service uses the term “Native Knowledge” in their planning regulations at 36 CFR 219.19, but DOI agencies appear to be using the phrase “Indigenous Knowledge.” Consistency across the land management agencies is needed to ensure standardized information is collected.

¹MMOU USDA. and ADF&G, June 29, 2004

Native knowledge. A way of knowing or understanding the world, including traditional ecological and social knowledge of the environment derived from multiple generations of indigenous peoples' interactions, observations, and experiences with their ecological systems. Native knowledge is place-based and culture-based knowledge in which people learn to live in and adapt to their own environment through interactions, observations, and experiences with their ecological system. This knowledge is generally not solely gained, developed by, or retained by individuals, but is rather accumulated over successive generations and is expressed through oral traditions, ceremonies, stories, dances, songs, art, and other means within a cultural context.

BLM meanwhile defines Indigenous Knowledge (IK) as:

(IK) means a body of observations, oral and written knowledge, practices, and beliefs developed by Tribes and Indigenous Peoples through interaction and experience with the environment. IK is applied to phenomena across biological, physical, social, cultural, and spiritual systems. IK can be developed over millennia, continues to develop, and includes understanding based on evidence acquired through direct contact with the environment and long-term experiences, as well as extensive observations, lessons, and skills passed from generation to generation. IK is developed by Indigenous Peoples including, but not limited to, Tribal Nations, American Indians, Alaska Natives, and Native Hawaiians.

Information. Please include the title of the guidance found at 67 FR 8451, rather than the federal register citation. *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies*, 67 FR 8452 (February 22, 2002) and *Improving Implementation of the Information Quality Act*, OMB Memorandum No. M-19-15 (April 24, 2019),

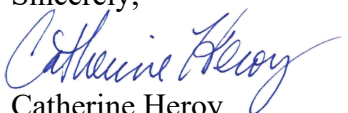
Under item 2. of the definition for “Information Quality”, please include the factors the Service will use in establishing information is objective (e.g., peer review, reproducibility, etc.). We also request a list of examples of the types of information the Service disseminates to the public as well as the type of information not covered by this directive.

We request the addition of the terms Quality Assurance and Quality Control and their definitions to ensure monitoring is carried out appropriately to achieve high-quality information.

Closing

Thank you for the opportunity to comment. Please contact me at (907) 269-0880 or by email at Catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,


Catherine Heroy
Federal Program Manager