

---

## CHAPTER 2: ALTERNATIVES

---



Photograph by Mary Beth Moss.

Glaucous-winged gull nest on South Marble Island.

This Page Intentionally Left Blank

## **CHAPTER TWO: ALTERNATIVES**

### **2.1 ALTERNATIVES CONSIDERED IN DETAIL**

This chapter describes the No-Action Alternative (Alternative 1) and two alternative approaches to managing glaucous-winged gull egg harvest in Glacier Bay National Park including actions common to both action alternatives. The action alternatives were developed after discussions with representatives of federal, state, and local agencies; the Hoonah Indian Association (HIA), interest groups, and the public and were refined based on public comment following the release of the Draft LEIS.

#### **2.1.1 Alternative 1 (No Action)**

Under Alternative 1 (No Action) the harvest of glaucous-wing gull eggs in Glacier Bay National Park would not be authorized. Legislation would not be proposed and gull-egg harvest in the park would remain closed by statute. Alternative 1 (No Action) provides a baseline for evaluating the impacts to park resources that would result from the action alternatives.

#### **2.1.2 Alternative 2 (One Annual Harvest Visit to Two Locations)**

Alternative 2 would propose legislation to authorize the annual harvest of glaucous-winged gull eggs at up to two designated locations on a single pre-selected date on or before June 9.

The National Park Service (NPS) and the Hoonah Indian Association (HIA) would prepare an annual harvest plan each year (see Section 2.2.2) which would identify up to two sites open to harvest based on annual monitoring (see Section 2.2.9) and harvest history. One harvest visit to these sites would be authorized to occur on or before June 9<sup>th</sup> of that year. If inclement weather, logistics or other issues prevented a harvest on or before June 9, no harvest would be authorized in that year.

#### **2.1.3 Alternative 3 (Two Annual Visits to Up to Five Locations)(NPS Preferred Alternative)**

Alternative 3 would propose legislation to authorize the annual harvest of glaucous-winged gull eggs at up to five designated locations in Glacier Bay National Park on two separate dates.

The NPS and the HIA would prepare an annual harvest plan (see Section 2.2.2) which would identify those sites open to harvest based on annual monitoring (see Section 2.2.9) and harvest history. A first harvest visit would be authorized to occur at each of the open sites on or before the 5<sup>th</sup> day following onset of laying as determined by NPS staff monitoring a reference site at South Marble Island or another sentinel location. A second harvest at the same sites would be authorized to occur within nine days of the first harvest. If inclement weather, logistics or other issues prevented a first harvest visit within five days of onset of laying, only one harvest would be authorized in that year. No harvest visits would occur after June 15 of any year.

## 2.2 ACTIONS COMMON TO ALTERNATIVES 2 AND 3

Potential harvest locations, harvest methods, and harvest group size would be similar for both alternatives.

### 2.2.1 Potential Harvest Locations

Glaucous-winged gulls currently nest in locations throughout the park (Figure 2-1; nest counts from Arimitsu et al. 2007 and Zador 2001) including:

- South Marble Island (285 nests)
- Lone Island (115 nests)
- Geikie Rock (48 nests)
- Boulder Island (41 nests)
- Muir Inlet shoreline (between Riggs and Muir glaciers; 32 nests)
- Flapjack Island (26 nests)
- Seabee Island (4 nests)
- Tlingit Point Islet (4 nests)
- Sturges Island (2 nests)
- Sealers Island (1 nest)
- Graves Island (Outer Coast) (unknown # nests)
- Hugh Miller Islet (unknown # nests)
- Margerie Glacier (inaccessible nests)
- Mt. Wright (unknown # nests; inaccessible)
- Muir Inlet Cliffs (unknown # nests; inaccessible)

Any of these sites could be identified by the Superintendent as suitable for harvest. It is likely that gulls would begin nesting in new, as yet unknown, sites in the future. For this reason, the list above may be amended as information on new colonies becomes available. New colonies would be added as potential harvest locations no sooner than six years following the first observation of glaucous-winged gull nesting at that location. This criteria ensures that chicks fledged at a new colony have reached maturity (average age at maturity = 5.4 years; Verbeek 1993) and have had the opportunity to return to the new colony to nest themselves.

Conversely, vegetational succession on South Marble Island and other currently active glaucous-winged gull nesting areas may eventually preclude gull nesting at these sites. In these cases, the Superintendent could remove such sites from the list of potential harvest locations.

In general, harvest sites would be selected based on:

1. Size of colony: Larger colonies are preferred both in terms of maximizing potential harvest as well as in terms of maintaining gull reproductive biology.
2. Gull population parameters: Data on these parameters would be acquired through the annual monitoring program.



