



# Southeast Alaska Conservation Council

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Regional Forester Beth Pendleton  
Alaska Region, USFS  
PO Box 21628  
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May 11, 2011

Dear Regional Forester Pendleton:

I greatly appreciate you taking time to meet with me on February 4<sup>th</sup> to discuss the need to ensure that the Tongass Transition Framework is a durable plan. The Transition Framework represents an important new direction for this region, and the Southeast Alaska Conservation Council (SEACC) wants to continue working with the Forest Service in its transition. At this meeting we briefly discussed the need to support customary and traditional hunting and gathering on the Tongass, particularly by Native Alaskans who have subsisted off of these lands since time immemorial.

Although management of subsistence resources is a complicated and ever-evolving issue that will require continued work and reassessment, we believe that there are simple yet meaningful actions the Forest Service could take right now to refine its subsistence management policy. I am writing to ask you to take one such step, and to encourage and protect subsistence in the Tongass by eliminating unnecessary fees for subsistence use.

Several families in Yakutat own cabins on Tongass National Forest (TNF) land that they use solely for subsistence purposes. The Forest Service currently charges these subsistence users a large fee for a special use permit that allows them to continue to use their cabins – cabins that, in most cases, their families built and have used for these same subsistence purposes for decades. The Forest Service charges this same rate to those utilizing shelters on TNF land for commercial fishing camps, mineral exploration, commercial outfitter and guide operations, and personal recreation retreats. We believe that this policy is not only unfair, but inconsistent with both the spirit and letter of the Alaska National Interest Lands Conservation Act (ANILCA). I have attached a memo detailing our thoughts on this issue, and requesting that the special use fee charged to subsistence users be eliminated, or, at the very least, substantially reduced. The memo was produced by our legal fellow, and while detailed and specific, my intention is not to put legal pressure on the Forest Service, but to persuade the Forest Service that change is warranted.

As you have observed in numerous meetings, the customary and traditional use challenges in the TNF are substantial. While in appearance this issue may seem like a small one, taking the simple steps required to address it will send a clear message to the region that the Forest Service is serious about the effort to ensure that its management addresses the realities of community needs on the Tongass.

Sincerely,

Lindsey Ketchel  
Executive Director