



Federal Subsistence Board

Office of Subsistence Management
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Anchorage, Alaska 99503 – 6199



In Reply Refer To:
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Jack Reakoff, Chair
Western Interior Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Reakoff:

This letter responds to the Western Interior 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. Subsistence Users Continue to Bear the Brunt of Salmon Conservation in the Yukon and Kuskokwim Drainages

The Council grows increasingly frustrated with Federally and State managed commercial fisheries impacting Federally Qualified Subsistence Users (FQSU) ability to meet subsistence needs. Specifically, the North Pacific Fishery Management Council's (NPFMC) management and regulation of commercial fishing operations during the Bering Sea and Aleutian Island (BSAI) pollock trawl fishery, and the Alaska Department of Fish and Game (ADF&G) and the Board of Fisheries (BOF) management and regulation of commercial fishing operations in the South Alaska Peninsula (Area M) commercial salmon fishery.

In 2024, returns of Chinook and Chum salmon in the Yukon River were yet again catastrophically low, resulting in virtually no subsistence salmon harvest opportunities. The salmon returns on the Kuskokwim River were slightly better but did not allow for subsistence needs to be fully met for either of these species. Yet commercial salmon fishing continued to occur in the marine environment, where salmon bound for the Arctic, Yukon, and Kuskokwim drainages (AYK) were caught and discarded as bycatch in the BSAI fishery, or incidentally caught and subsequently sold in Area M fisheries. While salmon stocks continue to fail to meet

escapement goals in most of the AYK, much less meet FQSU subsistence needs, or meet international treaty obligations in the case of the Yukon River.

The regulation changes to the BSAI fishery the NPFMC initiated to reduce the number of salmon caught and subsequently discarded as bycatch is not a good faith effort, and by no means is a balance of conservation between the BSAI trawl fleet and FQSU. The NPFMC needs to take significant action that will provide actual protection to salmon stocks to allow these stocks to begin rebuilding. This includes modifications to trawl timing, gear modifications, and enforcing the fleet's requirement to not let trawl gear operate on the ocean floor.

The regulation changes that the BOF enacted during their March 2023 meeting to reduce the impact of marine interception of AYK stocks is also not a good faith effort and is also not a balance of conservation between the State managed commercial fishing fleet in Area M and FQSU. The BOF discussion of a very publicly supported regulatory proposal to reduce the amount of time commercial fishermen had to fish during times of known higher AYK bound salmon in this mixed stock fishery was concerning, as the BOF commented that the fleet had started to 'police themselves' and should be allowed to continue to do so without the BOF enacting additional regulations. During the 2023 commercial fishing season in Area M, nine citations were issued to captains and crew members who were observed discarding non-targeted salmon species to circumvent the non-target salmon cap, and in the 2024 season, the number of citations issued "surged" with "most [citations] written to fishermen harvesting in closed waters or during a closed period"¹. Yet these are the fishermen who are volunteering to limit when they fish to allow passage of AYK bound salmon during legal fishing openers. This is the definition of a fox watching the henhouse.

The Federal government is under obligation under ANILCA to prioritize subsistence needs, and the State is under a similar obligation under its state constitution, as well as to manage salmon under sustained yield management. Yet both the Federal and State government are failing to meet these obligations. The NPFMC and the BOF need to take significant action now that will provide actual relief to AYK bound salmon stocks to allow them to begin to recover and rebuild, instead of being caught and sold for profit in the commercial market or dumped over the side of fishing vessels.

Both the Federal and State government are also hindering native salmon stock recovery in a different way. The Federal government by lack of action regarding international hatcheries, and the State government by allowing over release of hatchery salmon into Alaskan waters. The hatchery salmon reduce the amount of food that wild stock salmon can find, reducing their overall fitness. The Department of the Interior (DOI) needs to fully understand the detrimental nature of hatchery releases in the current ocean environment, which other nations release, and how much, Pacific salmon, how many are being released, and where these salmon rear in the marine environment so that discussions may begin with these other nations about the formation

¹ Stewart, Carli. "Citations Surge During Bristol Bay Sockeye Season." National Fisherman, 11 July 2024, <https://www.nationalfisherman.com/citations-surge-during-bristol-bay-sockeye-season>. Accessed 13 December 2024.

of an agreement to severely reduce salmon hatchery production and release. The State needs to also rein in the amount of hatchery releases that are currently permitted. The current practice by both other nations and the State is not sustainable to the continuation of healthy wild salmon stocks in the North Pacific and Bering Sea.

