



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



In Reply Refer To:
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Richard Greg Encelewski, Chair
Southcentral Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Encelewski:

This letter responds to the Southcentral Alaska Subsistence Regional Advisory Council's (Council) Fiscal Year 2024 Annual Report. The Federal Subsistence Board (Board) appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of 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. Reevaluation of the criteria for the Fisheries Resource Monitoring Program

The Fisheries Resource Monitoring Program (FRMP) was established to identify and provide information needed to sustain subsistence fisheries on Federal public lands for rural Alaskans. The northern ecosystems are changing at an accelerated rate, and the number of subsistence issues and concerns as well as incidents of user conflicts are increasing exponentially. Therefore, the Council strongly believes that the FRMP should evolve to better meet these challenges. The Council would like to see the FRMP updated to better suit the changing climate conditions and federally qualified subsistence users' needs. In particular, the FRMP should fund research on marine resources and contaminants.

The Southcentral Region contains more than half of the state's population. The federally qualified subsistence users that call this region home depend upon foods that require a healthy marine environment. This includes shellfish, seaweed, shorebirds and eggs, marine mammals, and marine and anadromous fish. Many of these resources are also utilized by non-federally qualified users and marine commercial fishing operations. The high population in the urban centers in the region also means continued land development and infrastructure expansion that are occurring to support this population. The Council is concerned about ground and water contaminants from development and industry leaching into the ecosystem and becoming part of

the food web. If federally qualified subsistence users from this region cannot trust subsistence foods to be free of contaminants and healthy for regional users to consume, then this is a food security issue, which should be addressed through the FRMP.

The inability to submit projects on most marine and contaminant topics for funding consideration under the FRMP significantly hamstrings the Southcentral Region – focusing on only freshwater topics limits support for projects of great concern to this region’s subsistence needs.

Recommendation:

The Council requests the Board direct OSM to review if the current FRMP requirements meet current subsistence users’ needs across all regions. If barriers, such as the lack of ability to request funding on marine or contamination topics exist, the Council request the Board examine how these barriers can be removed or modified to better suit the needs of the regions.

Response:

The FRMP was developed under Section 812 of the Alaska National Interest Lands Conservation Act (ANILCA), which authorizes research on fish and wildlife subsistence uses on Federal public lands and waters. The focus on stock status and trends and traditional knowledge and practice directly informs us in our fisheries regulatory decision-making.

Some research is not eligible for FRMP funding, including contaminants (assessment, evaluation, and monitoring), habitat (protection, mitigation, restoration, and enhancement), and hatcheries (propagation, restoration, enhancement, and supplementation). These kinds of research projects are typically funded by land management or regulatory agencies, which already have direct responsibility and specific programs to address those activities. As such, proposals with priorities that fall under these topics have not been eligible for funding to prevent duplication of efforts. However, if the Council is interested in research on contaminated related impacts on subsistence activities, we will ask OSM to review the FRMP guidelines and share information back with the Council at a future meeting.

Federal jurisdiction over marine waters within Federal conservation units is limited and specific. The FRMP’s scope is constrained by ANILCA to focus specifically on subsistence uses and management and must directly inform decision making on sustainable harvest and fish population status within Federal jurisdiction. Notable Federal conservation units in Alaska with marine waters within their boundaries include Alaska Maritime National Wildlife Refuge, Glacier Bay National Park and Preserve, Kenai Fjords National Park, Katmai National Park and Preserve, Cape Krusenstern National Monument, and Bering Land Bridge National Preserve. However, not all of these areas are open to subsistence, so funding for marine research is limited through this program.

2. Review the effects of the Chitina Subdistrict Personal Use Fishery on subsistence fishing opportunities and Chinook and Sockeye salmon returns

Ensuring the viability of salmon that return to the Copper River drainage is of utmost concern to this Council. This Council would like to acknowledge that it is important for all Alaskans to be able to harvest food for their families, but these practices should not be done to the detriment of federally qualified subsistence users' needs.

This Council is concerned with the ever-growing Chitina Personal Use Salmon Fishery that is conducted in the Copper River. This concern was highlighted after FP21-10 was submitted, which requested the creation of a federal dip net season near the mouth of the Copper River. This created discord between some federally qualified subsistence users in the Southcentral Region, which is downriver of the personal use fishery, and the Eastern Interior Region, which is upriver of it. Public testimony was heard that a new fishery in the lower river would further reduce the number of salmon available for those federally qualified subsistence users who reside in the upper portions of the Copper River. Federally qualified subsistence users should not be fighting amongst themselves over allocation of subsistence resources when non-federally qualified users are harvesting the bulk of the salmon in the drainage.

Recommendation:

The Council would like the Board to be briefed on the growing Chitina Personal Use Salmon Fishery that is conducted on the Copper River and managed by the Alaska Department of Fish and Game (ADF&G). The Council also requests that the Board consider any actions to help mitigate the impacts of this fishery on federally qualified subsistence users and on the long-term viability of salmon in this river for continued use.

Response:

The Wrangell-St. Elias National Park and Preserve submitted [Proposal 51](#), to address concerns heard from subsistence users fishing in the most upstream harvest locations of the Copper River. The Alaska Board of Fisheries adopted proposal 51 with amendment [RC122](#) in December of 2024. This action delays opening the Copper River District commercial fishery until May 22 at the earliest, delays opening the Chitina personal use dip net fishery until June 10 or later and prohibits the retention of Chinook Salmon in the personal use fishery until after June 30. These changes in fisheries regulations protect the early salmon runs, which tend to be comprised of greater numbers of Chinook Salmon, along with higher numbers of Sockeye Salmon stocks bound for the uppermost spawning tributaries of the Copper River.

Additionally, managers and researchers on the Copper River are working to compile existing baseline information on Copper River salmon and discussing shared management and research priorities. A salmon workshop led by the University of Alaska Fairbanks and the Prince William Sound Science Center was held at the Wrangell-St. Elias National Park and Preserve Visitor Center in Copper Center in February 2025. Copper River salmon biology, ecology, and management, including life cycles, migration timing of individual stocks over time, and management approaches were identified. A follow up workshop to create a shared vision,

confirm research priorities, and identify adaptive management approaches for the future is planned for fall of 2025 in Cordova.

Understanding the impact of the State's Chitina Subdistrict Personal Use Fishery on upriver federally qualified subsistence users and on Chinook and Sockeye salmon returns is difficult, since there are no sonar counts being conducted upstream of the Chitina fishery. However, OSM staff will reach out to ADF&G to request a briefing to the Board and the Council on the current use, effort, and harvest in the Chitina Subdistrict Personal Use fishery.

Other Annual Report Topics for Information Purposes Only

The Board thanks the Council for sharing information in your FY-2024 Annual Report on other issues significant to your region and subsistence users, (3) concerns over difficulty in navigating the process to acquire Ceremonial Harvest Permits for shrimp used at potlaches in the Prince William Sound; (4) concern over Chinook Salmon and need for information on the listing process under the Endangered Species Act; (5) concerns over the effects of changing environmental conditions, such as paralytic shellfish poisoning and ocean acidification; and (6) alarming depletion of the Southcentral Region's subsistence resources.

We appreciate and value the traditional knowledge, observations, and expertise you share. With this information, we are better prepared to make informed decisions.

In closing, we want to thank you and your Council for your continued involvement in the Federal Subsistence Management Program and the work you do on behalf of federally qualified subsistence users. We appreciate your efforts and are confident that federally qualified subsistence users of the Southcentral Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

cc: Southcentral Alaska 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