



**Scoping Report**  
**for**  
**Northern Fur Seal Harvest Regulations**  
**Environmental Assessment**

**April 2012**





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## **List of Acronyms and Abbreviations**

APA	Administrative Procedures Act
EA	Environmental Assessment
E.O.	Executive Order
FR	Federal Register
CFR	Code of Federal Regulations
FSA	Fur Seal Act
MMPA	Marine Mammal Protection Act
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
Traditional Council	St. George Traditional Council

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## Introduction

This report reviews the comments received during the scoping period regarding proposed changes to the northern fur seal Harvest Regulations for St. George Island by the St. George Traditional Council (Traditional Council). The National Marine Fisheries Service (NMFS) received a petition from the Traditional Council in September 2006, proposing changes in harvest regulations to better provide for cultural and traditional practices. NMFS invited public comments on the petition through a Federal Register Notice on April 23, 2010 (75 FR 21233). NMFS is currently proceeding with preparation of an Environmental Assessment (EA), and sought public comments to help identify issues to be analyzed.

## Background

The subsistence harvest of northern fur seals in the Pribilof Islands is governed by regulations established under the Fur Seal Act (FSA) and the Marine Mammal Protection Act (MMPA), found at 50 CFR 216.71-74. These regulations, which were promulgated by an emergency final rule in 1986 (51 FR 24828, July 9, 1986), require NMFS to publish estimated harvest ranges for subsistence needs every three years, limit the harvest to sub-adult male fur seals, identify specific hauling grounds from which fur seals may be taken, and establish the period between June 23 and August 8 of each year, during which fur seals may be taken for subsistence purposes. The most recent 3-year harvest ranges are found at (73 FR 49616, August 22, 2008)

The Traditional Council submitted a request that NMFS change the regulations to allow a harvest that better meets their customary and traditional needs. NMFS considers this and subsequent reports submitted by the Traditional Council to be a formal petition for rulemaking under the Administrative Procedures Act (APA). The Traditional Council noted that the community was historically allowed to take fur seal young of the year in the fall for subsistence purposes; however, a harvest of fur seal young of the year is not included in the current regulations. Accordingly, the Traditional Council requested NMFS to modify its regulations to allow the harvest of 150 male northern fur seal young of the year, annually in order to meet the subsistence needs for the St. George Island Aleut community.

Harvest reports from the Traditional Council and harvest records from the NMFS indicated the need to change three provisions of the current subsistence harvest regulations. First, the current regulations allow harvest only from the Northeast and Zapadni hauling grounds. The Traditional Council reported in their 2008 and 2009 harvest reports that sufficient numbers of sub-adult males for the harvest are not always available at the Northeast and Zapadni hauling grounds, but are likely available on other sub-adult male hauling grounds. NMFS' harvest records corroborate the lack availability of sub-adult males when harvests are limited to two or fewer hauling grounds.

Second, the current regulations require the harvest to stop no later than August 8 of each year. The Traditional Council stated that traditional practices included the harvest of fur seal young of the year in the fall. Accordingly, the Traditional Council contends, a separate fall harvest season is most consistent with traditional practices and subsistence needs identified for St. George Island. Third, the current regulations at 50 CFR 216.74 describe data collection needs and other requirements to cooperate with scientists that the Traditional Council feels are no longer applicable, nor consistent with the E.O. 13175 Tribal Consultation, American Indian Native Policy of the U.S. Department of Commerce, or the co-management agreement signed by the Traditional Council and NMFS in 2001.

The NMFS proposes to change provisions in the regulations governing the subsistence harvest of northern fur seals on St. George Island. The proposed action would allow for the taking of northern fur seal male young of the year each fall, the subsistence sub-adult male harvest to be conducted at more haul-outs sites on St. George Island, and to eliminate any obsolete requirements regarding data collection. The purpose of the NMFS proposed action is to fulfill their federal trust responsibilities under the MMPA and FSA, by recognizing the nutritional and cultural needs of Alaskan Natives to the fullest extent possible, consistent with applicable laws, and to ensure that any aboriginal subsistence harvest of northern fur seals does not adversely affect the conservation of the Depleted Eastern Pacific Stock of northern fur seals.

## Scoping Methods Overview

As part of preparing an EA, NMFS circulated notices requesting public input on the proposed changes, and scheduled public meetings in St. George and Anchorage, Alaska.

Scoping is designed to be an open, public process for identifying the scope of physical, biological and social environmental issues related to the proposed project that should be addressed through the National Environmental Policy Act (NEPA). The scoping process provides people potentially affected by the project an opportunity to express their views and offer any suggestions they may have regarding the project. Scoping is typically accomplished through written correspondence, public scoping meetings, use of electronic media, and formal and informal consultation with agency officials, interested individuals, and groups.

The scoping process for changes to the northern fur seal subsistence harvest regulations used the following techniques for public notice:

- Newspaper advertisements announcing public meetings and comment period
- Online posting on NMFS website and community calendars announcing public meetings and comment period
- Announcements via email listservs announcing public meetings and comment period
- Personal phone calls to stakeholders
- Public scoping meetings held on St. George Island and in Anchorage, AK
- NMFS mailing address, fax number, and email address for comments ([furseal@noaa.gov](mailto:furseal@noaa.gov))

## Summary of Comments Received

Scoping comment submissions were received via a public scoping meeting, US mail, and email. The majority of comments received were from discussions during the St. George public meeting on May 27, 2011, in which 14 people attended. No comments were received at the Anchorage public meeting on May 24, 2011, where only one person attended. Two letters were received from the Aleutian Pribilof Islands Association and Mr. Larry Mercurief of Seven Generations Consulting. **Table 1** provides a summary of the comments.

Public comments included several detailed remarks emphasizing the cultural and historic context of the requested changes. In the St. George meeting and in both letters it was urged that the EA clarify the background and context for the request.

**Table 1: Summary of Public Comments**

Topic	Sub-topic	St. George Meeting (5/17/2011)	APIA letter	Larry Merculief
1. Proposed Action	1.1 Cultural Context	Provide context that proposed action is consistent with St. George Aleut cultural practices; not unlike other cultural practices of harvest young animals (e.g.: cattle and pork).	Proposed action “secures centuries of cultural practices and supports traditional and customary uses.”	Provide context that “archeological evidence demonstrates unequivocally that Aleut people have always taken and eaten fur seals of all ages, including pups for thousands of years.” “...[t]he current situation criminalizes something that was traditional and occurred over thousands of years.”
	1.2 Historical Context	Provide context that proposal is a reaffirmation of historic practices. St. George Aleut agreed to limit pup harvest in late 19 <sup>th</sup> century to promote recovery. However, this hunt was not reauthorized when the population recovered.		Provide context that “only with introduction of U.S. management that Aleut people were precluded from fully engaging in their traditional subsistence practices.”
	1.3 Harvest limited to male pups	St. George Aleut propose a male only pup harvest, recognizing conservation needs.		
	1.4 Previous Federal Register Notice	St. George Aleut petition was subject of FR notice, but no comments received, an indicator of low public controversy.		
2. Alternatives	2.1 Alt. 4 – allowing harvest of male and female pups	St. George Aleut did not propose Alt. 4; don’t seek to take female pups.		
3. Biological Environment	3.1 Northern Fur Seal population status and trends	Describe the current population level, and trend of slight decline. Analyze whether proposed changes in harvest regulations would have an adverse population impact.		“Taking of 150 seal pups is statistically insignificant in terms of [e]ffect on the overall health of the stock... no scientific basis to prevent such a harvest.”
	3.2 Northern Fur Seal distribution	Describe northern fur seal range, and status of population throughout the range.		
4. Social Environment	4.1 Handicraft uses	Describe regulatory framework and current status of northern fur seal handicraft production.		
	4.2 Public concerns and humane taking	Examine humane taking practices and potential for public controversy.		

NATIONAL MARINE FISHERIES SERVICE  
 NORTHERN FUR SEAL SUBSISTENCE HARVEST REGULATIONS  
 SCOPING REPORT

Topic	Sub-topic	St. George Meeting (5/17/2011)	APIA letter	Larry Merculief
	4.3 Tribal government leadership and Co-Management	Describe Tribal government efforts and Co-Management Council leadership in northern fur seal conservation and harvest management.	“future of northern fur seals relies on Pribilof Aleuts’ continued stewardship.... earnest and proactive stewardship.”	
	4.4 Government to Government relationship		Provide context on NMFS Government to Government and Co-Management undertakings.	
5. Cumulative Effects	5.1 Trawl fishery impacts on Northern Fur Seals	Analyze impacts of trawl fisheries on northern fur seals, including by-catch mortality and prey species removal.		
	5.2 Trawl fishery impacts on subsistence halibut fishery	Analyze impacts of trawl fishery on other subsistence harvest, including halibut.		
	5.3 Climate change effects	Analyze impacts of climate change on Bering Sea ecology, potential effects on northern fur seals.		
6. Implementation	Involvement of the Co-Management Council	Clarify role of the Co-Management Council in implementing any changes in harvest regulations.		



Comments asked that the EA clarify the origin of alternatives to be analyzed in the EA. Specifically, an alternative which would permit harvest of females is included because it shows the contrasting biological impacts of harvest of males only, versus a mixed male and female take. However, this alternative was not requested by the Traditional Council.

In regard to potential biological impacts, the comments requested that the EA document the Northern fur seal population status and trends be examined closely, including the status throughout the range. The EA should then analyze the potential impacts of the proposed harvest regulations on the population.

In regard to social impacts, the comments suggested that production of Northern Fur Seal handicrafts should be described, and that current measures and potential for public controversy over humane taking of Northern Fur Seals should be described. Several comments emphasized that the EA should document the context of Tribal leadership and the role of the Co-management Council in Northern fur seal conservation and subsistence harvest management.

Cumulative impacts were noted in several comments. Specifically, the EA should analyze the impacts of trawl fisheries on northern fur seals and other subsistence species and harvests. The potential for effects from climate change should also be reviewed in the EA.

Comments in St. George noted that implementation of the revised subsistence harvest regulations should involve the Co-Management Council. The EA should clarify the role of the Co-Management Council in implementation of revised subsistence harvest regulations.

## **Conclusion and Next Steps**

NMFS has solicited comments on the proposed changes in northern fur seal subsistence harvest regulations on St. George on two occasions. These include the Federal Register notice in April 2010, and the current scoping effort. The agency now has information from the public regarding the issues and concerns to be addressed in the EA.

NMFS will proceed to develop the EA, addressing the issues and concerns raised in scoping. Under the planned schedule, the EA is to be released and additional public review available in September 2011, followed by a decision by NMFS in October 2011. Next, NMFS will publish a Proposed Rule specifying the new harvest regulations in November 2011. The public comment period on the Proposed Rule would conclude 60 days later in January 2012, and any new regulations would enter into effect in time for the spring 2012 subsistence harvest of northern fur seals on St. George Island.

