



Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 - 6199



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

OSM.A24090

Month date 2024

Rebecca Skinner, Chair
Kodiak/Aleutians Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Skinner:

This letter responds to the Kodiak/Aleutians Subsistence Regional Advisory Council's (Council) fiscal year 2023 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to respond to these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of the issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

1. Researching the cause of the Sockeye Salmon run collapse in the Buskin River

The Council has deep concerns regarding the alarming decline of the Sockeye Salmon run in the Buskin River, Kodiak, especially since 2020. The Buskin River is the primary subsistence salmon area for many Kodiak residents. Disturbingly, Sockeye Salmon, Pink Salmon, and Dolly Varden Char have been discovered lifeless along the Buskin's riverbanks before completing their spawning cycle in recent years. The Buskin River was closed to fishing for Sockeye Salmon in 2018–2023 due to insufficient escapement returns and, more recently, due to premature death of salmon before spawning. Limited research has been undertaken to ascertain the underlying cause of this collapse. The Council recommends that funding be allocated via FRMP or other Federal or State agencies to facilitate comprehensive research on the Buskin River. This research should aim to better identify the causes, contributing to the decline in these critical salmon resources and seek to devise potential solutions to reverse this troubling trend.

Response:

Thank you for writing the Board about this topic. It is also concerning to the Board to hear that the Buskin River, which is the primary subsistence salmon area for many Kodiak residents has had lifeless Sockeye Salmon, Pink Salmon, and Dolly Varden Char found along the riverbanks before completing their spawning cycle in recent years. The Board recommends inviting state and federal agencies to upcoming meetings to share information about these species that would include both local knowledge and research projects. The Board has been informed that the Buskin River Sockeye Salmon run has been strong this year and is pleased to hear that. The Board also recommends that your Council review and update its FRMP priority information needs to reflect this concern and encourage proposals that aim to better identify the causes contributing to the variability of critical salmon resources and possible sources of freshwater mortality in both salmon and nonsalmon species in the Buskin River.

2. Effects of invasive species on subsistence resources and the need for eradication research

The Council expresses concern over the escalating presence of invasive species, notably the Signal Crayfish (Pacifastacus leniusculus), which are non-native to Kodiak Island. These species, present in Buskin Lake, have been identified as a potential threat to salmon habitat in the Buskin River and various parts of Kodiak Island and are competing against native species. Additionally, a multitude of other invasive species have established themselves on the Kodiak Island and across the Kodiak/Aleutians Region.

While reporting programs for invasive species exist, there is a notable lack of research and eradication efforts. The Council emphasizes the need for increased attention, especially in instances where these invasive species pose a threat to salmon runs and other subsistence resources. Urgent consideration is required for funding research initiatives and implementing effective and safe eradication programs to safeguard wild resources especially those utilized for subsistence.

Response:

The Board thanks your council for sharing concerns about the Signal Crayfish, which are non-native to Kodiak Island. We shared your concern with the U.S. Fish and Wildlife Service and learned about the work they are doing with many partners to address Buskin River watershed Invasive Species Control of reed canary grass (*Phalaris arundinacea*) and Signal Crayfish (*Pacifastacus leniusculus*).

The Kodiak Soil and Water Conservation District (KSWCD) and the Kodiak National Wildlife Refuge (KNWR) have worked to contain reed canary grass in the Buskin watershed near Lake Louise to prevent the plant from spreading and dominating riparian and estuary habitats with

thick mats. Signal Crayfish in Buskin Lake pose a serious threat to salmon eggs and juveniles. KSWCD completed early assessment work and Sun'aq Tribe's Natural Resource Department now manages Tribal Wildlife Grants (from the U.S. Fish and Wildlife Service) to monitor and control Signal Crayfish in the Buskin Watershed. Below are the details of the partners and projects.

Partners: Sun'aq Tribe of Kodiak, KSWCD, KNWR, Alaska Department of Fish and Game, U.S. Coast Guard

- Coastal Program (2011 – 2018), Tribal Wildlife Grants (2017 – 2026)
- Assessment, Research, Integrated Pest Management Plans
- Eradication and Control of reed canary grass and Signal Crayfish

2016 – 2026 Sun'aq Tribe Natural Resource Department Signal Crayfish work:

- Signal crayfish capture and removal, with an emphasis on all age classes
- Carbon and nitrogen isotope analysis to determine crayfish diet
- Snorkeling, eDNA, acoustic tagging, mark-recapture, trapping, and electrofishing to determine population extent
- Outreach to U.S. Coast Guard families and personnel, school district, and Tribal Citizens. Hosted Community Crayfish Derby
- Recent open-water and drysuit SCUBA certifications now enable Sun'aq staff to reach every part of the Buskin Watershed while hunting crayfish

Buskin Lake Signal Crayfish Timeline

- Time Immemorial – Buskin River has been an important subsistence salmon resource (archaeological evidence so far has been dated to at least 7500 years of habitation in this area and salmon consumption).
- 1999 – the local general store (which had a substantial aquarium/fish/crayfish selection) went out of business and closed.
- 2002 – Invasive Signal Crayfish reported in Buskin Lake (a molt was observed near the Outlet).
- 2003 – Rumors had started about live crayfish being seen in the Buskin. ADF&G high school Sport Fisheries interns were tasked with setting minnow traps to capture crayfish. Not successful.
- 2010 - Sun'aq Tribal Council resolution detailed the Tribe's commitment to preservation, protection, proactive promotion of Alaska Native subsistence activities.
- 2011 – a high school student captured a couple adult crayfish and brought these to his science teacher. Shortly thereafter KSWCD became involved with outreach and attempting to capture crayfish.
- 2012, 2013, and 2014 – Occasional specimens were captured by public and ADF&G weir workers near lake outlet.
- 2015 – KSWCD first successfully trapped crayfish. First female with eggs was captured in June of 2015.