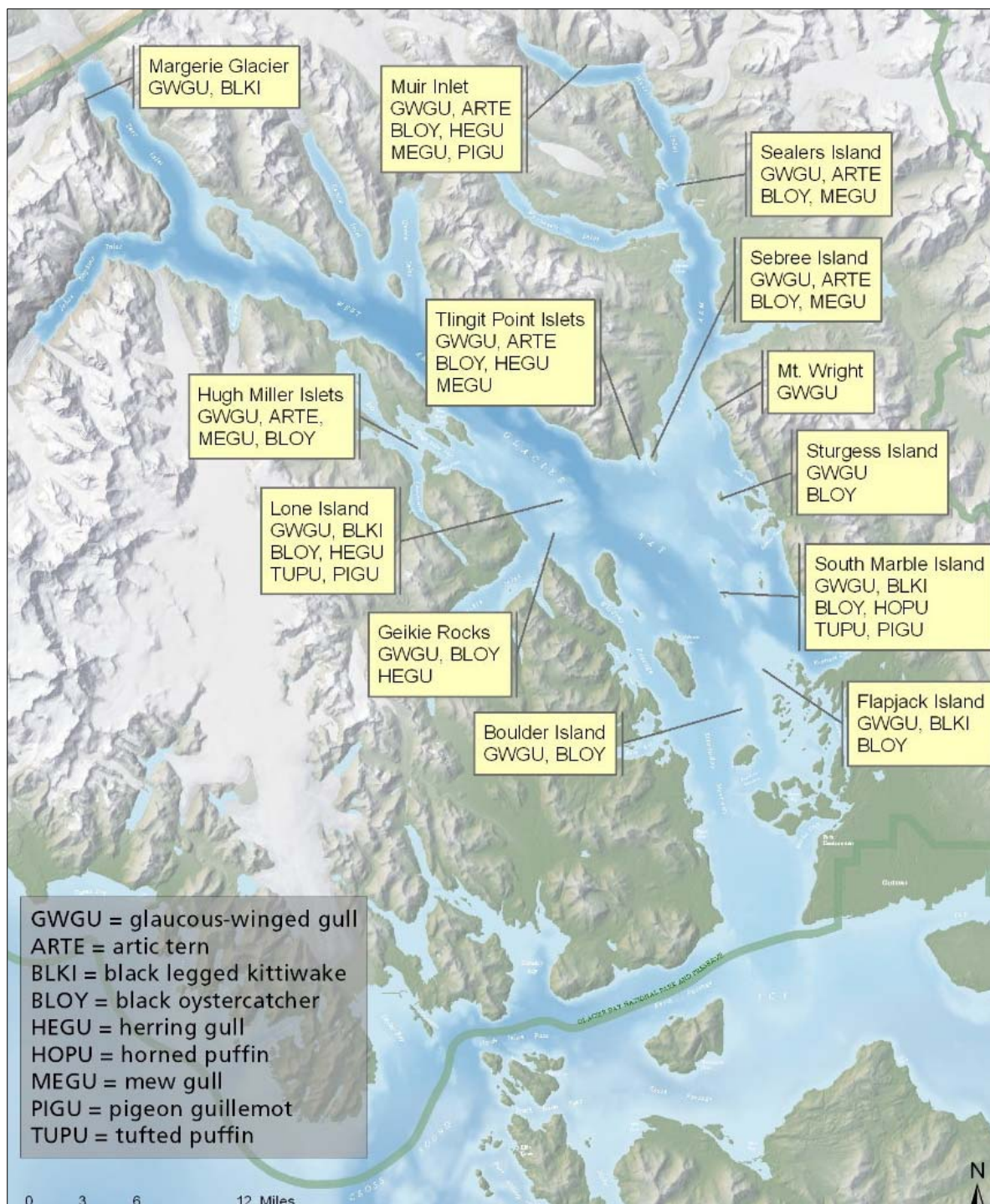


Figure 2-1. Potential harvest locations for glaucous-winged gull eggs and associated cliff and ground nesting bird species in Glacier Bay proper.

- Productivity: Sites with high productivity (producing, on average, more than 2 eggs per nest) are preferred.
  - Gull population status: Sites with larger gull populations are preferred.
  - Recent egg harvest or disturbance: Sites that have not been harvested from or disturbed recently are preferred.
  - Age of colony: Older colonies are preferred; egg laying must be documented for at least 6 years prior to a colony being opened to harvest.
3. Other species present, potential for disturbance: Sites that support no, or few other nesting birds and/or do not serve as marine mammal haul outs are preferred.
  4. Distance from Hoonah: Sites closer to Hoonah are preferred.
  5. Accessibility by vessel: Sites that can be easily and safely accessed by vessel without disturbing other wildlife are preferred.
  6. Safety: Sites that are less steep and provide easier foot access are preferred.
  7. Visitor use: Sites with low levels of visitor use are preferred.

### **2.2.2 Annual Harvest Plan**

Each year, the NPS and the HIA would jointly prepare a harvest plan. The plan would identify sites open to harvest based on information identified in Section 2.2.1 above, as well as monitoring data collected per Section 2.2.9. The harvest plan would include, at a minimum, vessel(s) to be used to access harvest sites, tentative itinerary for harvest date(s), harvest locations, and names of harvesters. Information in this plan would be used to prepare any necessary park permits including regulatory exemptions to CFR 36 13.1178 (see 2.2.6 Accessing Sites).

### **2.2.3 Harvest Visits**

A harvest visit would be defined as an event in which one or more harvesters access a nesting colony and removes one or more eggs from the colony.

### **2.2.4 Harvest Methods**

The HIA would assign harvesters to search sections in each colony open to harvest. Harvest locations and access pathways would be delineated to minimize contact with other bird colonies and to ensure that harvesters moving through a colony would not disturb hauled out marine mammals. Harvesters would be authorized to collect eggs from nests with one, two, three or four eggs; however, harvesters could choose to harvest according to their families tradition (i.e., leaving nests with three or four eggs undisturbed) if they chose. Regardless of the clutch size or harvest strategy selected, harvesters would be required to remove all eggs from harvested nests. Harvesters would tally the number of nests located and harvested from (the number of nests with zero, one, two, three, and four eggs). No eggs would be taken from nests with pipping or star-fractured eggs. Harvesters would make only one pass through each colony and would move steadily through nesting areas to reduce disturbance. No time limit in the colony would be

imposed on harvesters. Resting, eating, etc. would take place on beaches or outside nesting areas to reduce disturbance.

### **2.2.5 Harvest Limits**

The total number of eggs harvested in a particular location, on a particular day, or in a particular year would not be regulated. Harvesters would be authorized to harvest as many eggs as available within the constraints of the alternatives.

### **2.2.6 Harvest Group/Group Size**

Each harvest group would include up to twelve tribal members identified by the HIA. In addition, one official representative (from the NPS and/or the HIA) would accompany the group to collect data. This individual would remain on the beach and would also serve as the logistics coordinator, maintaining contact as necessary with harvesters. The Superintendent may authorize additional participants/observers to join the group, but these individuals would remain on the beach and/or on the vessel(s) to minimize disturbance in the breeding colonies. Harvesters would abide by the requirements of the Wilderness Visitor Use Management Plan as well as the park's annual compendium.