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## **Appendix A - Scoping Outreach Materials**

Newspaper Advertisements

Online Advertisements

Listserv Distributions

List of Stakeholders Contacted

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# Anchorage Daily News Affidavit of Publication

1001 Northway Drive, Anchorage, AK 99508

AD #	DATE	PO	ACCOUNT	PRICE PER DAY	OTHER CHARGES	OTHER CHARGES #2	OTHER CHARGES #3	GRAND TOTAL
891701	05/22/2011	26220902	URSC0705	\$132.80				
	05/23/2011	26220902	URSC0705	\$132.80				
				\$265.60	\$0.00	\$0.00	\$0.00	\$265.60

## STATE OF ALASKA THIRD JUDICIAL DISTRICT

Shane Drew, being first duly sworn on oath deposes and says that he is an advertising representative of the Anchorage Daily News, a daily newspaper.

That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on the above dates and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed Shane Drew

Subscribed and sworn to me before this date:

5/25/11

Notary Public in and for the State of Alaska.  
Third Division. Anchorage, Alaska

MY COMMISSION EXPIRES: 12/12/13

Cynthia A. Grove



The National Marine Fisheries Service (NMFS) invites the public to a meeting to discuss requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island.

The Aleut Community of St. George Island, Traditional Council petitioned the NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually. NMFS is currently reviewing alternatives and seeks public comments on this request.

The public meeting provides an opportunity to make comments to be used in developing an Environmental Assessment. Please visit the National Marine Fisheries Service website for more information:  
<http://www.fakr.noaa.gov/protectedresources/seals/fur.htm>

Anchorage Tuesday, May 24, 2011 5:30pm,  
Anchorage Marriott Downtown

Meeting facilities are Americans with Disabilities Act compliant. We are able to offer, upon request, reasonable accommodations for special needs related to other disabilities.

Public comments may be submitted through June 24, 2011 by e-mail to: [furseal@noaa.gov](mailto:furseal@noaa.gov), by postal service to: Kaja Brix, Assistant Regional Administrator, Protected Resources Division, Alaska Region, NMFS, P.O. Box 21668, Juneau, AK 99802, by fax to: 907-586-7557, or hand delivery to the Federal Building: 709 West 9th Street, Room 420A, Juneau, AK.

Published: May 22 & 23, 2011

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Newspaper ID #891701

The National Marine Fisheries Service (NMFS) invites the public to a meeting to discuss requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island. The Aleut Community of St. George Island, Traditional Council petitioned the NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually. NMFS is currently reviewing alternatives and seeks public comments on this request. The public meeting provides an opportunity to make comments to be used in developing an Environmental Assessment. Please visit the National Marine Fisheries Service website for more information:

<http://www.fakr.noaa.gov/protectedresources/seals/fur.htm>. Anchorage Tuesday, May 24, 2011 5:30pm, Anchorage Marriott Downtown Meeting facilities are Americans with Disabilities Act compliant. We are able to offer, upon request, reasonable accommodations for special needs related to other disabilities. Public comments may be submitted through June 24, 2011 by e-mail to: [furseal@noaa.gov](mailto:furseal@noaa.gov), by postal service to: Kaja Brix, Assistant Regional Administrator, Protected Resources Division, Alaska Region, NMFS, P.O. Box 21668, Juneau, AK 99802, by fax to: 907-586-7557, or hand delivery to the Federal Building: 709 West 9th Street, Room 420A, Juneau, AK. Published: May 22 & 23, 2011

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## National Oceanic and Atmospheric Administration

### National Marine Fisheries Service, Alaska Regional Office

#### Northern Fur Seals

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#### NORTHERN FUR SEALS IN ALASKA

##### Quick Links:

[Conservation Plan](#) | [Petition](#) | [Co-Management](#) | [Subsistence Harvest](#) | [Analyses](#) | [Research](#)

#### Conservation Plan

[Conservation plan for the Eastern Pacific stock of northern fur seal](#), December 2007

[72 FR 73766, December 28, 2007](#). Notice of Availability of Final Eastern Pacific Northern Fur Seal Stock Conservation Plan

##### Related Documents

[Draft Conservation Plan for the Eastern Pacific Stock of Northern Fur Seal \(\*Callorhinus ursinus\*\)](#), May 2006

[71 FR 32306, June 5, 2006](#). Notice of Availability for the Draft Conservation Plan. Comment period through August 4, 2006.

[Conservation Plan for the Northern Fur Seal](#), 1993 (11 MB)

[53 FR 17888, May 18, 1988](#). Final rule designating the Pribilof Island population of North Pacific fur seals as depleted under the MMPA.

#### Management Analyses

[Biological Opinion on Activities Authorized on Steller Sea Lions and Northern Fur Seals](#), June 2007

[Final Programmatic EIS for Steller Sea Lion and Northern Fur Seal Research](#), May 2007

[Final Environmental Impact Statement](#) - Setting the Annual Subsistence Harvest of Northern Fur Seals on the Pribilof Islands, May 2005

[Draft Environmental Impact Statement](#) for the Pribilof Islands Annual Subsistence Harvest of Northern Fur Seals to determine and publish the Take Ranges, August 2004

[69 FR 53915, September 3, 2004](#). Notice of Availability of the Draft EIS.

[68 FR 36539, June 18, 2003](#). Notice of Intent to analyze the effects of the subsistence taking of northern fur seals on the Pribilof Islands.

#### Petition

Notice of a public meeting May 24, 2011 at the Anchorage Marriott about the requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island. The Aleut Community of St. George Island, Traditional Council petitioned the NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually. NMFS is reviewing alternatives and sought public comments on this request through June 24, 2011.

[75 FR 21233, April 23, 2010](#). Notice of a petition from the Pribilof Island Community of St. George Island, Traditional Council to revise regulations governing the subsistence taking of northern fur seals to allow residents of St. George Island to take male fur seal young of the year during the fall. Public comment period through June 22, 2010.

#### Co-Management

##### Agreements

[Agreement](#) Between the Aleut Community of St. George Island and NMFS, 2001

[Agreement](#) Between the Aleut Community of St. Paul Island and NMFS, 2000

##### Subsistence Harvest of Northern Fur Seals - Reports

St. George Island: [2010](#), [2009](#), [2008](#), [2007](#), [2006](#)

## datebook49

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### NMFS Public Meeting

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**WHEN** Tuesday, May 24, 2011, 5:30 – 7pm

**WHERE** Anchorage Marriott Downtown

**EVENT TYPE** Community

**PRICE - LOW** \$0

**PRICE - HIGH** \$0

**CONTACT** 907-261-9737

**NOTE** The National Marine Fisheries Service (NMFS) invites the public to meetings to discuss requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island.

The Aleut Community of St. George Island, Traditional Council petitioned the NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually.

NMFS is currently reviewing alternatives and seeks public comments on this request.

The public meetings provide an opportunity to make comments to be used in developing an Environmental Assessment.

Please visit the National Marine Fisheries Service website for more information:

[www.fakr.noaa.gov...](http://www.fakr.noaa.gov...)

Public comments may be submitted through June 24, 2011 by e-mail to: [furseal@noaa.gov](mailto:furseal@noaa.gov), by postal service to: Kaja Brix, Assistant Regional Administrator, Protected Resources Division, Alaska Region, NMFS, P.O. Box 21668, Juneau, AK 99802, by fax to: 907-586-7557, or hand delivery to the Federal Building: 709 West 9th Street, Room 420A, Juneau, AK.

**LINK** [www.fakr.noaa.gov...](http://www.fakr.noaa.gov...)

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Erin Green <erinaloha@gmail.com>

05/11/2011 01:54 PM

To erin\_green <erin\_green@urscorp.com>

cc

bcc

Subject Fwd: [whatsup] What's Up 5/11/11 - Email Version

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From: <[pegt@gci.net](mailto:pegt@gci.net)>

Date: Tue, May 10, 2011 at 9:15 PM

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To: [whatsup@npogroups.org](mailto:whatsup@npogroups.org)

**\*\*Mark items that are new in this issue.**

May 11, 2011

Compiled Weekly by Peg Tileston

On behalf of the Alaska Women's Environmental Network (AWEN), Alaska Center for the Environment (ACE), and Alaska Conservation Alliance (ACA)

## WORKSHOPS, SEMINARS, TRAINING, WEBINARS, WEBCASTS, STATEWIDE EVENTS & TELECONFERENCES

### **\*\*May 13 (TELECONFERENCE)**

Public meeting of the ALASKA BOARDS OF FISHERIES and GAME (Joint Boards) will be held at 2pm. The purpose of the meeting is to review requests for removal for cause of two members of the local fish and game Anchorage Advisory Committee and one member of Juneau Advisory Committee to determine if further hearings should be scheduled. The board will not take oral public testimony during the teleconference. Listen-only teleconference sites will be provided to the public in Anchorage and Juneau at the following locations: Anchorage Legislative Information Office (LIO), 716 West 4th Avenue; and Juneau Department of Fish and Game Office, 1255 West 8th Avenue (Commissioner's Conference Room). A live audio stream of the meeting is intended to be available on the Joint Boards website which can be accessed at: [www.boards.adfg.state.ak.us](http://www.boards.adfg.state.ak.us). Meeting materials will also be posted on this website or through the Department of Fish and Game Boards Support Section. For information about the meeting or meeting materials, contact the Boards Support Section at [\(907\) 465-4110](tel:9074654110).

May 14

TOK - 10th ANNUAL UPPER TANANA VALLEY MIGRATORY BIRD FESTIVAL will be held from 7:30am to 2pm at the Tetlin National Wildlife Refuge. This year's theme focuses on involving youth and adults in learning about birds, birdwatching, and bird conservation. The day begins at the Refuge Headquarters with refuge staff conducting a morning family bird watching trip followed by a bird banding demonstration. Starting at 10am at the Tok Mainstreet Visitor

degree in Regenerative Entrepreneurship with Gaia University and is leading the expansion into edible garden services for Red Edge Design. She is a certified Permaculture designer and teacher, and has worked with Matt for the past three years to transform their small house into an abundant urban homestead. For more information, contact REAP at [907.929.7770](tel:907.929.7770)..

**\*\*May 18 -21**

HEALING THE SPIRIT FROM THE LIGHT WITHIN will be held in the Dena'ina Center in honor of Yup'ik Grandmother Rita Pitka Blumenstein. This is the 9th International Council of Thirteen Indigenous Grandmothers. To register or for more information, go to [www.13grandmothersalaska.org](http://www.13grandmothersalaska.org) or call [907-717-9611](tel:907-717-9611) or email [13grandmothersalaska@gmail.com](mailto:13grandmothersalaska@gmail.com).