- 2016 - Natural Resource Department of Sun'aq began monitoring and developing survey and capture methods for signal crayfish with support from BIA and FWS Tribal Wildlife Program.
- 2020 – Sun'aq efforts switched from research and monitoring to eradication and control efforts with Signal Crayfish.
- 2021 – Alutiiq Language Elders Council gave Signal Crayfish an Alutiiq name. “Sisurturta” means “fish-egg-eater.”
- 2021 – Kodiak Island Borough worked with Sun'aq to officially declare Signal Crayfish an “Invasive Species.”
- 2018, 2021, 2022, and 2023 – Sockeye Salmon subsistence fishing closures due to declining returns.

We encourage your Council to invite the organizations listed above to submit additional reports to the Council in advance of upcoming meetings so that you can learn more about funding and implementation of current and possible future projects to address invasives in Kodiak.

3. Concerns regarding exclusion from the statewide consultations and Alaska co-stewardship talking circles.

The Council raised concerns in their FY-2022 annual report about being excluded from the Department of the Interior listening sessions and consultations held in January 2022, in many regions of Alaska other than the Kodiak/Aleutians Region, regarding a potential relocation of the Office of Subsistence Management to the Office of the Assistant Secretary of Indian Affairs. This issue, along with the additional concern of the Council and the Kodiak/Aleutians Region being left out of the U.S. Fish and Wildlife Service (USFWS) sponsored Alaska Co-stewardship Talking Circles, conducted from October 2022 to early April 2023 was reiterated during the Council's fall 2023 meeting in King Cove. Frustrated by the lack of inclusion and inadequate responses from the Board to their concerns, the Council sent a letter to the Board about this topic in late fall 2023 and requested the Board forward the letter to the Secretary of Interior (enclosed). The Interagency Staff Committee (ISC) discussed the Council's concerns during their November 2023 meeting and decided to recommend to the Board to elevate the Council's concerns to the Secretary.

Response:

The Board, understanding the frustration expressed by the Council, supported forwarding your letter to the Secretaries of the Interior and Agriculture. We concur with the Council's sentiment that your Council, as well as all Subsistence Regional Advisory Councils, should actively participate in relevant Department of the Interior consultations affecting subsistence and Alaska communities. The letter was forwarded to the Secretaries on February 9, 2024, through the official channels (Topic 3 Enclosures). The Board is waiting for the response. In the meantime, OSM reached out to the U.S. Fish and Wildlife Service who acknowledged that they understand

your frustration and will do better in the future. They agree that your Council and people in your region have incredible value to add to these processes.

4. Support of the King Cove Road land exchange for residents' safety and access to subsistence resources

The Council fully supports the proposed land exchange facilitating road access from King Cove to Cold Bay airport for enhanced safety and access to subsistence resources. This matter was addressed in our FY-2022 annual report, acknowledging the Board's lack of decision-making authority on the issue. However, legitimate safety and food security concerns for King Cove residents arose during the fall 2023 Council meeting, where testimony from several residents was heard. At the meeting, the USFWS requested the Council's input on a supplemental draft Environmental Impact Statement (EIS) for the proposed land exchange between the Izembek National Wildlife Refuge and King Cove Native Corporation. The goal is to establish a road through the Refuge, providing a more efficient and safer means for King Cove residents to reach Cold Bay airport during medical emergencies. The Council would like to make the Board aware that after hearing the public testimony on this topic, the Council submitted a letter (enclosed) containing six recommendations to the Alaska Regional Director for USFWS to be included as public comments in the draft EIS. The Council advocates for moving forward with the land exchange to address the community's needs.

Response:

Thank you for informing the Board about your Council's position on the King Cove Road land exchange and submitting your recommendations to the Alaska Regional Director for the USFWS. We additionally want to thank you for advocating on behalf of the King Cove community. The Board will request the USFWS to keep the Council updated on the EIS progress and encourage your Council to keep the USFWS informed of your upcoming meeting dates so that they may provide reports during your meeting.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts and am confident that federally qualified subsistence users of the Kodiak Aleutian Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

Enclosures Topic 3 Encl 1 – FSB Transmittal Letter to SOI re KARAC Exclusion
Topic 3 Encl 2 – R3 KARAC Ltr of Exclusion to FSB
Topic 3 Encl 3 – Talking Circles Flyer
Topic 3 Encl 4 – Email Re Southwest Alaska Co-stewardship

cc: Kodiak/Aleutian Subsistence Regional Advisory Council
Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record