### **2.2.7 Accessing Sites**

Vessels associated with harvest activities would be required to adhere to vessel operating regulations per 36 CFR Part 13. Depending on harvest sites authorized, a permit may be required to waive the 100-yard approach distance to South Marble Island, Flapjack Island, Boulder Island, Geikie Rock and/or Lone Island (36 CFR 13.1178) to allow access to, and foot traffic at, harvest locations. However, vessels would not be permitted to approach hauled out marine mammals closer than 100 yards.

A 2003 amendment to the Memorandum of Understanding between the NPS and the HIA authorizes the HIA to allocate vessel entries to tribal members during the June 1– August 31 visitor season. The HIA would use this vessel entry provision to access Glacier Bay to harvest gull eggs. Vessels associated with egg-harvest activities would call in to Bartlett Cove dispatch upon arrival in the park and would comply with all park vessel regulations other than those exempted through this action.

Vessels associated with harvest would access South Marble Island from one or more of five small beaches (Figure 2-2). To spread out the harvest group, individuals would be dropped at as many of these locations as feasible. Vessels accessing South Marble Island would remain at least 100 yards from hauled out marine mammals and 50 yards from other cliff and ground nesting bird colonies; vessels accessing other harvest areas would remain 100 yards from hauled out marine mammals and 100 yards from areas of concentrated bird nesting (Figures 2-2, 2-3, 2-4). If new colonies emerge at locations subject to vessel approach or foot traffic restrictions, additional waivers may be required.

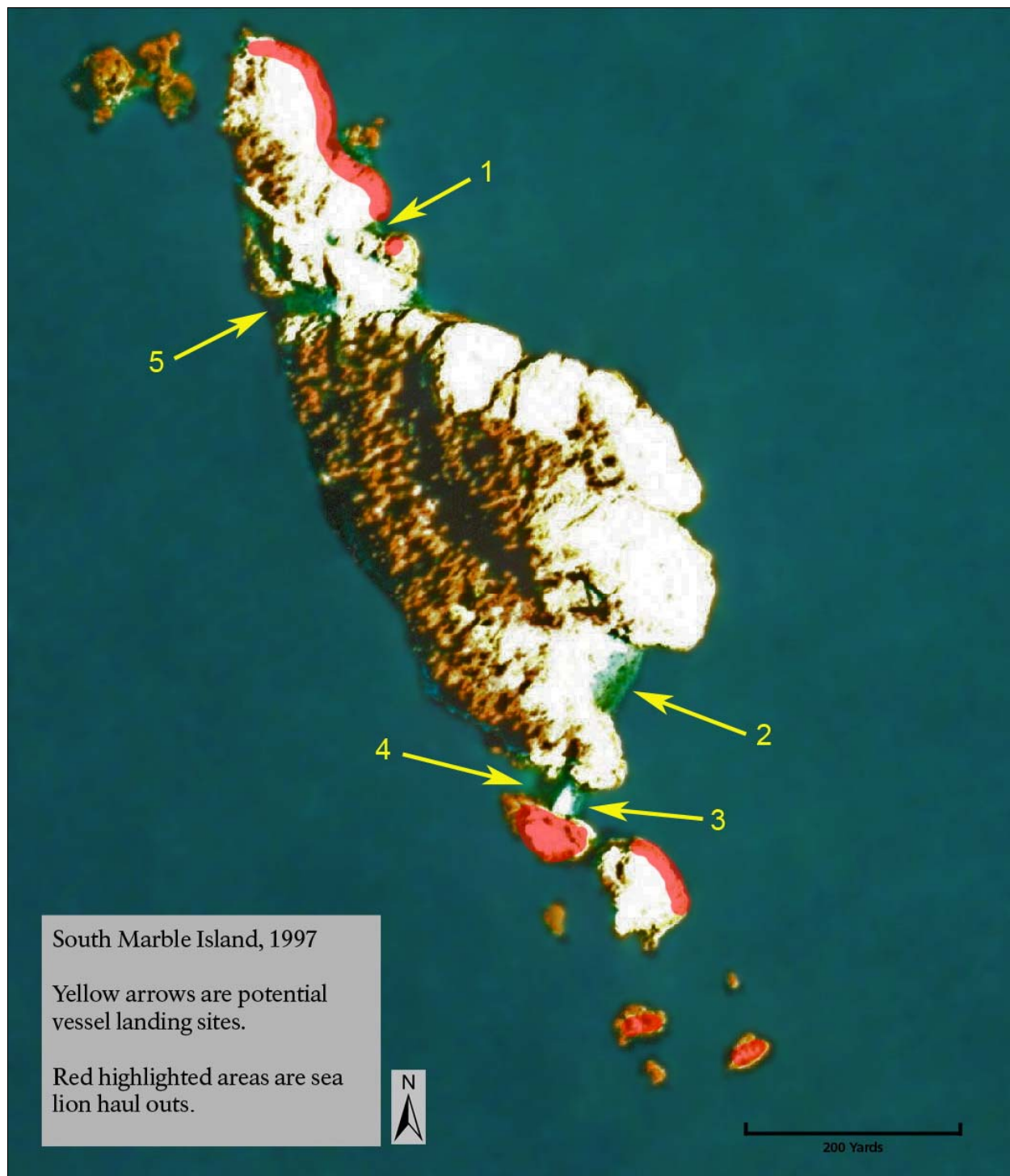


Figure 2-2. Potential vessel landing sites and their proximity to sea lion haul outs on South Marble Island.