**May 21**

The Society of American Foresters - Cook Inlet Chapter will hold its ANNUAL ARBOR DAY TREE SEEDLING SALE starting at 9am in the parking lot near R.E.I.'s front entrance at W. Northern Lights Blvd and Spenard Road. Seedlings are available in bundles of 20, approximately 8 inches tall (for most species), and shrink-wrapped in plastic. Cost is \$20 per bundle. Species available are: lodgepole pine, Siberian larch, Colorado blue spruce, paper birch and white spruce. Pre-order seedlings using the form at: [http://www.aksaf.org/pdfs/CI\\_2011\\_ArborDay\\_Order\\_Form.pdf](http://www.aksaf.org/pdfs/CI_2011_ArborDay_Order_Form.pdf). Pre-paid orders will be available the morning of the Public Tree Seedling Sale at R.E.I.

**\*\*May 24**

ANCHORAGE – A public meeting will be held from 5:30. to 7pm at the Anchorage Marriott Downtown regarding the NORTHERN FUR SEAL HARVEST REGULATIONS. The National Marine Fisheries Service (NMFS) invites the public to meetings discussing the requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island. The Aleut Community of St. George Island, Traditional Council petitioned the NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually. NMFS is currently reviewing alternatives and seeks public comments on this request. Please visit the NMFS website for more information: <http://www.fakr.noaa.gov/protectedresources/seals/fur.htm>. Public comments may be submitted through June 24 by email to: [furseal@noaa.gov](mailto:furseal@noaa.gov), or fax to [907-586-7557](tel:907-586-7557).

## MEETINGS & EVENTS OUT OF ANCHORAGE

**\*\*May 11**

STERLING - Public open house will be held from 4:30 to 6:30 at the Sterling Senior Center to discuss the STERLING HIGHWAY RESURFACING PROJECT - FOREST LANE to GRANDVIEW DRIVE. Work will include repaving, new signage and striping. This project is expected to be complete by July 31, 2011. Project teams will be available to review the project scope and answer questions. Work is expected to begin the week of May 9. For more information, call DOT at 260-4155, Alaska RoadBuilders at 292-9140 or visit <http://alaskanavigator.org>.

**\*\*May 16**

KODIAK - ALASKA STATE PARKS CITIZEN'S ADVISORY BOARD will meet at 7pm at the Fort Abercrombie Park Office. All are welcome to attend. A copy of the agenda can be obtained by contacting the Kodiak District office at [907-486-6339](tel:907-486-6339).

May 12

FAIRBANKS - The documentary, SOURCE OF LIFE, a short film on the life of CLAIRE FEJES, filmed for PBS will be shown at 7pm at Noel Wien Library. The film tells the story of an artist inspired by the traditions and cultures of Alaska's first people. Traces an artists life from Depression-era Brooklyn to Fairbanks, Alaska and her extended visits to Alaska's whaling camps and villages. Question and Answers to follow.

May 12

FAIRBANKS - CREAMER'S FIELD GUIDED BIRDATHON WALK will be held at 7pm with SHERRY LEWIS. Meet at the Farmhouse Visitor Center. \$10/person.

May 14

HOMER - The CENTER FOR ALASKAN COASTAL STUDIES will hold their SPRING FLING 2011 at the Homestead Restaurant at 6pm. The Center has been connecting folks to the nature of Alaska since 1982 Nothing can replace a personal hands-on experience that sparks respect and care for our world. Purchase tickets online at [http://www.akcoastalstudies.org/online-store-support-our-organization.html?page=shop.browse&category\\_id=2](http://www.akcoastalstudies.org/online-store-support-our-organization.html?page=shop.browse&category_id=2) or call [907 235-6746](tel:907-235-6746). Tickets are \$75.

**\*\*May 16**

ST. GEORGE ISLAND- A public meeting will be held from 6 to 7:30pm at the St. George School regarding THE NORTHERN FUR SEAL HARVEST REGULATIONS. The National Marine Fisheries Service (NMFS) invites the public to meetings discussing the requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island. The Aleut Community of St. George Island, Traditional Council petitioned the NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually. NMFS is currently reviewing alternatives and seeks public comments on this request. Please visit the NMFS website for more information: <http://www.fakr.noaa.gov/protectedresources/seals/fur.htm>. Public comments may be submitted through June 24, 2011 by e-mail to: [furseal@noaa.gov](mailto:furseal@noaa.gov), by postal service to: Kaja Brix, Assistant Regional Administrator, Protected Resources Division, Alaska Region, NMFS, P.O. Box 21668, Juneau, AK 99802, by fax to: [907-586-7557](tel:907-586-7557), or hand delivery to the Federal Building: 709 West 9th Street, Room 420A, Juneau, AK.

May 16

WILLOW - Public hearing will be held from 6 to 8pm at the Willow Community Center to take comments on the proposed ALASKA GASLINE DEVELOPMENT CORPORATION RIGHT-OF-WAY LEASE APPLICATION. The Alaska Gasline Development Corporation has applied for a right-of-way lease proposing to build a 24" natural gas and natural gas liquids pipeline that will originate in Prudhoe Bay and follow the Trans Alaska Pipeline System (TAPS) and Dalton Highway corridors, generally paralleling the highway corridor from the North Slope to near Livengood, northwest of Fairbanks. At Livengood, the pipeline route heads south, joining

**Please note: WEBINARS, WEBCASTS and TELECONFERENCE section is now a separate section.**

**\*\*Mark items that are new in this issue.**

**June 2, 2011**

Compiled Weekly by Peg Tileston

On behalf of the Alaska Women's Environmental Network (AWEN), Alaska Center for the Environment (ACE), and Alaska Conservation Alliance (ACA)

## **CONFERENCES, WORKSHOPS, SEMINARS, TRAINING,**

[mailto:heather\\_n\\_johnson@fws.gov](mailto:heather_n_johnson@fws.gov)

**June 6 - 17**

**FAIRBANKS - ALASKA BIOGEOGRAPHY: PLANTS, POLLINATORS, AND IMPOSTERS** will be held at the UAF Main Campus, ED F595P 3 Credits. Explore the dynamic relationship between Alaskan plants and pollinators, and help unravel the mystery of how invasive plants might impact both. This two part UAF Summer Sessions course will begin with a week of ecology background (available through distance delivery), and finish with a week of science field work and hands-on learning in residency on the UAF campus. Participants will gain biology research experience alongside UAF scientists, and gain tools necessary to engage students on the course material. Participants and instructors will collaborate to develop teaching modules on the course topic for use in classrooms throughout the state. Teachers grades 7-12. Travel stipends available if needed. To register go to <http://www.uaf.edu/summer/>. For more information contact [katie.spellman@alaska.edu](mailto:katie.spellman@alaska.edu).

**June 7 - 9**

**DENALI NATIONAL PARK – TEACHER TRAINING - IMOVIE: MOVIE MAKING AND PODCASTING IN DENALI** will be offered by Alaska Geographic through the Murie Science and Learning Center. Join Denali Borough School District's Technology Director **CHRIS ROMINE** to learn about iMovie and its use in the classroom for creating educational and rewarding stories. YouTube, TeacherTube, and other video sharing sites are being used in educational settings to convey compelling digital stories to the public. iMovie is a user friendly program that can provide a unique creative tool for enhancing learning and creativity by engaging students. We will discover how iMovie can help students demonstrate abstract concepts, tackle project-based learning, and create documentaries. Teachers will create iMovie projects during the training. Participants will stay at a field camp located 29 miles inside Denali National Park along the Teklanika River. The Field Camp includes rustic tent cabins and a common dining tent. All meals, accommodations, transportation, instruction, and one professional development credit from UAA are included in the \$350 course fee. For more information or to register, go to [www.alaskageographic.org](http://www.alaskageographic.org), email [courses@murieslc.org](mailto:courses@murieslc.org), or call 907-683-1269

**June 8**

**ANCHORAGE - COMPOST & SOIL AT C STREET COMMUNITY GARDEN WORKSHOP** Will be held from 7 to 9pm at the C Street Community Garden. Don't forget about the soil! It's full of microbes, worms and nutrients necessary for excellent plant growth. How do you get a great soil? You add compost, for one thing. And you know what to look for in the soil. This workshop will be held at the C Street Community garden. We will prepare a compost pile and work with the soil to learn what to look for and how to improve the soil in your garden. For more registration go to <http://akcenter.org/sustainable-communities/local-food/gardening/2011-garden-workshop-registration>. Cost: \$25 includes all materials. For more information, contact Samarys with Alaska Community Action on Toxics at 222-7714 or email [samarys@akaction.org](mailto:samarys@akaction.org).

The request for a hearing should be sent to Daniel S. Sullivan, Commissioner, Department of Natural Resources, by fax to 907.269.8918 or emailed to [dnr.appeals@alaska.gov](mailto:dnr.appeals@alaska.gov).

**\*\*June 24**

Deadline for comments regarding the requested changes to the **NORTHERN FUR SEAL HARVEST REGULATIONS** that govern the subsistence harvest of northern fur seals on St. George Island. The

## **EVENTS & MEETINGS \ANCHORAGE - EAGLE RIVER & GIRDWOOD**

### **EVERY SATURDAY IN JUNE**

**POTTER MARSH BIRD WALK** will be held from 8 to 10 am. Come join us for a guided leisurely walk on the Potter Marsh boardwalk to identify and learn about the area's wildlife. This family-friendly event is for the beginning birder as well as those that know their way around a bird's wing. Binoculars are available for loan (no charge) and spotting scopes and guide books will also be available. Walks will take place rain-or-shine, so dress accordingly. Meet your guide at the boardwalk entrance kiosk at Potter Marsh. Kids encouraged, wheelchair accessible. Sponsored by the Alaska Department of Fish & Game. For more information, contact Joe Meehan at 90-267-2281 or email [joe.meehan@alaska.gov](mailto:joe.meehan@alaska.gov) or go to [www.adfg.alaska.gov](http://www.adfg.alaska.gov).

### **June 4**

#### **MOMS, POPS, AND TOTS AT THE CAMPBELL CREEK SCIENCE CENTER, 5600**

Science Center Drive. Outside play in nature is critical for children's healthy development. Spend time with us from 2 to 4 pm playing outside and exploring the natural world with your infant or toddler and their siblings. Network with other parents. Learn about outdoor gear and leave with useful handouts! We all begin together on our gentle adventures exploring areas around the Science Center. Bathrooms and changing stations available. Flexible ending time allows families to stay for the full two hours or leave when the enthusiasm wanes. Event is free. Located at the Campbell Creek Science Center, Call 267-1241 for more information. Pre-registration is appreciated. Contact Brian Lax, Science Instructor, at (907) 267-1236, Fax (907) 267-1258 or email [blax@blm.gov](mailto:blax@blm.gov) or go to [www.blm.gov/ak/st/en/prog/sciencecenter.html](http://www.blm.gov/ak/st/en/prog/sciencecenter.html).

