

UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 * (253) 237-3099 * usag.alaska@gmail.com * akgillnet.org

June 29, 2017

Governor Bill Walker and Lieutenant Governor Byron Mallott
Office of the Governor
P.O. Box 110001
Juneau, AK 99811-0001

Sent via email: lt.governor@alaska.gov; albert.kookesh@alaska.gov; Barbara.blake@alaska.gov

RE: Solicited comments for the Statement of Cooperation on Protection of Transboundary Waters (SoC) draft implementation documents

Dear Governor Walker and Lt Governor Mallott:

Thank you for the opportunity to comment on the draft documents for implementing the SoC; the ability to do so is in the spirit of transparency these documents and your transboundary work profess. This step, SOC implementation, is an important one, building on years of effort between the Alaska and BC governments and these documents are tools to drive implementation, which should ultimately protect our watersheds and resources, including the salmon our members harvest.

As a representative of Southeast Alaska's thriving salmon industry, I will continue to ask: "how does the governments' work, such as these SOC-implementation documents, protect (or not) our resources" AND "if our waters are compromised, what is the specific emergency response plan to immediately implement and rehabilitate" AND "if fishermen are unable to fish due to upstream activity and contamination, exactly who, how and when will fishermen and communities be financially compensated for losses"? The draft implementation documents and the SoC don't do enough to answer these critical questions.

But they could, especially if improved, serve to better our situation. Generally, these guiding documents need clearer, descriptive tasks to reduce the chance of misunderstandings. They also need a specific person/department/group listed for each task as it is too easy to not take responsibility when a large group of people are listed. Importantly, the documents do little to

improve public participation and transparency. Also, I suggest you clarify which tasks have funding; add monitoring/activity priorities and potential funding sources for the unsupported tasks. Implementation documents are about doing. Protecting our waters is not something that can wait while Alaska and BC officials figure out what something means in its guiding documents. Specify the tasks, assign responsible parties, find the money and get to work!

Here are some specific suggestions about draft document 3b and c titled, *“Joint Water Quality Monitoring Program for Transboundary Waters PRELIMINARY DRAFT Program Description and Two-Year Work Plan”*. It is hard to decipher what is funded and what is not, including in the tables, especially with this note, “[NOTE: This preliminary draft program description and two-year work plan are not approved or funded by Alaska or British Columbia. Approval of this preliminary draft does not indicate funding approval.]”. It would be more useful to list exactly what time, money, and more is needed for monitoring and prioritize the activities with funding sources or potential funding sources. Then, the State and BC, as well as other stakeholders, can clearly see needs and work to secure funding based on the Plan’s priorities.

Under *“Engagement”* it says, “ongoing engagement”. What does that mean? Are there meetings planned? Surveys? If so, list them and if not, plan for some. United Southeast Alaska Gillnetters appreciates timely, accessible engagement and transparency of all processes relating to our transboundary waters; we value a variety of engagement methods and participatory avenues such as in-person, in writing and on the phone.

“Key questions. It is shocking to see heavy metal concentrations in fish tissue as the sole Alaska study to decide if mining or other industrial activity is affecting our watersheds. Expand this guiding question to include more comprehensive risk assessment to study river sediment, water quality, various fish species and aquatic insects throughout the year and at differing river conditions. We need a variety of scientific information to accurately monitor our water quality. In order to better determine if upstream BC mining is affecting our watersheds we first need baseline studies to determine the current water quality in the Taku, Stikine and Unuk. We then need a comprehensive monitoring program to detect water quality problems. An emergency response plan, such as suggested above, would direct how to deal with any detected pollution.

“Collaboration. Funding. Reporting.” These sections in particular often say “may” and “plan to”. This passive language doesn’t instill commitment from Alaska and BC or provide those of us relying on this work much confidence. We want to know that BC and Alaska will collaborate with non-governmental organizations and others. Coordinated monitoring efforts on both sides of the border and across all entities are needed. Restate that the Program will include regular reporting to the BWG and that those reports will be publically shared. It says *“AK Department of Environmental Conservation and other relevant agencies’ staff may jointly review, summarize*

and evaluate monitoring results...” Change ‘may’ to ‘will’ to use the Departments’ expertise and for those State employees to keep up with the data and program.

The tables. The first item in the Taku table should be cleaning up the Tulsequah Chief Mine but that water quality menace isn’t even listed! That is Taku River water quality priority one and needs action immediately; BC has assured us for many fruitless decades they will clean the area. List more specific “project lead”. Again, it is unclear what is funded and not: “*Collaboration on the collection, documentation, and sharing of traditional ecological knowledge including expert advice*” is listed as unfunded so does that mean the other activities are funded? Next spring/summer under “mid-point review” would be a good time to more thoroughly reconnect with stakeholders/public about the progress and effectiveness of the SoC.

Suggestions regarding the draft “*Communication Plan*”: What happened to the Citizen’s Advisory Group? Our organization was a part of that and appreciated it as a mechanism to learn information and state concerns. Under the “goal” please delete “significant” as one entity is likely to define ‘significant’ differently from another; combined natural resource projects, however small, may produce negative, cumulative effects on our watersheds. It is unclear who exactly will perform and is responsible for the tasks. How often will the websites be updated? How often will BC provide the newsletter to Alaska? Please add our organization to the State of Alaska distribution list. Can this include timely and relevant information about all transboundary-related issues, not just the SoC? Please write distribution list procedure so when responsible parties change we will have continual communication. How exactly will the State (and who specifically) will manage inquiries and communications with its citizens and stakeholders? What is the best procedure for stakeholders to communicate with the State?

Tens of thousands of us have communicated with you, the State of Alaska, concerning our transboundary waters. That’s a lot of people, especially in a state of 739,828! We have asked you, our state’s top elected officials, to formally ask our Federal government for assistance and to utilize the Boundary Waters Treaty to protect our waters.

Monitoring the water quality of our transboundary waters is of dire importance and these documents should assist that work. They do not however, do enough to protect us, which should be the State of Alaska’s ultimate goal! We don’t understand or condone your lack of activity to meet this goal.

The SoC and these draft implementation documents don’t answer my key questions above. We desperately need emergency response plans to be ready if our waters suffer damage—a fast emergency response will help ease a grave situation, such as a mining dam breach. AND we desperately need to know who, how and when we will be financially compensated for any losses. Having these needs and plans clearly written will prepare us and help alleviate potential

upstream impacts along with help to shorten their affects. It's going to take time, collaboration and a lot of resources to be prepared; the State of Alaska and Province of BC cannot do it alone.

Hear the request of Alaskans and our federal delegation --write a letter to Secretary of State Rex Tillerson and ask the Federal government to assist! Only then will we have the means to provide lasting, enforceable protections of our waters. The Feds are waiting, along with tens of thousands of us, for you to act on our behalf. If you choose not to take this next, critical step, please tell us why and how you plan to address our concerns.

Protecting our transboundary waters is a key concern for the members of United Southeast Alaska Gillnetters. Our organization represents the interests of the 473 southeast salmon gillnet permit holders and their families.

Thank you for asking for our comments,

A handwritten signature in black ink, reading "Cynthia Wallesz". The signature is fluid and cursive, with the first name "Cynthia" being more prominent than the last name "Wallesz".

Cynthia Wallesz
Executive Director

Cc: Southeast Alaska Legislators, Alaska Federal Delegation and Southeast Alaska Mayors