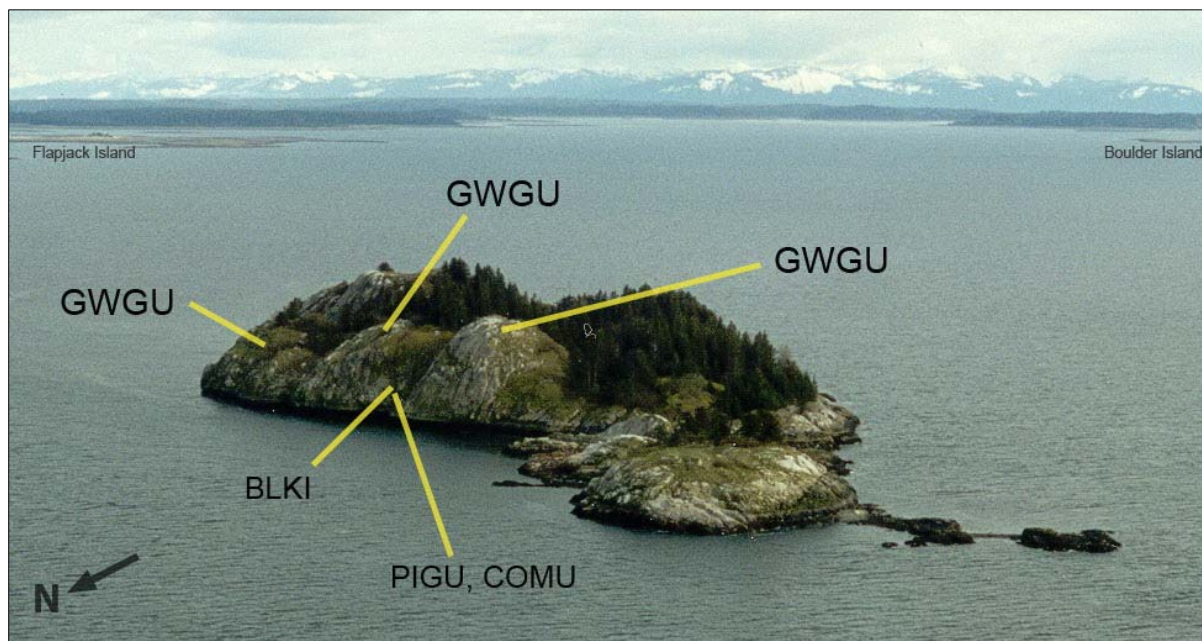
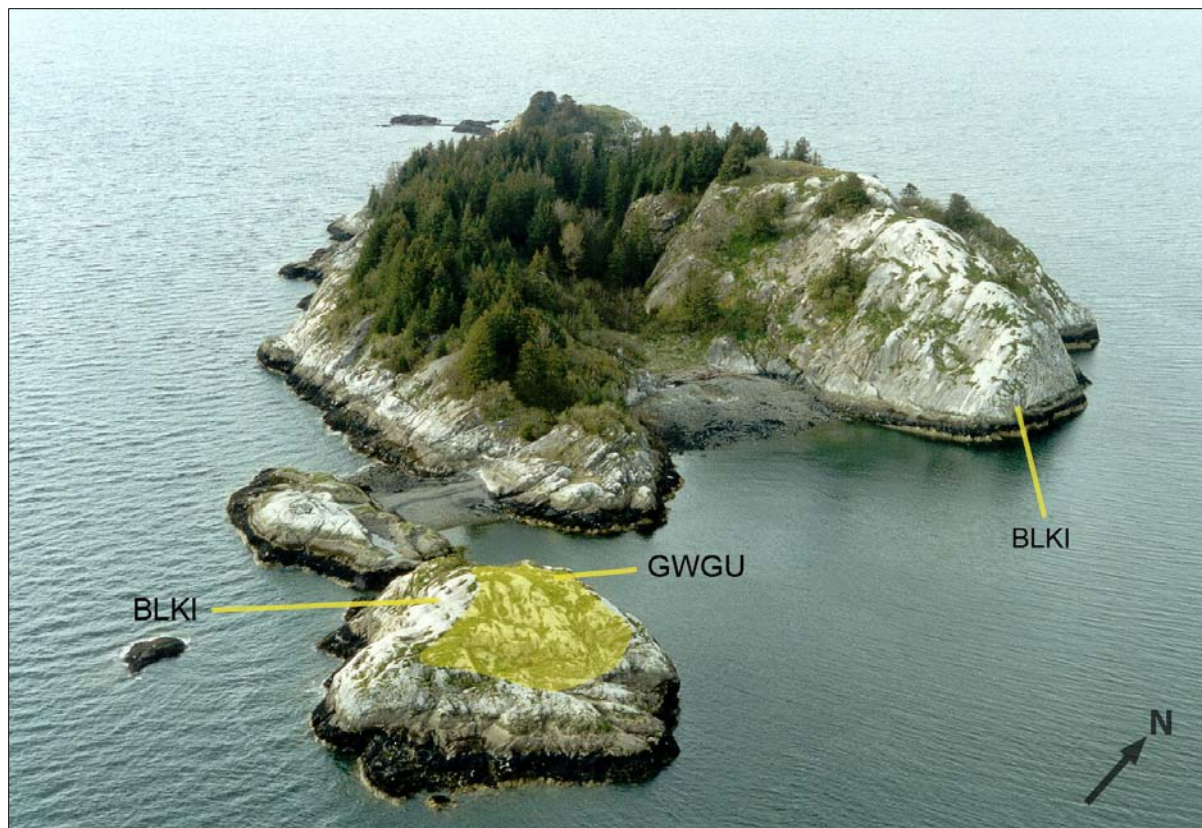


Figure 2-3. Glaucous-winged gull and other cliff and ground nesting bird colony locations on South Marble Island. GWGU = Glaucous-winged gull, BLKI = Black legged kittiwake, PIGU = Pigeon Guillemot, COMU = Common murre.