### **June 4**

Celebrate **NATIONAL TRAILS DAY** by volunteering for a trail safety brushing project the focuses on improving sight lines, increasing off trail visibility into densely wooded areas, and creating defensible space against fire at the Chester Creek Trail from the East Northern Lights Electric Sub Station to the foot bridge crossing to East HS.

### **June 6**

**GIRDWOOD** - Public hearing will be held at the Planning & Zoning Commission at 6:30pm on the proposal for a conditional use to allow **TOWNHOMES AT DENSITY GREATER THAN EIGHT (8) PER ACRE** on Alyeska North #3 Subdivision located east of Taos Road and north of Crystal Mountain Road. For more information, contact Marco Zaccaro at Day Phone: 907 783-1090, Fax 9077831095 or email [marco@zarch-ak.com](mailto:marco@zarch-ak.com).

### **June 6**

**Please note: WEBINARS, WEBCASTS and TELECONFERENCE section is now a separate section.**

**\*\*Mark items that are new in this issue.**

**June 7, 2011**

Compiled Weekly by Peg Tileston

On behalf of the Alaska Women's Environmental Network (AWEN), Alaska Center for the Environment (ACE), and Alaska Conservation Alliance (ACA)

## **CONFERENCES, WORKSHOPS, SEMINARS, TRAINING,**

[mailto:heather\\_n\\_johnson@fws.gov](mailto:heather_n_johnson@fws.gov)

**June 8**

### **ANCHORAGE - COMPOST & SOIL AT C STREET COMMUNITY GARDEN WORKSHOP**

Will be held from 7 to 9pm at the C Street Community Garden. Don't forget about the soil! It's full of microbes, worms and nutrients necessary for excellent plant growth. How do you get a great soil? You add compost, for one thing. And you know what to look for in the soil. This workshop will be held at the C Street Community garden. We will prepare a compost pile and work with the soil to learn what to look for and how to improve the soil in your garden. For more registration go to

<http://akcenter.org/sustainable-communities/local-food/gardening/2011-garden-workshop-registration>.

Cost: \$25 includes all materials. For more information, contact Samarys with Alaska Community Action on Toxics at 222-7714 or email [samarys@akaction.org](mailto:samarys@akaction.org).

**June 13**

**THE EVOLUTION OF TELECOMMUNICATIONS IN ALASKA: FROM BUSH TELEPHONES TO BROADBAND** will be held from 8:30am to 5pm in the UAA/APU Consortium Library. Learn from key people who helped bring telecommunication to rural Alaska from their first-hand accounts about:

How telephone service first came to Alaska; What NASA satellite experiments meant for Alaska; How Alaska became a telemedicine and distance education pioneer; How all villages got phones and TV service; How the Internet came to rural Alaska; and What lessons we've learned for Alaska's broadband future. This event is free and open to the public. Lunch will be provided. If you plan to join us for lunch, please RSVP to [ISER50@uaa.alaska.edu](mailto:ISER50@uaa.alaska.edu). More information and a final agenda will be posted on ISER's website at [www.iser.uaa.alaska.edu](http://www.iser.uaa.alaska.edu)

**June 17 - 19**

**DENALI NATIONAL PARK - FAMILY FIELD COURSE - DENALI WILDFLOWERS** will be offered by Alaska Geographic through the Murie Science and Learning Center. June brings a rainbow of colors to Denali's landscape. Bring your children and discover the beautiful world of Denali's wildflowers. Through hiking and exploration, we'll learn about what grows where and why, and how these plants survive in the subarctic ecosystem. This course will include active learning, floral arts and crafts, and stops to smell the tundra roses! This seminar is specifically designed for families with children 8 years and younger. Participants will stay at a field camp located 29 miles inside Denali National Park along the Teklanika River. The Field Camp includes rustic tent cabins and a common dining tent. All meals, accommodations, transportation, and instruction are included in the \$235 course fee. Professional development credit is available through UAA. For more information or to register, go to [www.alaskageographic.org](http://www.alaskageographic.org), email [courses@murieslc.org](mailto:courses@murieslc.org), or call 907-683-1269.

**June 22 - August 12**

**HOMER - The KACHEMAK BAY RESEARCH RESERVE'S SUMMER EDUCATION**

**PROGRAMS** begin on June 21st and runs through Friday, August 12th. These free programs are offered



Comments are due on **ALASKA'S 2012 ANNUAL AMBIENT AIR MONITORING NETWORK PLAN**. The Plan explains the monitoring objectives and a description of all current ADEC network monitoring sites. The document is available at <http://www.dec.state.ak.us/air/am/index.htm>, and is submitted to fulfill the annual network review requirement. For more information or to submit comments, contact Bob Morgan (907) 269-3070 or email [Bob.morgan@alaska.gov](mailto:Bob.morgan@alaska.gov) or Barbara Trost at (907) 269-6249 or email [Barbara.trost@alaska.gov](mailto:Barbara.trost@alaska.gov) or Fax (907) 269-7508.

#### June 24

#### **\*\*June 24**

**KOTZEBUE** - Comments are due on the proposal to **RENEWAL of an OIL DISCHARGE PREVENTION and CONTINGENCY PLAN**, for the **KOTZEBUE ELECTRIC ASSOCIATION INC.** The tank farm has a capacity of 2,149,980 gallons, and is located in Kotzebue, Alaska. The petroleum product on site is ULSD. For more information or to submit comments, contact Dept. of Environmental Conservation, Div. of Spill Prevention & Response, Terminals & Tank Farms Section, 610 University Avenue, Fairbanks, AK 99709, or call (907) 451-5960.

## **EVENTS & MEETINGS \ANCHORAGE - EAGLE RIVER & GIRDWOOD**

### **EVERY SATURDAY IN JUNE**

**POTTER MARSH BIRD WALK** will be held from 8 to 10 am. Come join us for a guided leisurely walk on the Potter Marsh boardwalk to identify and learn about the area's wildlife. This family-friendly event is for the beginning birder as well as those that know their way around a bird's wing. Binoculars are available for loan (no charge) and spotting scopes and guide books will also be available. Walks will take place rain-or-shine, so dress accordingly. Meet your guide at the boardwalk entrance kiosk at Potter Marsh. Kids encouraged, wheelchair accessible. Sponsored by the Alaska Department of Fish & Game. For more information, contact Joe Meehan at 907-267-2281 or email [joe.meehan@alaska.gov](mailto:joe.meehan@alaska.gov) or go to [www.adfg.alaska.gov](http://www.adfg.alaska.gov).

### **June 7, 8, 9, & 14**

Open House Meetings will be held at the following locations for review and comments on the **DRAFT CHUGACH STATE PARK MANAGEMENT PLAN**.

**June 7 - INDIAN** from 6:30 to 8:30pm in the Indian Valley Bible Chalet's Fellowship Hall

**June 8 - ANCHORAGE** from Noon to 2pm in Room 240, Atwood State Office Building

**June 9 - ANCHORAGE** - from 6:30 to 8:30pm in the Campbell Creek Science Center Multipurpose Room

**June 14 - EAGLE RIVER** from 6:30 to 8:30pm in the Eagle River Town Center Community Room, 12001 Business Blvd. #170

This plan provides the overall management and facility development direction for the park. The previous management plan, adopted in 1980, was outdated and needed revision to recognize facilities that have been built, improved or modified in the last 31 years, to accommodate proposed future facility development, and to address some of the issues the area is facing with increased visitor use. The plan is available at <http://dnr.alaska.gov/parks/units/chugach/planning.htm>. For more information or to submit

**\*\*Mark items that are new in this issue.**

**June 15, 2011**

Compiled Weekly by Peg Tileston

On behalf of the Alaska Women's Environmental Network (AWEN), Alaska Center for the Environment (ACE), and Alaska Conservation Alliance (ACA)

## **CONFERENCES, WORKSHOPS, SEMINARS, TRAINING,**

[mailto:heather\\_n\\_johnson@fws.gov](mailto:heather_n_johnson@fws.gov)

**\*\*June 24 - 26**

**NOME - WIND ENERGY COURSE** - Learn how wind turbines can put wind energy to work for you in this FREE class brought to Nome by Renewable Energy Alaska Project (REAP) and Alaska Center for Energy and Power. Funding is available for airfares (not lodging, though) for participants 18 and over from area communities to travel to Nome for the course (there is a brief application form to complete for travel assistance). Call 443-8403 to register and for more info! **Deadline is June 21.**

**June 22 - August 12**

### **HOMER - The KACHEMAK BAY RESEARCH RESERVE'S SUMMER EDUCATION**

**PROGRAMS** begin on June 21st and runs through Friday, August 12th. These free programs are offered for people all ages: Estuary Walks starting at the AK Islands & Ocean Visitor Center (Tuesdays and Thursdays from 1 – 2 pm), Beach Walks at Bishops Beach (Fridays from 11am – 12pm, with community partners also leading Beach Walks on Wednesdays and Saturdays at the same time and location), and Discovery Labs in the AK Islands & Ocean Visitor Center's lab classroom (Wednesdays, Fridays, and Saturdays from 1 – 3 pm, with topics changing weekly). There is no registration required. For more information, contact Carmen Field at 226-4659 or [carmen.field@alaska.gov](mailto:carmen.field@alaska.gov).

**\*\*June 28**

### **ANCHORAGE - LIGHTING TECHNOLOGIES: NOW AND IN THE FUTURE WORKSHOP**

will be held from 8:30am to 4pm in CFL4REI Education Room, 1200 W. Northern Lights Blvd. Chugach Electric Smart Power and Green Star present the seminar featuring **JEFF ROBBINS**, commercial lighting specialist with Seattle's Lighting Design Lab. The workshop begins with a review of lighting basics and finishes with in-class lighting application exercises. Robbins will cover all the recent updates to the newest and hottest technologies, followed by a thorough study of current retrofit practices. Continental breakfast, catered lunch, and light snacks provided. Call 278-7827 or email [info@greenstarinc.org](mailto:info@greenstarinc.org) to register. Registration is \$45 and space limited to 50 people so register early. These lighting workshops always fill up! Visit [www.greenstarinc.org](http://www.greenstarinc.org) for more details about the workshop.

