



Alaska Food Policy Council

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BLM Anchorage District Office
Attn: Racheal Jones
4700 BLM Road
Anchorage, Alaska 99507

RE: Alaska Food Policy Council Support of Alternative A (No Action Alternative) in the ANCSA 17(d)(1) draft EIS

Dear Ms. Jones,

On behalf of the Alaska Food Policy Council, I am submitting the following comments on the Bureau of Land Management's (BLM) Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) Withdrawals Draft Environmental Impact Statement. We strongly support and appreciate the BLM's full assessment of the 2021 Public Land Orders (PLOs), especially the inclusion of Tribal consultation, in consideration of opening ANCSA (d)(1) lands.

The Alaska Food Policy Council (AFPC) is a nonprofit organization committed to making improvements to Alaska's food system. We are one of the only organizations working statewide, across sectors, to improve Alaska's food system. Over 175 agencies and individuals representing Federal and State agencies, Tribal entities, schools, University programs, farmers, fisheries, and food systems businesses are members of the AFPC. Our collective experiences and organizational mission, to create a healthier, more secure, and more self-reliant Alaska by improving our food system, guide our comments on the ANCSA 17(d)(1) Withdrawals Draft EIS.

We believe the draft EIS has substantially captured the impacts of the action alternatives. We want to highlight and **emphasize the statewide importance and vulnerability around food security for Alaskans. We believe all of the action alternatives will clearly adversely impact food security for our rural communities, and as such AFPC can only support Alternative A (no action alternative).** Our comments cover two main areas:

- The critical valuation of food security and subsistence access to Alaskans across the analysis area, suggesting several additional resources to consider; and
- The need to address a scoping comment and concern around reindeer grazing under the

proposed action alternatives.

Additional Resources and Considerations Around Subsistence Access and Food Security

While the draft EIS includes numerous statistics on the importance of subsistence harvests for Alaskans, we want to highlight three additional resources when considering food security - the Alaska Food Security and Independence Task Force 2023 Report¹, the Alaska Food Security Action Plan², and Feeding America's Minding the Meal Gap 2023 report³. An excerpt from the Food Security and Independence Task Force Report highlights the importance of subsistence harvests for rural Alaskans,

“Presently, the primary source of local food in the state of Alaska is from the harvesting of wild foods...To replace the food-value provided by subsistence harvests alone, would cost anywhere from \$450-\$900 million annually by different estimates...The most recent harvest records provided by the Alaska Department of Fish and Game (ADF&G) estimate approximately 36.9 million pounds (usable weight) of wild foods are harvested annually by rural residents (excluding wild plant products)...”

Over 325 Alaskans participated in the creation of the 2022 Alaska Food Security Action Plan. Goal Three, Objective Two of this statewide Action Plan is to support food justice for Alaska Natives and improve Tribal collaboration and engagement. The first two strategies to meet this objective are to protect subsistence rights, and support tribal food system development (pg 32). The action alternatives within the draft EIS are in contradiction to this objective.

The third resource we ask you to consider is the Feeding America national report on food insecurity across the United States. In 2021, Kusillvak Census Area in Alaska ranked #2 **nationally** of counties with the highest rates of food insecurity. The vast majority of the analysis area covers populations that have documented high rates of food insecurity.

An excerpt from page 3-157 in the draft EIS “Environmental Consequences” section reads:

“Therefore, any of the action alternatives would have mixed effects on food security, nutrition, and subsistence. Although the action alternatives may decrease the availability of subsistence resources or access to them, and adversely affect nutrition, food security,

¹ University of Alaska Fairbanks, Alaska Food Policy Council, 2022 Governor's Task Force on Food Security & Independence (2023)

² 2020-2022 USDA Regional Food System Partnership Planning Grant: Statewide Food Systems Action Plan (2022)

³ Gundersen, C., Strayer, M., Dewey, A., Hake, M., & Engelhard, E. (2023). Map the Meal Gap 2023: An Analysis of County and Congressional District Food Insecurity and County Food Cost in the United States in 2021. Feeding America.

and cultural continuity, it would also increase employment and income, which would have beneficial effects on residents' ability to engage in subsistence activities and increase the ability to purchase foods from the store, thus reducing food insecurity."

We believe this suggestion **is not substantiated in the EIS, and is inappropriate** given the magnitude of cultural significance of subsistence foods and the vulnerability of Alaska's supply chains. **The preponderance of evidence clearly indicates that a reduction in subsistence access will have a negative impact on food security, nutrition, and subsistence.**

Scoping Comment Not Addressed RE: Reindeer Grazing

In the December 2022 Public Scoping Report, Chapter 3.24.3 a commenter asked for input from BLM around reindeer grazing in the proposed areas under consideration. The draft EIS does not appear to have addressed this comment, and **we request BLM to consider this comment and publish the potential impacts on reindeer grazing across the analysis area.** The reindeer industry has a vibrant history in the Bering Straits region, and is actively looking to an even brighter future. It is imperative that the EIS addresses this concern.

In summary, the Alaska Food Policy Council believes that the draft EIS has largely taken into consideration the negative impacts on food security across the analysis area, however, there are several key exceptions that must be considered and included as outlined above. Finally, we fully support Alternative A, the no action alternative, to protect subsistence access and not further negatively impact food security for rural Alaska.

Thank you again for the opportunity to comment on this draft EIS.

Sincerely,

A handwritten signature in black ink that reads "Robbi M. Mixon". The signature is written in a cursive, flowing style.

Robbi Mixon, Executive Director
Alaska Food Policy Council