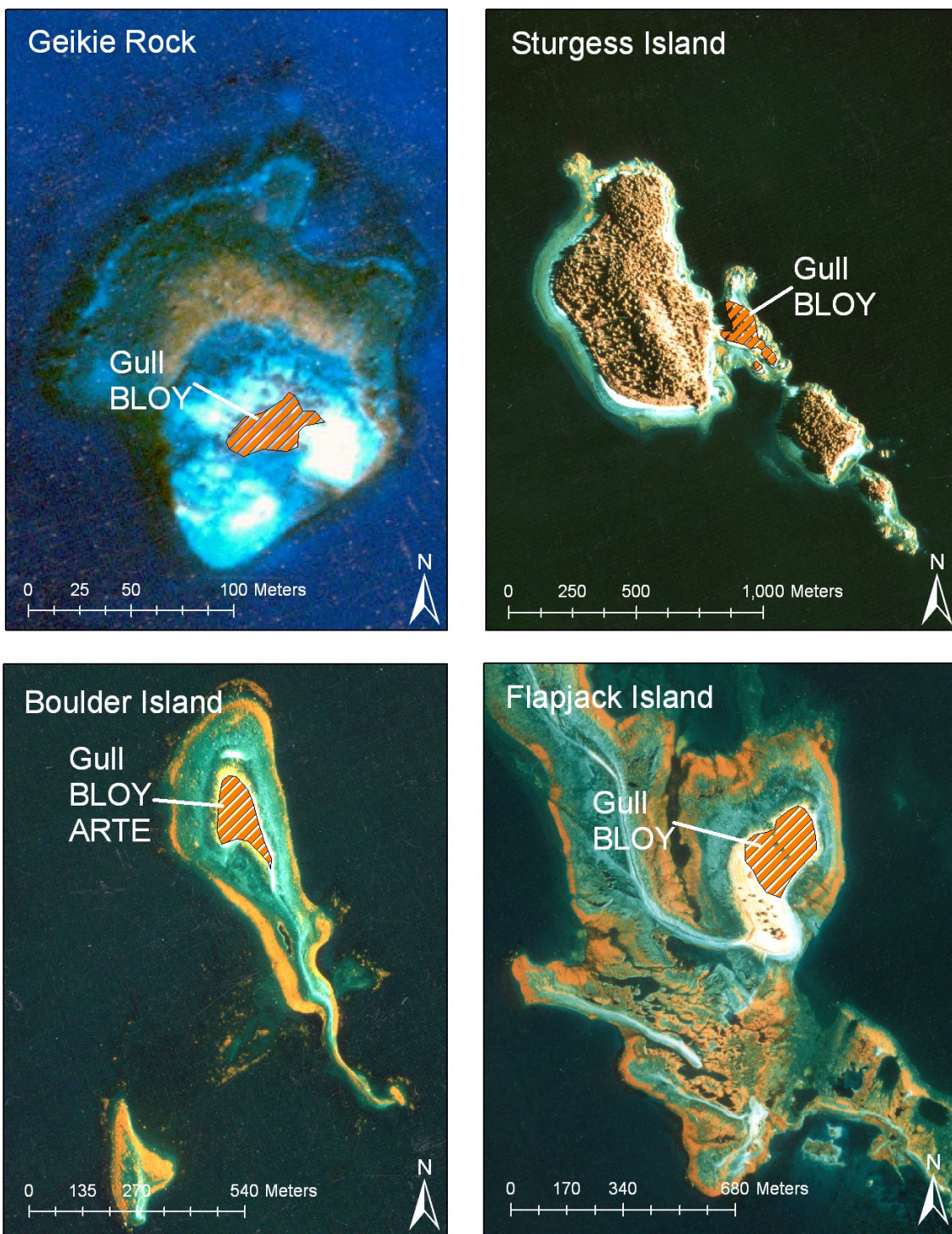


Figure 2-4. Glaucous-winged gull and other cliff and ground nesting bird colony locations in Glacier Bay National Park. Gull = glaucous-winged gull, BLOY = black oystercatcher, ARTE = arctic tern.



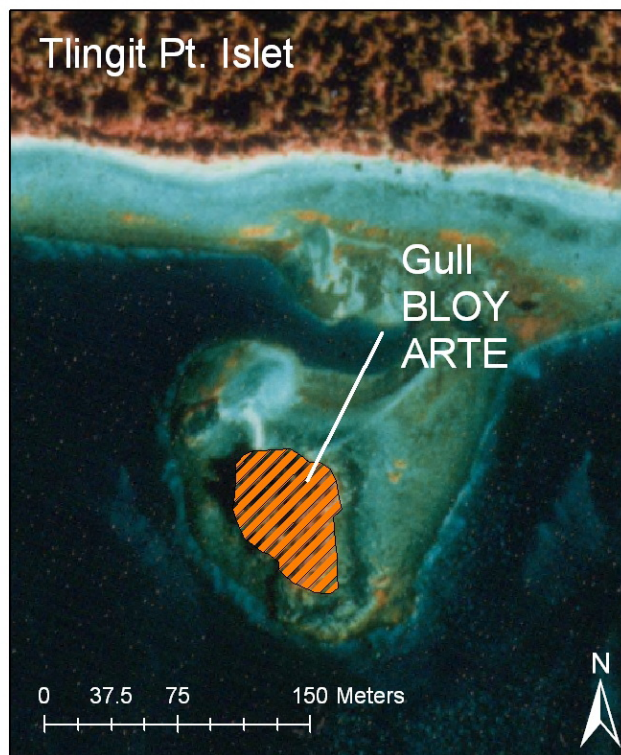
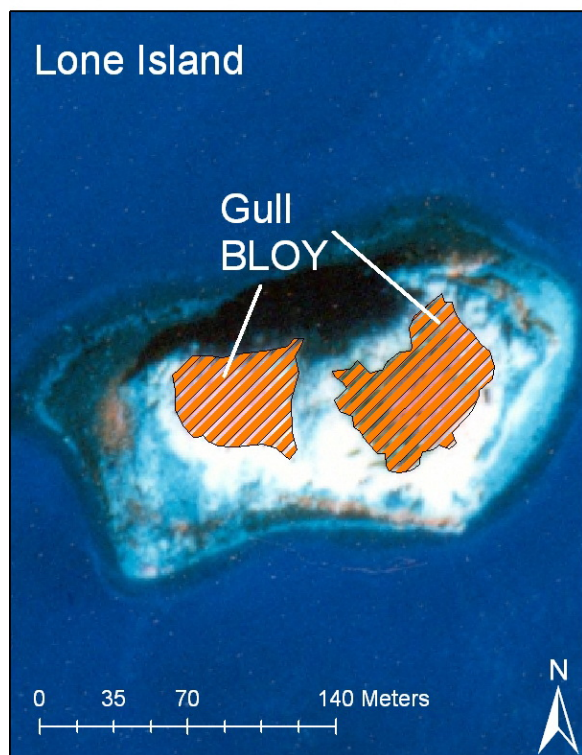
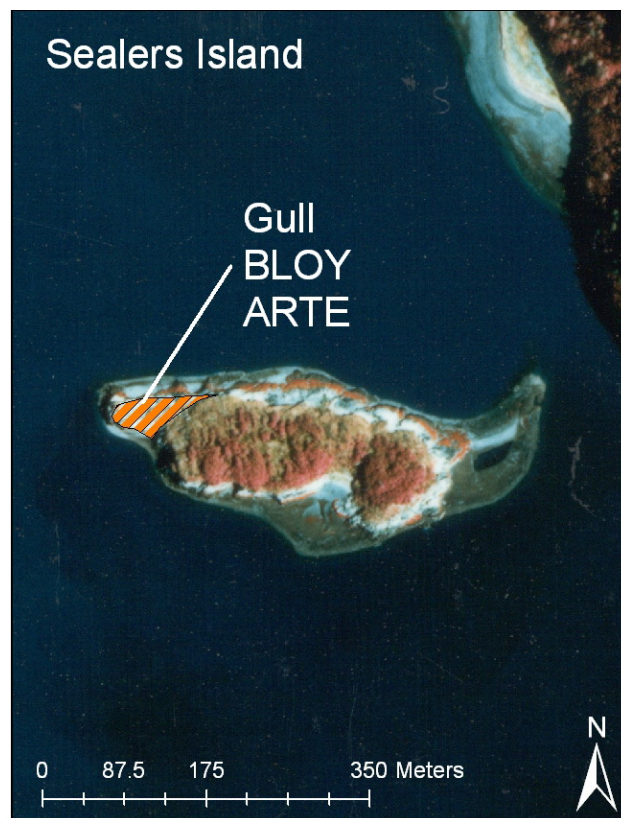