**July 1-3**

**DENALI NATIONAL PARK - FAMILY FIELD COURSE - DENALI DINOSAURS** will be offered by Alaska Geographic through the Murie Science and Learning Center. Dinosaurs once roamed Denali's landscape! Join us on this family exploration into Denali's prehistoric past. By investigating the geologic history, we'll be learning about the plants, animals and climate of this area as it might have looked 65 million years ago. Perhaps we'll even find a fossil or two! This seminar is specifically designed for families with children 8 years and older. Participants will stay at a field camp located 29 miles inside Denali National Park along the Teklanika River. The Field Camp includes rustic tent cabins and a common dining tent. All meals, accommodations, transportation, and instruction are included in the \$235 course fee. Professional development credit is available through UAA. For more information or to register, go to [www.alaskageographic.org](http://www.alaskageographic.org), email [courses@murieslc.org](mailto:courses@murieslc.org), or call 907-683-1269.



[t.pdf](#). Cook Inlet Draft Permit Effluent Limits Prior Permit  
[http://www.epa.gov/region10/pdf/permits/npdes/ak/akG315000\\_permit\\_reproposal\\_prior\\_limits\\_draft.pdf](http://www.epa.gov/region10/pdf/permits/npdes/ak/akG315000_permit_reproposal_prior_limits_draft.pdf)

Cook Inlet Fact Sheet [http://www.epa.gov/region10/pdf/permits/npdes/ak/akG315000\\_fact\\_sheet.pdf](http://www.epa.gov/region10/pdf/permits/npdes/ak/akG315000_fact_sheet.pdf).  
State of Alaska Clean Water Act section 401 Certification  
[http://www.epa.gov/region10/pdf/permits/npdes/ak/akG315000\\_cook\\_inlet\\_draft\\_401\\_cert\\_for\\_repropos al.pdf](http://www.epa.gov/region10/pdf/permits/npdes/ak/akG315000_cook_inlet_draft_401_cert_for_repropos al.pdf). Submit comments to Ms. Hanh Shaw via email to [shaw.hanh@epa.gov](mailto:shaw.hanh@epa.gov) or via facsimile to (206) 553-0165. Submit comments on the ADEC State Certification to Michelle Bonnet via email to [michelle.bonnet@alaska.gov](mailto:michelle.bonnet@alaska.gov).

#### June 20

Comments are due on **ALASKA'S 2012 ANNUAL AMBIENT AIR MONITORING NETWORK PLAN**. The Plan explains the monitoring objectives and a description of all current ADEC network monitoring sites. The document is available at <http://www.dec.state.ak.us/air/am/index.htm>, and is submitted to fulfill the annual network review requirement. For more information or to submit comments, contact Bob Morgan (907) 269-3070 or email [Bob.morgan@alaska.gov](mailto:Bob.morgan@alaska.gov) or Barbara Trost at (907) 269-6249 or email [Barbara.trost@alaska.gov](mailto:Barbara.trost@alaska.gov) or Fax (907) 269-7508.

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Deadline for comments regarding the requested changes to the **NORTHERN FUR SEAL HARVEST REGULATIONS** that govern the subsistence harvest of northern fur seals on St. George Island. The

#### June 24

**KOTZEBUE** - Comments are due on the proposal to **RENEWAL of an OIL DISCHARGE PREVENTION and CONTINGENCY PLAN**, for the **KOTZEBUE ELECTRIC ASSOCIATION INC.** The tank farm has a capacity of 2,149,980 gallons, and is located in Kotzebue, Alaska. The petroleum product on site is ULSD. For more information or to submit comments, contact Dept. of Environmental Conservation, Div. of Spill Prevention & Response, Terminals & Tank Farms Section, 610 University Avenue, Fairbanks, AK 99709, or call (907) 451-5960.

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#### \*\*June 17

<mailto:monica.alvarez@alaska.gov> **MOMS, POPS, & TOTS AT CAMPBELL CREEK SCIENCE CENTER** will be held from 2 to 4pm at the Center is an Introduction to Exploring the Outdoors with

**\*\*Mark items that are new in this issue.**

## **June 22, 2011**

Compiled Weekly by Peg Tileston

On behalf of the Alaska Women's Environmental Network (AWEN), Alaska Center for the Environment (ACE), and Alaska Conservation Alliance (ACA)

## **CONFERENCES, WORKSHOPS, SEMINARS, TRAINING,**

### **June 22 - August 12**

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### **July 26 - 28**

**FAIRBANKS - ED F595 INVASIVE PLANTS OF ALASKA FOR EDUCATORS** will be held on the UFA main campus. 1 Credit. Investigate the invasive plants of Alaska in this three day field course. The course covers the ecological and societal impacts of invasive species, identification of problematic invasive species of Alaska, and methods for invasive plant control. The course includes hands-on use of inquiry-based lessons from Alaska-based invasive plants curricula. Participants will travel to UAF's long-term ecological research sites and engage in a current ecology experiment investigating invasive plants,

## November 1

Deadline for submission for the **1<sup>ST</sup> ANNUAL ALASKA FISH PHOTO CONTEST** sponsored by the U.S. Fish and Wildlife Service, in partnership with Stewart's Photo Shop in Anchorage. We need your help taking great photos that can be used in educational materials to celebrate the diversity of Alaska's native fishes, their seasonal movements and behavior, and their importance to people and ecosystems in Alaska and beyond. In particular, we are looking for high resolution photos taken in Alaska that: convey information about the natural seasonal behaviors and habitats of Alaska's fishes; depict fish that are alive (ideally under water or held partially/fully submerged in the water); depict their different seasonal behaviors/habitats/life cycle stages; capture the unique nature of subsistence, personal use, recreational, & commercial fisheries. (Photos submitted after November 1 will be entered into the 2012 contest). First prize is a Kodak Easyshare Sport waterproof camera donated by Stewart's! Contest details, rules and entry form are at <http://alaska.fws.gov/fisheries/fish/index.htm>. For more information, contact [katrina\\_mueller@fws.gov](mailto:katrina_mueller@fws.gov).

## DEADLINES

### June 24 (IMPROVED WEBSITE INFORMATION)

Deadline for comments regarding the requested changes to the **NORTHERN FUR SEAL HARVEST REGULATIONS** that govern the subsistence harvest of northern fur seals on St. George Island. The

### June 24

**KOTZEBUE** - Comments are due on the proposal to **RENEWAL of an OIL DISCHARGE PREVENTION and CONTINGENCY PLAN**, for the **KOTZEBUE ELECTRIC ASSOCIATION INC.** The tank farm has a capacity of 2,149,980 gallons, and is located in Kotzebue, Alaska. The petroleum product on site is ULSD. For more information or to submit comments, contact Dept. of Environmental Conservation, Div. of Spill Prevention & Response, Terminals & Tank Farms Section, 610 University Avenue, Fairbanks, AK 99709, or call (907) 451-5960.

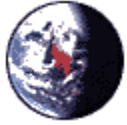
### \*\*July 5

Comments are due on the preliminary decision to approve BP Exploration (Alaska), Inc.'s (BPXA's) application for an **AIR QUALITY CONTROL CONSTRUCTION PERMIT** for the **FUEL GAS HYDROGEN SULFIDE (H<sub>2</sub>S) LIMIT INCREASE PROJECT**. BPXA's application is classified for significant increase in sulfur dioxide (SO<sub>2</sub>) and particulate matter with an aerodynamic diameter less than 2.5 microns (PM-2.5). The increase in emissions due to the Fuel Gas H<sub>2</sub>S Limit Increase Project are: 215 tpy of SO<sub>2</sub>, no increase in direct PM-2.5 emissions. Copies of ADEC's draft permit and technical analysis report (TAR) are available at <https://myalaska.state.ak.us/dec/air/airtoolsWeb/PublicPermitListings.aspx>. For more information or to submit comments, contact Patrick Dunn by Fax at (907) 269-7508, or email [Patrick.Dunn@alaska.gov](mailto:Patrick.Dunn@alaska.gov).

### \*\*July 5

Comments are due on the Public Scoping Letter for **REINDEER GRAZING ENCLOSURES** on the **BERING LAND BRIDGE NATIONAL PRESERVE**. For more information, go to <http://parkplanning.nps.gov/document.cfm?parkID=6&projectID=32156&documentID=41357>.

### \*\*July 5



**aleut-l-owner@lists.uaa.alaska.edu**  
Sent by:  
aleut-l-bounces@lists.uaa.alaska.edu

06/14/2011 01:22 PM

To erin\_green@urscorp.com  
cc  
bcc  
Subject Northern Fur Seal Harvest Regulations - Deadline for  
comments 6/24/11

Messages to Aleut-L may be posted only by those subscribed to the list. To subscribe, please visit <http://lists.uaa.alaska.edu/mailman/listinfo/aleut-l> for more information.

----- Message from Erin\_Green@URSCorp.com on Tue, 14 Jun 2011 13:43:33 -0800 -----

aleut-l@lists.uaa.alaska.edu :To

Northern Fur Seal Harvest Regulations - Deadline for comments 6/24/11 :Subject

**Deadline for comments 6/24/11:**

The National Marine Fisheries Service (NMFS) recently hosted public meetings to discuss the requested changes to the Northern Fur Seal Harvest Regulations that govern the subsistence harvest of northern fur seals on St. George Island, AK. The meetings were held on St. George Island May 17, 2011 and in Anchorage on May 24, 2011. The Aleut Community of St. George Island, Traditional Council petitioned NMFS to authorize the subsistence harvest of 150 male northern fur seal pups annually. NMFS is currently reviewing alternatives and seeks public comments on this request. Please visit the NMFS website for more information: <http://www.alaskafisheries.noaa.gov/protectedresources/seals/fur.htm>. Public comments may be submitted through June 24, 2011 by e-mail to: [furseal@noaa.gov](mailto:furseal@noaa.gov), by postal service to: Kaja Brix, Assistant Regional Administrator, Protected Resources Division, Alaska Region, NMFS, P.O. Box 21668, Juneau, AK 99802, by fax to: 907-586-7557, or hand delivery to the Federal Building: 709 West 9th Street, Room 420A, Juneau, AK. For questions, please call Erin Green at 907-261-9737

Erin S. Green  
Wildlife Biologist  
URS Corporation  
700 G Street, Suite 500  
Anchorage, AK 99501  
907-261-9737 (direct)  
800-909-6787 (toll free)  
907-562-1297 (fax)

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## **List of Stakeholders Contacted**

Aleutian Pribilof Islands Association (APIA)

The Aleut Corporation

Indigenous People's Council for Marine Mammals (IPCoMM)

St. George Tanaq Corporation

Tanadgusix Corporation (TDX)

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## **Appendix B - Scoping Meeting Materials**

Public Meeting Sign-in Sheets (St. George Island and Anchorage)