Recommendation:

The Council requests that the Board remind the Federal government and applicable agencies of its ANILCA mandate to prioritize subsistence, and to begin to formulate how an international discussion can start over capping international hatchery production. Additionally, the Council requests that the Board encourages the State to recall its constitutional mandate to prioritize subsistence and sustained yield.

Response:

Each of the Yukon Region Councils has worked to bring these salmon related concerns forward in multiple venues, and we thank you for those efforts. We hear and acknowledge your frustrations and concerns. We also acknowledge that bycatch of AYK bound salmon continues at a time when subsistence fisheries have been restricted or closed and when escapement goals and treaty obligations are not being met. We will relay your concerns to the current Secretaries as we await their direction.

In relation to communications with the State, Executive Order 14153 “Unleashing Alaska’s Extraordinary Resource Potential” and the corresponding DOI Secretarial Order 3422 both direct meaningful consultation with the State fish and wildlife management agencies. As such, OSM has increased discussions with the State regarding our shared responsibilities and how to improve lines of communications and opportunities for subsistence users. We are hopeful that these will bring forth positive discussions around subsistence as the priority consumptive use of fish and wildlife resources.

2. Continued Concern with the Lack of Data on Regional Non-Salmon Populations

Due to the continued poor run strength of multiple species of salmon into the Yukon and Kuskokwim rivers, FQSUs continue to rely heavily on nonsalmon species such as whitefish, Northern Pike, and Long Nosed Suckers to meet subsistence needs. Little is known of the population or harvest thresholds for these fish in either system. It is concerning to the Council that the people of the Yukon and Kuskokwim could unintentionally overharvest and damage the fitness of these populations while waiting for salmon runs to improve. The Council has previously voiced this concern and will continue to do so until more progress is made on this topic.

Recommendation:

While the Council will continue to utilize the priority information needs through the Fisheries Resource Monitoring Program (FRMP), the Council would like the Board to review how much research on these species has been funded by the FRMP as the Board formulates a reply to the Council, so they are aware of what has, and has not, been done.

Response:

We share your concerns about the health of non-salmon populations in the Yukon and Kuskokwim rivers. Reliable population assessments and harvest data for these non-salmon species are essential for effective management.

We have reviewed the research on non-salmon species funded by the Fisheries Resource Monitoring Program (FRMP) (see enclosure). There have been few studies examining non-salmon populations during the recent declines in salmon; however, there has been foundational research conducted in both the Yukon and Kuskokwim drainages since the FRMP began in 2000. We appreciate your ongoing efforts to use the FRMP to enhance our understanding of non-salmon species population dynamics and harvest trends and encourages you to continue to highlight this non-salmon fish concern in the biennial priority information need development process. The information from these studies is critical for preventing overharvest and continuing subsistence harvest opportunities of non-salmon species populations.

3. Creation of a Yukon and Kuskokwim Fish Commission

The Council has expressed concern over the lack of salmon available to subsistence users and over the impact of a higher reliance on nonsalmon species in AYK drainages, and concern over commercial marine fisheries managed by both the State and Federal government that harvest salmon bound for the AYK in this, and past Annual Reports. Additionally, the Council has sent individual and/or joint Council letters to the Board, the North Pacific Fishery Management Council, and the ADF&G and the BOF with concerns and requests for action in this time frame as well with little to show for it. The Council believes that the next step is to create a Yukon and Kuskokwim Fish Commission so that the subsistence users in these drainages can build a stronger voice with our concerns and our requests, and to share information, ideas, and concerns more readily between the two drainages.

Recommendation:

The Council requests the Office of Subsistence Management and Board to assist with the creation of this commission.

Response:

We thank your Council for inviting the Yukon River Inter-Tribal Fish Commission (YRITFC) and the Kuskokwim River Inter-Tribal Fish Commission (KRITFC) to yours and the Eastern Interior Alaska Subsistence Regional Advisory Council's Winter 2025 meetings. We commend

both commissions for attending and giving organizational updates that included information on leadership and staffing, advocacy and outreach, research and monitoring, and taking questions from Council members.

Additionally, both the KRITFC and the Tanana Chiefs Conference have attended meetings of various Councils interested in this issue. They have conducted outreach as part of their role as cooperating agencies in the development of the preliminary draft Environmental Impact Statement (EIS) for proposed amendment to the Fishery Management Plan for Groundfish for the Bering Sea/Aleutian Islands Management Area/Bering Sea Chum Salmon Bycatch Management. We see this effort as a productive step towards building collaboration between the two organizations and a stronger voice that addresses shared concerns in the both the Yukon and Kuskokwim regions.