Figure 2-4, cont'd. Glaucous-winged gull and other cliff and ground nesting bird colony locations in Glacier Bay National Park. Gull = glaucous-winged gull, BLOY = black oystercatcher, ARTE = arctic tern.

### **2.2.8 Harvest Data**

On-site activities would be documented in an annual report prepared by the HIA and submitted to the Superintendent following the close of the harvest season. The annual report would include:

- Date of site visits, harvest locations, and number of harvesters/site
- Number of eggs taken from nests with one, two, three, and four eggs as well as number of nests with no eggs located at each site per visit
- Number of pipped, star-fractured, or predated eggs and number of hatched chicks in nests located at each site per visit
- Number of marine mammals hauled out at harvest location; number of animals leaving the haul out and entering the water before, during or immediately after harvest activities; behavioral changes including increased alertness or increased aggressive interactions at each site per visit
- Other species present at each site per visit
- Visitor interactions at each site per visit

### **2.2.9 Monitoring Program**

A monitoring plan would be developed to help the NPS track glaucous-winged gull productivity and population status and trends and to identify potential impacts to park purposes and values. Monitoring activities would occur before, during and after harvest activities.

#### **Annual Monitoring Conducted by National Park Service**

Annual monitoring would assist the Superintendent in making decisions regarding harvest locations, harvest timing, and other harvest-related parameters and would help ensure that harvest activities would not impact park purposes and values. The NPS, with assistance from the HIA, would collect the following types of information contingent upon funding:

- Glaucous-winged gulls:
  1. Identify onset of laying as determined by monitoring a reference site at South Marble Island or other sentinel location.
  2. Conduct a mid-season adult count by circumnavigating harvested nesting islands at high tide during acceptable weather.
  3. Conduct nest counts of nests with zero, one, two, three, four eggs during harvest.
  4. Conduct a complete survey just before hatch of all harvested islands.
- Sea lions and harbor seals: Conduct visual counts of the number of marine mammals hauled out at South Marble Island and other potential egg harvest sites.
- All avian species: Prior to harvest, conduct a vessel-based survey of potential egg harvest sites to tally numbers of all bird species seen.



- Visitor Experience: Monitor the number of positive and negative comments to NPS staff about egg harvest activities.
- Cultural: Monitor the number of individuals participating in egg harvest and how eggs are used (consumed at home, at celebrations, distributed in community, distributed outside of community).

### **Three-Year Study**

In addition to annual monitoring, a three-year study is highly recommended following the first year of harvest to identify potential causes of change in park glaucous-winged gull population levels. The study would include an assessment of egg laying phenology, predation pressure, and reproductive success in a subset of the South Marble Island colony (or other location). This would be accomplished by stationing a biologist(s) on South Marble Island for one to two weeks in mid- to late May to follow study protocols described in Zador (2001) or modified as new protocols are developed. This study would assist NPS in comparing the effects of harvest and environmental factors on glaucous-winged gull populations.

#### **2.2.10 Superintendent Authority**

The Superintendent would retain the authority to modify or halt harvest activities in a given year should monitoring data or other evidence suggest that harvest activities could compromise the viability of gull populations.

### **2.3 MITIGATION MEASURES**

Mitigation measures are specific methods for avoiding, minimizing, rectifying, reducing, or compensating for an alternative's adverse effect(s).

#### **2.3.1 Biological Environment**

Mitigation measures for biological resources are largely incorporated into the action alternatives described in preceding sections. Both action alternatives incorporate adaptive management by allowing the Superintendent to select harvest sites and/or to preclude harvest at a particular site; this approach is essentially mitigative in design. Ongoing monitoring of population levels will help the NPS develop strategies to ensure that biological resources are not impacted by any alternative.

#### **2.3.2 Human Environment**

A number of mitigation measures could be implemented to alleviate impacts to ethnographic resources should Alternative 1 (No Action) or Alternative 2 be implemented. These measures would include a variety of efforts aimed at documenting and transmitting the cultural practice of egg harvesting.

