

Statement of the Sierra Club
On S.1063—Huna Tlingit Traditional Gull Egg Use Act of 2011
before the
Subcommittee on National Parks
United States Senate
Washington, D.C.
July 28, 2011

Good afternoon. Thank you for this opportunity to submit the views of the Sierra Club on S. 1063.

My name is Jack Hession. I serve on the Executive Committee of Alaska Chapter of the Sierra Club. I am familiar with the areas within the scope of the bill: Glacier Bay National Park, Icy Strait and Cross Sound, the community of Hoonah and Frederick Sound, and the northern coast of Chicagof Island.

The Sierra Club strongly opposes S. 1063 because it would open Glacier Bay National Park to a consumptive use of a wildlife species, in this case glaucous-winged gulls. This would harm the gull population, be in derogation of park purposes and values, and potentially lead to proposals for the subsistence taking of other wildlife in the park, in three other national parks in Alaska, and in national parks in other states. The Huna Tlingit advocate opening the park to subsistence seal and mountain goat hunting, as well as to egg collecting.

This bill is in direct conflict with Congress's policy governing the management of wildlife in Glacier Bay and other comparable national parks. Glacier Bay is a wildlife sanctuary, one of four national park sanctuaries in Alaska. All forms of the consumption of wildlife, including subsistence practices, are prohibited in these units.

A recent application of Congress's policy is found in the Timbisha Shoshone Homeland Act of 2000 involving Death Valley National Park. Congress specified that "In the special areas any use of park resources by the tribe for traditional purposes, practices, and activities shall not include the taking of wildlife and shall not be in derogation of purposes and values for which the park was established" (emphasis added).

S. 1063 would allow Huna Tlingit tribal members to gather glaucous-winged gull eggs twice a year from up to five gull colonies in the park, resulting in an estimated 22 % reduction in the number of fledglings in the park. However, glaucous-winged gull eggs are available for collection by tribal members at six of the tribe's traditional egg collection sites within Huna Tlingit traditional territory outside the park boundary in the Cross Sound areas. U.S. Fish and Wildlife Service subsistence regulations on gull egg collecting at these sites are in place:

"Current U.S. Fish and Wildlife Service regulations allow residents of Hoonah to gather glaucous-winged gull eggs on National Forest lands in Icy Strait and Cross Sound, including Middle Pass Rock near the Inian Islands, Table Rock in Cross Sound, and other locations on the coast of Yakobi Island between May 15 and June 30. The land and waters of Glacier Bay National Park remain closed to all subsistence harvesting [50 CFR Part 100.3]."

Attached is list and brief description of these sites drawn from a National Park Service study on traditional use of birds' eggs by the Huna Tlingit.

Hoonah is closer to two of the non-park sites than it is to South Marble Island, a productive gull colony (and a major Steller sea lion haul-out) in the wilderness portion of the park, where the proposed egg gathering would first occur. A third non-park site is about as far from Hoonah as South Marble Island is.

Given the availability of the non-park sites, H.R. 1063 is completely unjustified. Huna Tlingit egg collection at these sites is sufficient to maintain a valuable cultural resource without impairing the park.

In a demonstration project a decade ago, Glacier Bay park managers took a party of Huna Tlingits from Hoonah on an egg-gathering trip to one of the non-park sites where glaucous-winged gull eggs were collected. The following year park management chartered a vessel for the villagers, who on their own again collected eggs at the site.

According to the Park Service, the successful trips led to its conclusion that agency facilitation of the villager's egg collecting outside the park is a "reasonable and feasible" alternative to opening the park to this subsistence activity. So too are trips unassisted by the Park Service. Hoonah, a fishing village on Icy Strait, can supply its own vessels for egg collecting trips.

In the decade since its successful demonstration project, the Park Service in Alaska, following the lead of a now-retired superintendent, has decided that the park should be opened to gull egg extraction. When I asked the Alaska directorate of the Park Service to name any other instance in which the Park Service itself had ever proposed to open a national park to the consumptive use of wildlife, they were unable to name any. Their unprecedented decision and advocacy for opening the park is a disturbing and disappointing development. It calls into question their judgment, and their commitment to the mission of the Park Service.

In conclusion, the Sierra Club recommends that the Subcommittee take no further action on S. 1063, a measure clearly not in the national interest.

Thank you for considering our views.