Working collaboratively in Western Alaska is valuable, and we look to the two fish commissions to determine if, when, and how they can best work together to continue to build a strong voice for advocating on behalf of subsistence fishers concerns and to share information, ideas, and solutions more readily between the two drainages. We encourage your Council to continue to invite both the YRITFC and KRITFC to share organizational updates during the reporting section of your meeting agenda as well as to spend time sharing ideas from your Council on how best to work together to address the lack of salmon available to subsistence users.

4. Creation of a Memorandum of Understanding between the Department of Commerce, the DOI, and the Department of Agriculture Concerning Commercial Fishing

The Council would like a Memorandum of Understanding (MOU) to be created between the DOI, the Department of Agriculture (DOA) and the Department of Commerce (DOC) regarding commercial fishing where AYK bound salmon are caught. As marine commercial fishing continues to occur when FQSU are unable to even put a net in the water, the subsistence priority outlined in ANILCA is not being adhered to. This continued lack of action by the Federal government is jeopardizing FQSU ability to harvest wild salmon that have been utilized for millennia. This lack of action is also jeopardizing the sustainability of salmon culture in these drainages as with the lack of salmon there is no opportunity to pass along knowledge of where and how to fish for salmon, and when and how to process salmon to the next generation - subsistence fishing is so much more than how many fish were harvested. Also in jeopardy is the future viability of these salmon stocks for future generation. ANILCA is not an act that only applies to the DOI and DOA, but all Federal agencies, and all federal agencies should recognize this mandated subsistence priority.

Recommendation:

The Council wishes the Board to request that the Secretary of DOI, DOA, and DOC gather to discuss establishing a MOU concerning the protection of salmon bound for the AYK.

Response:

We recognize that much of this report is centered on concerns for salmon and that you are doing all within your ability as a Council and regional residents to take action. There are a multitude of impacts affecting salmon in fresh and marine waters. What occurs in marine waters is outside of Federal public lands and waters as defined in ANILCA. As stated in response to topic 1, we will relay your recommended strategy for the management of salmon to the Secretaries of the Interior and Agriculture.

5. Western Bound Salmon Genetic Information Collection and Availability

There is an imperative need for increased genetic monitoring for all commercial fisheries in the State and Federally managed marine waters of Alaska where salmon stocks headed for the AYK are caught. This should be done for both where salmon are targeted intentionally, such as in mixed stock intercept fisheries like what occurs in Area M, or unintentionally, such as in the BSAI fishery. These fleets are harvesting AYK bound salmon in a variety of methods and with different intentions, but the result is less of these salmon being able to return to their natal streams to meet escapement, much less be available for FQSU needs.

This information should then be compiled and made easily available to the public. While the Council acknowledges that these fisheries are managed by both State and Federal entities, they both need to be aware of what the other is doing so that they understand the full impact of their actions on Western bound salmon stocks. Current management by both means that essentially the right hand is not talking to the left. The Council also acknowledges that genetic monitoring is currently conducted by both entities, but finding the results in multiple different locations is difficult for the public.

Recommendation:

The Council will direct their Coordinator to continue to pursue having reports on this topic at upcoming Council meetings. The Council would like the Board to encourage a collaborative database where genetic information from marine commercial fisheries can be stored for review, and to have this database available for the public in locatable and understandable fashion.

Response:

We share your concern about the health of these vital salmon populations, but it is important to note that the Board does not have management authority over these fisheries or the ability to direct funding to establish a collaborative database.

However, we support the idea of enhanced communication and collaboration between State and Federal entities to ensure genetic monitoring data of Western bound salmon stocks are publicly available and easily accessible. We encourage you to continue advocating for accessibility of genetic monitoring results through the agencies responsible for managing the commercial

fisheries. Sharing this information is essential for effective management and safeguarding the future of salmon populations in the AYK region.

6. Concern with Transporter Operating in the Innoko Wildlife Refuge

The Council would like to draw the Boards attention to repeated concerns expressed at the Council's fall 2023, winter 2024, and fall 2024 meetings over activities of nonlocal hunters that are utilizing a transporter operating out of McGrath. This transporter is relatively new business owner in McGrath and is taking clients into the Innoko National Wildlife Refuge (INWR). A previous transporter had operated in this area, but did so on a much smaller, more sustainable scale that the community didn't not have concerns over. This current season it was reported to this Council that 100 clients were taken out by this one outfit.