- The HIA and NPS could jointly produce a publication relevant to the native community that describes traditional egg harvest practices.

- The NPS could complete additional ethnographic studies focused on collecting and preserving information about the Huna Tlingit use of bird eggs, as well as other historic events and traditional practices.
- The NPS could conduct programs that encourage legal traditional uses in Glacier Bay to increase opportunities for the Huna Tlingit to maintain ties and interact in a meaningful way with their traditional homeland.

## **2.4 THE NPS PREFERRED ALTERNATIVE**

Alternative 3 is the NPS preferred alternative for several reasons. First, it most closely simulates the traditional harvest strategy of the Huna Tlingit who harvested from a given site on more than one occasion. Second, this alternative would maximize the number of eggs harvested and thus available to the community of Hoonah. Third, this alternative is expected to have the longest lasting positive effects on the Huna Tlingit culture as it involves a greater number of young people who would thus be able to pass on information about the cultural practice of gull egg harvest. Monitoring of egg harvest activities, gull productivity, gull egg predation, and marine mammal disturbance and subsequent adaptive management would help ensure that the park's purposes and values would be protected. The Superintendent would retain the authority to preclude harvest at any site.

## **2.5 THE ENVIRONMENTALLY PREFERRED ALTERNATIVE**

In accordance with Director's Order 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* (NPS 2001), the NPS is required to identify the "environmentally preferred alternative" in all environmental documents, including environmental impact statements. The environmentally preferred alternative is "the alternative that causes the least damage to the biological and physical environment; it also mean the alternative which best protects, preserves, and enhances historic, cultural, and natural resources."

Based on these criteria, Alternative 3 is the environmentally preferred alternative. While Alternatives 1 (No Action) and 2 have less impact on the biological environment, neither protects nor preserves the cultural resource associated with traditional gull egg harvest practices. Alternative 3 accomplishes this while preserving the biological integrity of Glacier Bay National Park in that most harvested gull eggs would be re-laid and gull reproductive success would not be impaired.

## **2.6 ACTIONS OR ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS IN THIS LEIS**

During the planning process, the park considered several different concepts and actions for authorizing gull egg harvest within Glacier Bay which were subsequently eliminated from further analysis. These options and the rationale for no longer considering them are described below.

### **2.6.1 Harvest of Other Cliff/Ground Nesting Species**

In addition to glaucous-winged gull eggs, the Huna Tlingit harvested eggs of many cliff and ground nesting birds including black-legged kittiwake, Arctic tern, Pelagic cormorant, Canada goose, mallard, black oystercatcher, tufted puffin, grouse, ptarmigan, and other duck species (Hunn et al. 2002). Because specific biological data is limited for these species in Glacier Bay National Park and because this LEIS responds only to the direction of congress as stated in P.L. 106-455 which directs the Secretary to study “sea gulls living within the park to assess whether sea gull eggs can be collected” the LEIS does not consider authorizing the harvest of other bird species’ eggs.

### **2.6.2 Vegetation Manipulation to Maintain Gull Nesting Habitat**

Successional processes occurring throughout Glacier Bay National Park result in ever changing vegetative communities. Succession has affected the suitability of past cliff and ground nesting areas such as North Marble Island which no longer supports a breeding colony of glaucous-winged gulls. Inevitably, sites which are currently suitable as cliff and ground nesting bird habitat will decrease in suitability as vegetation encroaches into nesting areas.

While the Tlingit are known to have managed vegetation in prime berry picking habitats (Thornton 1995), Hunn et al. (2002) stated that vegetation control had never been implemented in gull nesting habitat. It is possible that the need to control vegetation had not arisen and thus vegetation manipulation was not documented in oral tradition. Because this tradition was not documented, and because vegetation control in backcountry areas is counter to NPS policy, this analysis will not consider any actions to manipulate vegetation to maintain or foster earlier successional stages more suitable for nesting birds.

### **2.6.3 Unregulated Harvest of Gull Eggs**

Hunn et al. (2002) noted that traditionally no formal limits were placed on the number of people that gathered eggs at a particular site or on the number of harvest visits made to a particular site in a given year. It is likely that informal communication within the Hoonah community and community sharing of the harvest bounty “regulated” the harvest of glaucous-winged gull eggs.

Some tribal members suggested that the community should be authorized to “informally” regulate harvest of glaucous-winged gull eggs without oversight by the NPS or the HIA. This alternative was not considered as it would be difficult to monitor the effects of such activity on park resources and values.

### **2.6.4 Other Harvest Strategies**

The harvest strategy outlined in Alternatives 2 and 3 allows for a range of traditional strategies to be implemented including harvesting from only those nests with one egg, harvesting all eggs from nests with either one or two eggs, and harvesting all eggs from any nest. These strategies account for 61.4 % of traditional strategies cited by interviewees in a 1999 ethnographic study of Huna Tlingit egg harvesting practices (Hunn et al. 2002). A number of other strategies were

cited by one or more tribal members including floating eggs prior to harvest to determine whether they have started developing (and hence should be left in the nests to hatch) and removing only some of the eggs from a clutch.

Although floating eggs in water is a technique that would allow harvesters to determine whether a particular egg already supported a developing chick, it also requires handling each egg, potentially chilling the egg by floating it in cold water, and would greatly increase the amount of time harvesters remained in a nesting colony. The action alternatives stipulate an early harvest date to ensure that the majority of eggs harvested will not be developing. For these reasons, egg floating was not considered to be appropriate or necessary.

Some Huna Tlingit noted that it was traditional to take only some eggs from a clutch, leaving others in the clutch to hatch. Because female gulls are stimulated to relay only when a nest is completely empty, this practice was not considered.

### **2.6.5 Facilitating Harvest Outside Park Boundaries**

During the public scoping period following the publication of a Notice of Intent to Prepare an Environmental Impact Statement in the Federal Register (71 FR 54687), the NPS received comments from a private citizen recommending that NPS consider an alternative which precluded harvest within Glacier Bay but established a “cooperative program with the Huna Tlingit under which the park would facilitate, through transportation and other assistance, gull egg collecting at Middle Rock and other glaucous-winged gull nesting sites outside park boundaries.” The commenter also suggested that NPS consider this alternative during the public scoping period following release of the Draft LEIS.