Public Meeting Presentation

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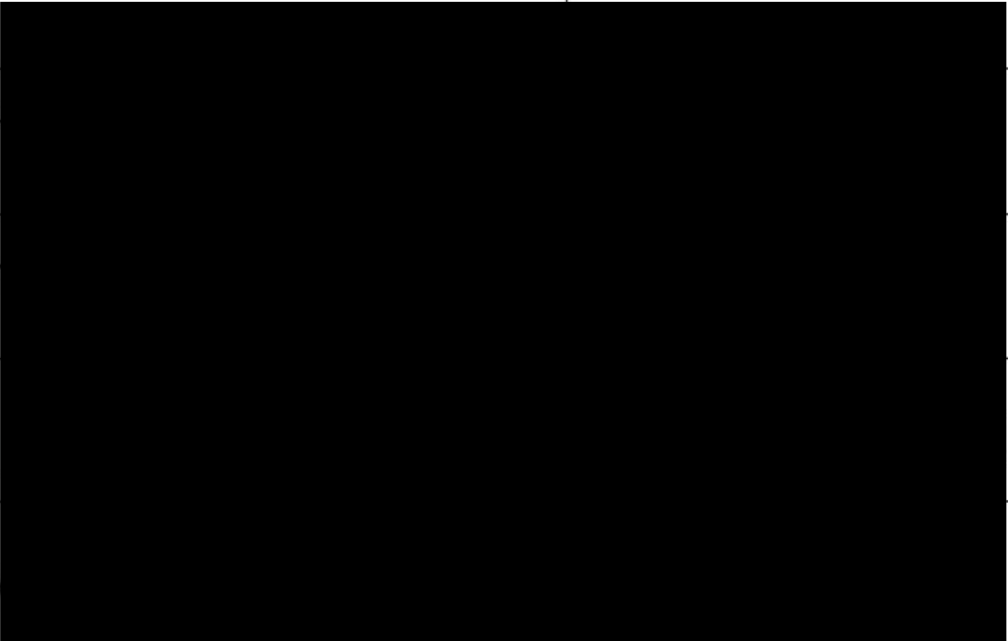
# URS

## Northern Fur Seal Harvest Regulation

### Public Meetings

ST. GEORGE ISLAND  
May 10, 2011

P. 1

PLEASE PRINT Name	Affiliation	E-Mail or Address
1. THEODORE LEKANOF	ST. GEORGE TRADITIONAL council	ted-lekanof@yahoo.com
2. Victor F. Malovansky	" "	N/A
3. Margie Bestenkof	" "	
4. Gira		gmerculief@yahoo.com
5. Ant		Anthony-merculief@yahoo.com
6. C		chris.merculief@yahoo.com
7. M		michael.williams@noaa.gov



# URS


## Northern Fur Seal Harvest Regulation

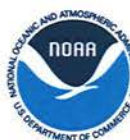
### Public Meetings

ST. GEORGE ISLAND

May 10, 2011

22

PLEASE PRINT Name	Affiliation	E-Mail or Address
8. Joachim Meredith		
9. 		
10. Quinn (Bone)		
11. Tracy and J		
12. Bob		
13. Mr. Jr.	Trad. Council - Island Sentinel	mmerculief@yahoo
14. Sally Merculief	STG Traditional Council	SallyMerculief@starbard.net



# URS

## Northern Fur Seal Harvest Regulation *Public Meetings*

ANCHORAGE  
May 24, 2011

<i><b>PLEASE PRINT Name</b></i>	<i><b>Affiliation</b></i>	<i><b>E-Mail or Address</b></i>
1. Steve MacLean	NPFMC	Steve.MacLean@noaa.gov
2.		
3.		
4.		
5.		
6.		
7.		

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# **Northern Fur Seal Subsistence Harvest Regulations Public Meetings**

May 2011



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# AGENDA

- Introductions
- Purpose of Public Meetings
- Background
- Northern Fur Seal Harvest Environmental Assessment
- Alternatives to be Considered
- Issues to be Analyzed
- Next Steps and Timeline
- How to Comment



**URS**



# PUBLIC MEETINGS

## Purpose:

- Provide information on requested changes in the northern fur seal subsistence harvest regulations.
- Gather public comments to help identify issues to be analyzed.

## Schedule:

Community	Date	Time, Location
St. George Island	Tuesday, May 17, 2011	6:00pm, St. George Traditional Council
Anchorage	Tuesday, May 24, 2011	5:30pm, Anchorage Marriott Downtown



The URS logo consists of the letters "URS" in a large, bold, blue, sans-serif font. The logo is positioned on the left side of a wide photograph that serves as a background for the bottom section of the slide. The photograph shows a rugged, green cliffside overlooking a body of water, with several birds in flight.



# BACKGROUND

- Northern fur seals are a historically and culturally important subsistence resource for Aleut communities of the Pribilof Islands.
  - Until late 1890s, pups were taken as the preferred subsistence food
- NMFS and the Pribilof Island Aleut have cooperated for sustainable management and subsistence opportunity.
- In 1986, current subsistence harvest regulations were established.
- In September 2006, Aleut Community of St. George Island Traditional Council petitioned for revisions.
- In April 2010, NMFS published a Federal Register notice seeking comments on the requested changes, but none were received.
- NMFS is now initiating an Environmental Assessment of the requested changes.



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# ENVIRONMENTAL ASSESSMENT (EA)

## National Environmental Policy Act (NEPA)

- Ensures that federal decision makers have a scientific assessment of environmental consequences
- Ensures that the public has a voice

## Environmental Assessment

- A preliminary review of the proposed action, alternatives, environmental impacts, and mitigation measures
- Determines whether the proposed action would have significant environmental impacts



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# AGENCIES and AUTHORITIES

## National Marine Fisheries Service

- Manages Northern Fur Seals under the terms of the Fur Seal Act and Marine Mammal Protection Act,
  - Section 119 of the MMPA provides for co-management agreements
- Cooperates with the St. George Tribe through co-management agreement (2001):
  - Monitoring program, debris clean-up, disentanglement
  - Research program on population and habitat
  - Co-management of subsistence harvest (Humane Observer, dates to begin harvest, rookeries to use, limits on female take, harvest survey)



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# CURRENT HARVEST MANAGEMENT

- NMFS must publish an estimate of subsistence needs every 3 years.
- Harvest is limited to sub-adult male fur seals.
- Specific hauling grounds for fur seal harvest are identified, currently Northeast and Zapadni hauling ground.
- Period established between June 23 and August 8 during which fur seals may be taken.
- The current harvest allocation is 300 – 500 seals.
- Subsistence harvests in the last decade range from 78-212, with an average of 156 sub-adult male seals taken.



**URS**



# St. George Island

## Northern Fur Seal Rookeries





# REQUESTED HARVEST REGULATIONS

To better meet customary and traditional needs, the Council seeks a change to allow an additional allocation to harvest 150 male fur seal young of the year annually to meet the subsistence needs for the community of St. George Island.

- Allow harvest in more hauling grounds, beyond Northeast and Zapadni
- Provide for a separate fall season, after August 8
- Revise requirements for data collection and cooperation with scientists that are no longer required or are inconsistent with tribal consultation policies and the co-management agreement.



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# ALTERNATIVES TO BE CONSIDERED

- 1) Take No Action (no change in existing harvest regulations).
- 2) Eliminate all harvest regulations governing the subsistence harvest of northern fur seals.
- 3) Modify the current regulations to allow for a regulated harvest of male northern fur seals to meet the subsistence needs described in the petition of the Aleut Community of St. George Island, Traditional Council.
- 4) Modify the current regulations to allow for a regulated harvest of northern fur seals to meet the subsistence needs described in the petition of the Aleut Community of St. George Island, Traditional Council.

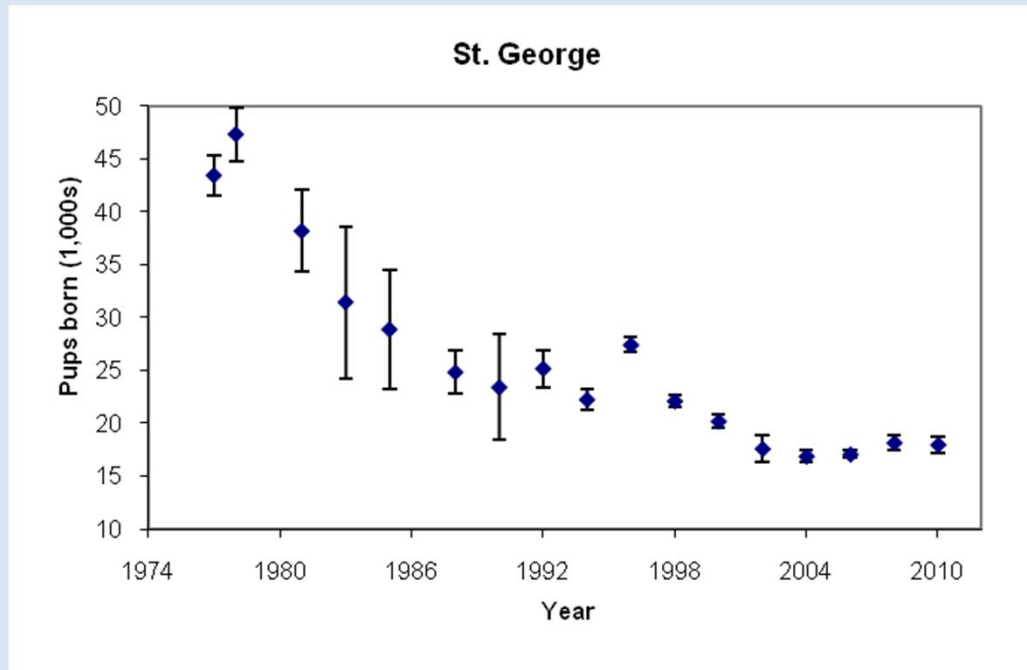


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# PRELIMINARY ISSUES TO BE ANALYZED