While the INWR is only 40 nautical miles from McGrath, the Kuskokwim Mountains lay between them, and any weather event slows down the retrieval of moose and hunters from the field. During the fall hunting season, bad weather events are typical in this part of Alaska. In 2023 and 2024, the weather was bad long enough that to the extent that nonresident family members were reaching out to McGrath residents to assist in retrieving their loved ones from the field as the transporter was unable to retrieve hunters via plane. This delay caused meat to be in the field longer than anticipated with individuals who were unaware or unable to take proper care of it. When the weather did lift, all the hunters and their harvested meat returned to McGrath in a large influx. Limited space was available to properly store the influx of meat, and only one commercial meat processor in the community to assist in processing. Attempts were made to distribute some of the meat in the community, but most of it was not fit for dog teams by the time these efforts were made. Much of the meat ended up at the McGrath dump to be disposed of by the community again taxing McGraths resources and angering community members to see such waste especially for those individuals who were unable to harvest a moose in the fall.

Recommendation:

The Council was pleased to have Mr. Karlin Itchoak, US Fish and Wildlife Service (FWS) Assistant Director of Refuges, attend the fall meeting in Galena to speak to this concern. Additionally, the Council was glad to hear that the transporter in question is being investigated by federal wildlife agents, but it is unclear at this time if any charges resulted in this investigation, or if the transporter will be issued permits to operate in the INWR in the future. The Council requests that the Board direct the FWS to report to the Council the outcome of this investigation, as well as what steps are being done to ensure that these series of events does not continue to occur regardless of the end result of the investigation.

Response:

We are pleased to hear that Mr. Karlin Itchoak, FWS Assistant Regional Director of the National Wildlife Refuge System in Alaska and Jeremy Havener, also with Refuges and based out of Galena attended your Council's Fall 2024 meeting and were able to provide updates and to listen

and learn about this concern. Refuge staff informed us that they have been working on this issue. They will keep the Council informed when they have more information, but please understand that this is an active investigation, and they may be limited in what they can share. Your Council's first-hand knowledge of this issue is valuable, and the Board appreciates the time spent sharing information about this with Refuge staff over multiple years.

7. Continued Efforts to Finalize the Council's Sheep Management Strategy Guidelines

The Council continues to have concerns over reopening Federal public lands in Unit 24A and a portion of Unit 26B to sheep hunting. With the approval of Wildlife Special Action WSA22-02, the Board temporarily closed these Federal lands to all users through the wildlife regulatory year 2023–2024. This closure was enacted due to conservation concerns over the sheep population in these units, and the original special action request was submitted by this Council. The Council then submitted Wildlife Proposal WP24-26 to place the actions initiated by WSA22-02 into regulation, which is set to sunset in June of 2026. As previously noted, the Council would like to establish a management framework for when these units reopen to sheep hunting and wishes to establish these parameters in advance. For this reason, the Council drafted the Dall Sheep Management Strategy Guidelines (Enclosed). The Council has requested applicable Federal land managers review this document before it is submitted through the Annual Report Process to the Board during the upcoming wildlife regulatory cycle. The Gates of the Arctic Subsistence Resource Commission (GAAR SRC) is assisting in this endeavor. They requested Gates of the Arctic National Park staff to evaluate and prepare comments on this document for the spring 2025 GAAR SRC meeting. The Council feels that the region should utilize scientific data to better understand the status of Dall Sheep and assist in the recovery of this species.

Recommendation:

The Council requests that OSM use the Dall Sheep Management Strategy as a guideline while drafting future analyses for relevant proposals. The Council also asks OSM to distribute the strategy to relevant agencies when applicable. Additionally, the Council requests that the Board approve this plan and direct relevant agencies to review and follow this management strategy when sheep is discussed and management decisions are made.

Response:

Your Council took the initiative to make a recommended strategy for the management of sheep in your region and the Council may utilize this management plan in making its recommendations on proposals related to the taking of sheep in your region. The Board and relevant management agencies may consider this sheep management strategy if they so desire. The local knowledge included in the strategy is valuable and brings forward new ways to look at how best to manage sheep populations. We will consider your strategy as we make regulatory decisions on sheep proposals.

The GAAR SRC brought the strategy forward to GAAR staff and asked for their review and comments on the Strategy. GAAR staff submitted a response letter, which was discussed at the

April 16, 2025, GAAR SRC meeting. Based on the meeting discussion, the strategy will be modified and shared at the November 2025 SRC meeting for further discussion.

Other Annual Report Topics for Information Purposes Only

The Board thanks the Council for sharing information in your FY-2024 Annual Report on another issue significant to your region and subsistence users (8) concern over the Alaska Board of Game 2024 liberalization of the harvest limit for caribou in Unit 26B.

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 Western Interior Alaska Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

Enclosure

cc: Western Interior 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