While NPS considered this alternative, we found that it did not address the purpose of the LEIS which is to respond to the Congressional direction outlined in Public Law 106-455. In this legislation, Congress specifically directed NPS to assess whether “sea gull eggs can be collected in Glacier Bay National Park without impairing the biological sustainability of the gull population in the park.” Congress clearly defined the geographical scope of consideration as Glacier Bay National Park; thus the LEIS considers only those alternatives which would authorize harvest within Park boundaries

### **2.6.6 Shifting Harvest Sites Annually**

The NPS received comments during the public comment period following release of the draft which recommended that harvest sites be shifted every year to potentially reduce impacts to breeding colonies. NPS considered this action, but determined that suitable harvest sites should be selected each year based on the results of annual monitoring and outlined in the annual harvest management plan described for all action alternatives. This adaptive management strategy would allow NPS to use the most current data available as well as environmental and other conditions in selecting suitable harvest sites. In some cases, this might include closing one or more sites to harvest in one or more consecutive years. Conversely, should monitoring determine that a given site could sustain harvest in consecutive years, the annual harvest plan would allow harvest.



## **2.7 SUMMARY AND COMPARISON OF ALTERNATIVES**

Alternative 1 (No Action) would not authorize gull egg harvest anywhere in Glacier Bay National Park. Alternative 2 would authorize gull egg harvest at two locations on a single date while Alternative 3 would authorize gull egg harvest at five locations on two dates. Harvest strategies would be identical for both action alternatives. Table 2-1 provides a comparison of the components of the three alternatives. Table 2-2 provides a comparison of environmental effects of alternatives based on the impact analysis documented in Chapter 4 of the LEIS.

Table 2-1. Comparison of Alternative Actions

	<b>Alternative 1: (No Action)</b>	<b>Alternative 2 (One Annual Harvest Visit to Two Locations)</b>	<b>Alternative 3 Two Annual Visits to Up to Five Locations)</b>
<b>Management Emphasis</b>	Management would emphasize minimizing impacts on gull colonies.	Management would emphasize providing for a minimal level of gull egg harvest to maintain traditional cultural practices of the Huna Tlingit.	Management would emphasize closely simulating the traditional practice of harvesting eggs several times during a season at locations throughout Glacier Bay.
<b>Egg Harvest Location</b>	Egg harvest would not be authorized within park boundaries.	Egg harvest would be authorized at two locations in the park.	Egg harvest would be authorized at five locations in the park.
<b>Number of Harvest Visits</b>	No harvest would be authorized.	One harvest visit to each site.	Two harvest visits to each site.
<b>Egg Harvest Timing</b>	No harvest would be authorized.	Harvest would occur on or before June 9.	First harvest would occur on or before the 5 <sup>th</sup> day following onset of egg laying. Second harvest would occur within nine days of the first harvest.
<b>Egg Harvest Strategy</b>	No eggs would be harvested.	All eggs harvested from nests containing 1, 2, 3 or 4 eggs or harvest only from nests with 1 or 2 eggs. No pipping or star-fractured eggs harvested.	All eggs harvested from nests containing 1, 2, 3 or 4 eggs or harvest only from nests with 1 or 2 eggs. No pipping or star-fractured eggs harvested.
<b>Number of Harvesters in Group</b>	No harvesters authorized.	12 or fewer harvesters and 1 observer per site.	12 or fewer harvesters and 1 observer per site.
<b>Monitoring</b>	No monitoring activities.	Monitoring activities as described in 2.2.9.	Monitoring activities as described in 2.2.9.

Table 2-2. Comparison of environmental effects of alternatives

	<b>Alternative 1: (No-Action)</b>	<b>Alternative 2: (One Annual Harvest Visit to Two Locations)</b>	<b>Alternative 3: Two Annual Visits to Up to Five Locations)</b>
<b>Glaucous-winged Gulls</b>	<b>Negligible Effect</b> No on-site disturbance related to foot traffic, no removal of eggs or reduced hatching success, no stress-related effects to adult gulls.	<b>Minor Effect</b> Limited on-site disturbance related to foot traffic once each year, slightly reduced hatching success (4% less), slightly increased corticosteroid level in adult females due to relaying efforts.	<b>Minor Effect</b> Limited on-site disturbance related to foot traffic twice each year, slightly reduced hatching success (6% less), slightly increased corticosteroid level in adult females due to relaying efforts.
<b>Other Cliff/Ground-Nesting Birds</b>	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.	<b>Negligible Effect</b> Slight disturbance related to foot traffic once each year.	<b>Negligible Effect</b> Slight disturbance related to foot traffic twice each year.
<b>T&amp;E Species: Sea Lions</b>	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.
<b>Harbor Seals</b>	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.	<b>Negligible Effect</b> No disturbance related to foot or vessel traffic.
<b>Wilderness</b>	<b>Negligible Effect</b> No human activity.	<b>Negligible Effect</b> No structures; limited, short-term evidence of human activity.	<b>Negligible Effect</b> No structures; limited, short-term evidence of human activity.
<b>Ethnographic Resources</b>	<b>Major Effect</b> Egg harvesting traditions would be lost for current and future generations. Few opportunities to interact with traditional homeland in a culturally appropriate way.	<b>Minor – Moderate Beneficial Effect</b> Egg harvesting traditions would be maintained by a small number of living Huna Tlingit and by a smaller number of future Huna Tlingit for several generations. Limited opportunity for harvesters to interact with traditional homeland in a culturally appropriate way.	<b>Moderate – Major Beneficial Effect</b> Egg harvesting traditions would be maintained by a moderate number of living Huna Tlingit and by a moderate number of future Huna Tlingit for many generations. Several opportunities for harvesters to interact with traditional homeland in a culturally appropriate way.

This Page Intentionally Left Blank