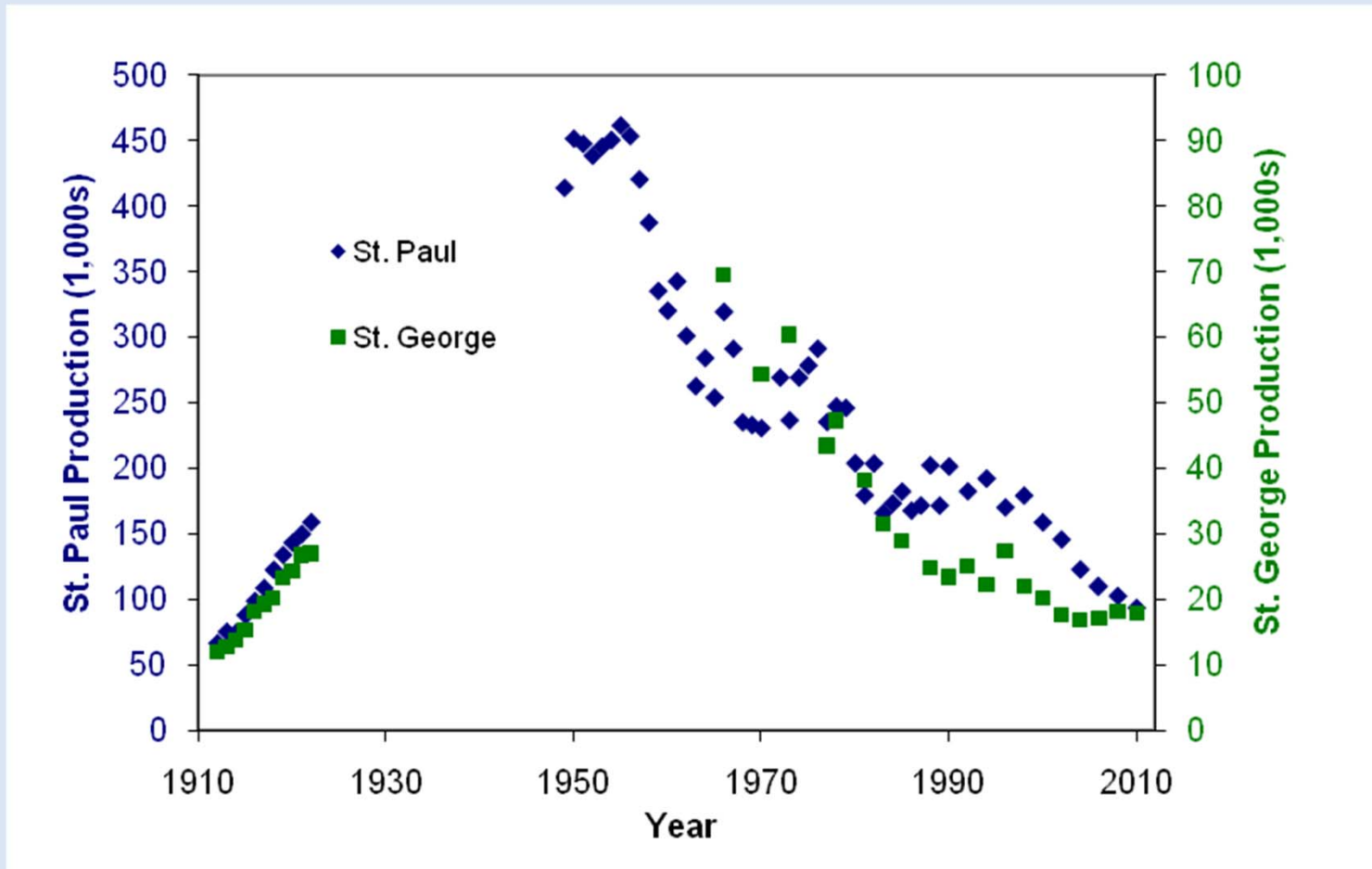
- **Biological Environment**
  - Northern fur seal habitat
  - Population status and trends, sustainable harvest levels



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# ST. GEORGE ISLAND NFS POPULATION

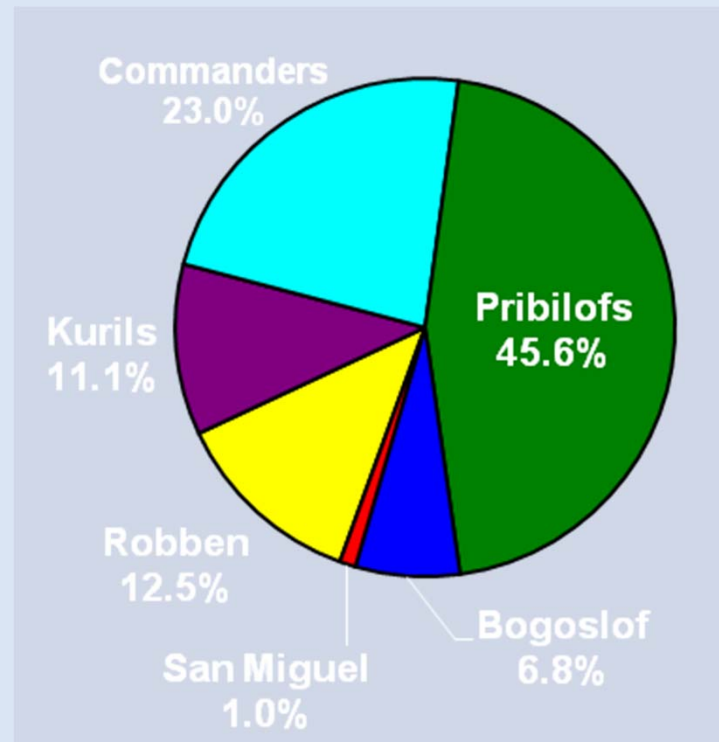


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# NFS POPULATION – WORLD DISTRIBUTION



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# PRELIMINARY ISSUES TO BE ANALYZED

- **Social Environment**
  - Subsistence harvest customs and traditions
  - Subsistence harvest opportunities
- **Cumulative Effects**
  - Climate change effects
  - Effects of commercial fisheries



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# NEXT STEPS

Steps:	Dates:
Public Scoping Meetings	May 10, 2011 - St. George Island Public Meeting May 24, 2011 – Anchorage Public Meeting
Public Comment Period	Ends June 24, 2011 (30 days)
Environmental Assessment Released	September 2011
Record of Decision Signed	October 2011
Proposed Rule Published	November 2011
Public Comment Period on Proposed Rule	Ends January 2012 (60 days)
Final Rule Published, Regulations Take Effect	By May 2012



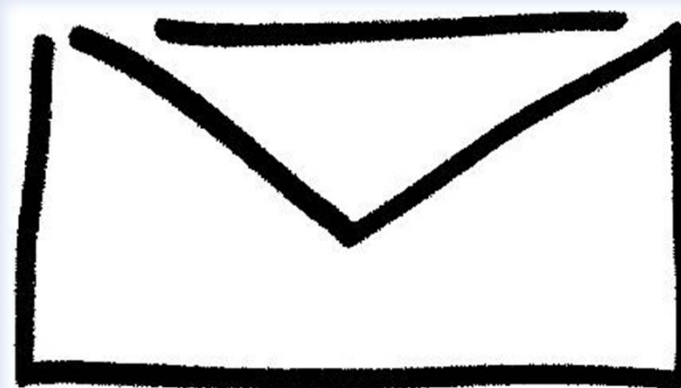
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# HOW TO COMMENT

**DEADLINE for public comments is June 24, 2011**

- \* Give oral comments at this meeting
- \* Fill out a comment form at this meeting
- \* E-mail to: **furseal@noaa.gov**
- \* Fax to: 907-586-7557
- \* Postal service mail to:
  - Kaja Brix
  - Assistant Regional Administrator
  - Protected Resources Division
  - National Marine Fisheries Service
  - P.O. Box 21668
  - Juneau, AK 99802
- \* Hand delivery to:
  - Federal Building
  - 709 West 9<sup>th</sup> Street, Room 420 A
  - Juneau, AK



**URS**



**Thank you**



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## **Appendix C - Scoping Meeting Notes and Comments**

St. George Island Scoping Meeting Notes

Comments Submitted

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# St. George Island Public Meeting Notes

## 6:30pm May 17, 2011

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### Attendees at the Tribal Council Office:

#### Planning Team:

Michael Williams, National Marine Fisheries Service (NMFS)

Taylor Brelsford, URS Corporation

Erin Green, URS Corporation

#### Public Attendees:

Theodore Lekanof - St. George Island Traditional Council

Victor F. Malavansky - St. George Island Traditional Council

Margie Lestenkof - St. George Island Traditional Council

Grace Merculief - St. George Island Traditional Council

Anthony B. Merculief

Chris Merculief - President, St. George Island Traditional Council

Joachim Meredith

Gary E. Merculief

Anthony "Bone" Lekanof

Tracy A. Lekanof

Rodney W. Lekanof

Mark Merculief, Jr. - St. George Island Traditional Council, Island Sentinel

Sally Merculief - St. George Island Traditional Council

## Questions during the Presentation:

### **Proposed Action - Federal Register Notice and Comments**

Q. (Anthony B.): How long was it in the Federal Register?

A. (Mike): A Federal Register Notice inviting comments on the St. George Traditional Council petition to change the fur seal harvest regulations was published April 2010, providing a public comment period. At the close of the comment period in June 2010, no comments had been received.

There was a brief discussion amongst the group about the absence of public comment regarding the proposed changes, including questions about who may submit comments, and who responds to comments. Mike clarified that NMFS will review the scoping comments on the current Environmental Assessment (EA) those determined to be substantive (or relevant) will be addressed in the EA. When completed, the availability of the EA will be announced in another Federal Register Notice.

### **Proposed Action – Requested Changes**

Q. (Anthony B.): Does the tribal request specify that the additional allocation of 150 young of the year would be males? Why does the fourth alternative delete the specification of male fur seals?

A. (Mike): The Traditional Council requested a harvest of male fur seals, which NMFS has characterized as the proposed action in this EA. The fourth alternative listed for the EA does not restrict harvest to male fur seals. This will allow NMFS to analyze the population implications if females were to be harvested, even though that is not the requested action.

Comment by Anthony B.: The community's perspective is that a pup harvest is no different than harvesting lambs or piglets. Including a comparison like this within the document would be helpful to put the issue into a context that other cultures can better understand.

Comment by Anthony B.: Reauthorizing a pup harvest would be a reaffirmation of the historical harvest practices, as they were permitted until the late 1800's. When the Tribe agreed to forego the pup harvest in order to aid in recovery of the fur seal population, we understood that this would be reauthorized when the population was in better shape. However, that never happened, and so now we are requesting this change. Mike and Taylor agreed that the historical perspective was important and should indeed be included in the EA.

Q: Are there any other marine mammal harvests in which the taking of young (i.e. pups) is authorized? Are such harvests regulated?

A: Mike noted that NMFS regulates the harvest of bowhead beluga whales, and for these species, calves or females accompanied with calves may not be harvested. In the EA, the comparisons with other marine mammal species will be explored.

### **Alternatives in the EA**

Q. (Sally): Who chooses the alternatives and how are they discussed?

A. (Mike): NMFS developed alternatives that would help compare the Tribal Council of St. George Island's request with other approaches.

A. (Taylor): The EA will compare the environmental consequences of the different approaches used to provide for the subsistence needs of the community. Alternatives 2, 3, and 4 are different ways of going about meeting this goal, and each approach has its own environmental consequences. The National Environmental Policy Act (NEPA) requires that the managing agencies look carefully and compare the environmental consequences of alternative approaches to meeting the purpose and need of the proposed action. It is important to provide these comparisons, because sometimes those that are unhappy with the proposed action will say that the analysis was not adequate because other alternatives were not considered.

Q. (Sally): Will we do an EA on each of these alternatives?

A. (Taylor): Yes, each of these alternatives will be analyzed in the EA, but only within a single EA document, not in separate EA documents. .

### **Consultation with the Northern Fur Seal Co-Management Council**

Q. (Anthony B.): Since NMFS works with the Tribal Government on the Co-Management Council, shouldn't these discussions on harvest regulations go through the co-management agreement? Would the final action be approved by the Co-Management Council, which has members from NMFS and the Traditional Council?

A. (Mike): NMFS is required to review the requested changes through a NEPA document, in this case an EA. The purpose of this scoping meeting is to get input from the community on the request original submitted by the St. George Island Traditional Council. We think this is a good forum to receive input and concerns. However, if the Traditional Council feels it would be better to go through the co-management process to decide who reviews proposed actions and comments, Mike would be happy to meet with the Traditional Council, as well as the Co-Management Council, in order to discuss the best way to proceed.

The discussion continued while attendees sought clarification regarding relationship between the co-management agreement and the scoping process. Taylor clarified that the NEPA process is separate from the co-management agreement and does not replace it; if the changes to the regulations are approved, the co-management group would meet to discuss implementation, and any additional roles that would result for the Co-management Council and the Tribal Government.

### **Issues for Analysis – Biological Environment**

Comment by Anthony B.: It is important to mention in the EA that the Northern Fur Seal population is declining. Mike assured him that information regarding the population status would be included within the biological environment section. Chris commented that the request for changes to the harvest regulations included language about the harvest of male pups for this reason; it is important to NMFS and to the Tribe to protect the population and to provide for a male pup harvest.

Q: Where do fur seals go?

A: (Mike): Northern fur seals travel across the Bering Sea toward Russia, North of Hawaii and to Southern California. Fur seals cover a huge portion of the North Pacific and this includes the pups. This was not really well known or understood before, it was thought that pups remained nearby, but they do not; they spread out across the Bering Sea.

Q: That is one of our big struggles; the seals are leaving here and are not coming back. What is it that doesn't allow them to come back?

This topic prompted much discussion amongst the group. Some attendees shared stories of people in the Aleutians taking seals, rumors of poaching, etc.

The group also discussed the Russian and Bogoslof Island population counts and asked whether there is sufficient fishery data to use as a comparison in examining fisheries impacts on the St. George fur seals. Mike said that there is no comparable fishery data, so the analysis of problems from fisheries will have to be examined in relations to the Alaska situation.

### **Issues for Analysis – Social Environment**

Q: Question from an attendee regarding the subsistence use of the fur seal pelt.

A: (Mike): There has always been confusion around this issue. Under the subsistence rules, the use of pelts for handicrafts has always been permitted, but the pelt must be "significantly altered," as required by the regulations implementing the Marine Mammal Protection Act. NMFS determined that a tanned hide with artwork on the skin side qualifies as a handicraft which has significantly altered the pelt. Products which alter the skin more than that, such as sewn craft articles, would also qualify. However, just a signature on the back of a pelt is not sufficient.

Q. (Anthony B.): In the event the regulations are implemented, is it too early to talk about the most effective method of killing seal pups?

A. (Mike): I don't think it's too early; I would encourage the community to talk to the Tribal Council about it. It is a good discussion for the co-management team to discuss and until that time, the community can begin discussing the options. Humane taking regulations are important since some stakeholders have concerns about the subsistence harvest.

Comment: (Chris): Speaking as the President of the Tribe, I think one of the most important things we can do is to carefully participate in this process and to step up and exercise positive responsibility in implementing the new harvest opportunity, including the avoidance of taking females. We have one shot of setting up the harvest the way we want, so let's work within the system. The Tribal Council has a good working relationship with NMFS, we're following compliance 100%, and we have a good reputation and good communication with NMFS. Please do everything to work together; this is important not only for our elders, but also for the future of the Tribe. We have a history of working with environmental organizations and creating relationships. Taylor noted that he had seen good work over

the years in which co-management agreements brought government agencies and local uses to share in the conservation effort.

### **Issues for Analysis - Cumulative Effects**

#### Commercial Fisheries:

There was a lengthy group discussion regarding the trawl fleet commercial fishery regulations and the Tribal Council's history of petitioning the managing agencies to request changes to those regulations. Mike reported that NMFS is very interested in including the historical context of fishery regulations and interactions within the EA. He stated that this is a complex issue, and that there is ongoing scientific effort to better understand the changes and analyze the effects of the fisheries on the northern fur seals.

There was further discussion among the attendees regarding analyzing the effects of the commercial fisheries near St. George Island. Anthony B. commented that when the fishing fleet was moved north to protect the sea lions, it impacted the subsistence halibut fishery in the Pribilof Islands. If the fishery could be moved to protect the sea lions, why wouldn't that be done to protect the fur seals? Mike said he would be happy to include information about the halibut fishery in the report, but would need the Tribe's help with data. A member from the group contributed that the State of Alaska has a database on subsistence halibut harvests available. While it may not be complete, it may be helpful.

Q: They moved the trawlers 16 miles east and the Steller sea lion population grew, so can we do that here as a test?

A. (Mike): We could possibly move trawlers as a test, it would need to be analyzed; they have tried similar things for the king salmon and crab fisheries as well. Options are available; it's just a matter of completing an analysis that is serious and independent to evaluate the cumulative effects.

There was a question from the group regarding potential fur seal mortality due to by-catch within the commercial Pollack fishing industry. Mike shared that he had heard of by-catch for some time and the primary culprit was the mid-trawl fishery, which has since been banned.

Comment: We want a healthy seal population, not starving animals due to the fishery taking all the food. There was agreement among the group regarding this sentiment.

Comment: It seems as if the people managing the trawl fisheries don't care about the Pribilof Islands and don't show concern for northern fur seals.

#### Climate Change:

Q: When we talk to people about fur seals leaving the islands, the issue of climate change arises. What is the difference between global warming of the 1970s and 1980s and the projected changes? Global warming was always blamed, but that was not the issue.

A. (Taylor): Currently there are much higher standards for careful analysis of climate change in NEPA environmental review documents. Science is the key to better understanding these issues, and the

agencies have more research available to them now. We must use science to better understand climate change and its effects on the northern fur seal population.

**Other Discussion:**

Q: How much money is available for research on fur seals?

A: (Mike) There is no easy answer regarding funding as our budgets change from year to year, but I can tell you that we have made a commitment to tagging and studying the survival data and we will honor that commitment, even if not funded going forward.

St. Paul

St. George

## Aleutian Pribilof Islands Association, Inc.

1131 E. International Airport Rd.  
Anchorage, Alaska 99518-1408  
Phone (907) 276-2700  
Fax (907) 279-4351

June 2, 2011

Kaja Brix  
Assistant Regional Administrator  
Protected Resources Division  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, AK 99802

RE: St. George Traditional Council's Northern Fur Seal Subsistence Petition

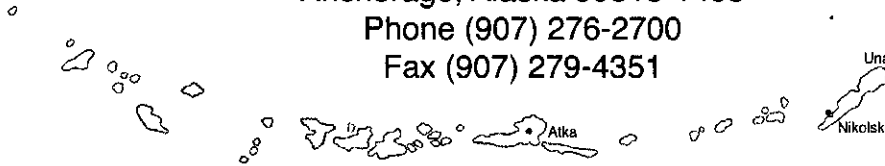
Dear Assistant Administrator Brix,

The Aleutian Pribilof Islands Association, Inc. (APIA) is the regional nonprofit consortium of the thirteen Aleut Tribes, providing, among others, social, educational, public safety, environmental and health services. We work closely with the Tribes' many efforts including environmental programs and are familiar with regional subsistence and co-management issues.

APIA strongly supports the petition submitted by the St. George Traditional Council as described in Alternative #3 of the Environmental Assessment for Northern Fur Seal subsistence harvest on St. George Island. This alternative secures centuries of cultural practices and supports traditional and customary use protections, as required.

The historic relationship of the Pribilof Aleuts and the Northern Fur Seal is indisputable, just as the future of the Northern Fur Seal relies on the Pribilof Aleuts' continued stewardship. This dedicated stewardship is evident in the extraordinary ongoing efforts of the St. George Traditional Council and Tribal members, including activities to address and reduce rookery disturbance, incidental female harvest, entanglement and marine debris. The St. George Traditional Council and Tribal members' earnest and proactive stewardship responsibility is further demonstrated by the fact that the majority of the tons of marine debris annually removed from St. George Island rookeries and beaches are from off-shore sources.

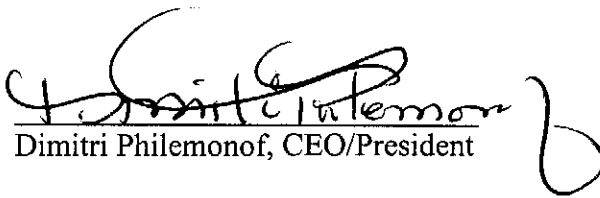
APIA commends the National Marine Fisheries Service continuing commitment to the duty of genuine co-management with the St. George Traditional Council, as it is this



government to government relationship that develops the interaction and mutual understanding essential to effective conservation.

APIA requests that the National Marine Fisheries Service enact the St. George Traditional Council's petition for Northern Fur Seal subsistence harvest regulatory revisions on St. George Island. Please contact Ken Selby at [kens@api.ai.org](mailto:kens@api.ai.org) or 907-276-2700 for additional information or with any questions. Thank you for your consideration of this request.

Sincerely,



Dimitri Philemonof, CEO/President

CC

President Chris Merculief, St. George Traditional Council



Message from Larry Merculieff on Fri, 24 Jun 2011 14:48:11 -0400 -----

**To:** furseal@noaa.gov

**Subject:** St. George Island Traditional Council petition

I wish to go on record as supporting the petition of the St. George Island Traditional Council to take 150 fur seal pups in their annual subsistence harvest. Archeological evidence demonstrates unequivocally that Aleut people have always taken and eaten fur seals of all ages, including pups for thousands of years. It was only with the introduction of U.S. management that Aleut people were precluded from fully engaging in their traditional subsistence practices. There is nothing in current laws that prevents the National Marine Fisheries Service from allowing this kind of harvest. Taking of 150 seal pups is statistically insignificant in terms of affect on the overall health of the stock. To allow the people of St. George to take seal pups as part of their subsistence harvest is the morally correct thing to do as the current situation criminalizes something that was traditional and occurred over thousands of years, and there is no scientific basis to prevent such a harvest.

Thank you for taking my comments

Larry

Larry Merculieff  
Seven Generations Consulting

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