

Eastern Interior Subsistence Regional Advisory Council

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In Reply Refer To:
RAC/EI.22007.KW

APR 13 2022

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Eastern Interior Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY2021 Annual Report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held via teleconference on October 14-15, 2021, the Council identified concerns and recommendations for this report. The Council approved this Annual Report at its March 8-9, 2022 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Eastern Interior Region.

1. Finding solutions for Yukon River salmon fisheries problems and better coordination between groups and stakeholders

The summer and fall 2021 fishing season on the Yukon River was one of the worst seasons for rural subsistence users. There were no subsistence harvests allowed for King (Chinook) Salmon and Summer/Fall Chum Salmon. Local subsistence fishers went without much needed salmon for their families and communities. Seeing that this issue crosses several regions in Alaska, the solutions that may come for Yukon River fisheries is going to depend on communication and coordination between various stakeholders. The Council encourages the Yukon River Drainage Fisheries Association, the Association of Village Council Presidents, Yukon River Inter-Tribal Fish Commission, and the Office of Subsistence Management (OSM) to work together to unify Yukon River people in order to make management decisions that would best serve the salmon fisheries on the Yukon River.

To support the recovery of Yukon River salmon stocks, the Council strongly recommends that the hard cap of Chinook Salmon bycatch in the Bering Sea Aleutian Islands fisheries be reduced to 10,000 Chinook Salmon and that a hard cap be put in place for no more than 150,000 Chum Salmon. Our Council, along with the three other Regional Advisory Councils with Customary

and Traditional Use determinations for salmon in the Yukon River, are submitting a joint letter to the North Pacific Fishery Management Council (NPFMC), imploring them to reduce bycatch hard caps as described above, add two subsistence/Tribal seats to the NPFMC, and implement 24/7 video monitoring aboard trawler vessels. Additionally, the Council strongly recommends that genetic mixed-stock analysis be undertaken for both Chinook and Chum salmon bycatch in the Alaska Peninsula Management Area (Area M) groundfish fisheries in order to monitor the proportion of bycatch, which comes from Yukon River salmon stocks. The Council plans to submit letters directly to Alaska Department of Fish and Game and the Board to recommend this research be prioritized.

2. Need for moose counts around Rampart and Nowitna River areas

Residents of the area surrounding Rampart and the Nowitna River, and the broader Interior region along the Yukon River, have been unable to harvest sufficient moose in recent years. Coupled with the extremely difficult fishing season, the lack of available moose contributes to larger challenges of food security in the region. The closure of Yukon River salmon fisheries requires an increased reliance on large land mammals, such as caribou and moose. The Council recognizes a need for better data on the moose population surrounding Rampart and the Nowitna River; such data is necessary for managing moose in this region in a way that supports increased reliance on large land mammals for subsistence. The Council requested population estimates for moose in Units 21B and 20F last year but has not yet received a report concerning this topic.

During the Council's fall 2021 meeting, Alaska Department of Fish and Game reported that they did not have new moose survey data and that they primarily relied on harvest numbers as a means of tracking moose populations in Unit 20F. The Department offered to compile data from moose population estimates in Nowitna National Wildlife Refuge to share with the Council at a later date.

The Council also received a report on a recent (2019) survey from Yukon-Charley Rivers National Preserve. The survey showed a 20% decrease in the local moose population from the previous 2015 survey as well as low population density (.28 moose/square mile). Yukon-Charley Rivers National Preserve is also documenting calving rates on 32 animals. While the timing of calving remained consistent, calving rates dropped from 95% in 2020 to 66% in 2021. The Council supports Yukon-Charley Rivers National Preserve plans to continue these survey efforts next year and in years to come.

The Council feels that, considering significantly reduced subsistence harvest opportunity, a comprehensive survey is necessary to assess the health of moose populations near Rampart and the Nowitna River and to ensure continued and increased subsistence harvest opportunity in the area.

3. Need for improvement of the Tribal consultation process and streamlining OSM processes

During the Council's meeting on October 14-15, 2021, as the Council was going through 2022-2024 Federal wildlife proposals, it was amply clear that consultation had not been conducted with Tribal governments who would be impacted most by various proposals. The Council has

concerns that Tribal councils in the region are not receiving proposal packets and therefore are unaware of these proposals, which leads to the absence of providing comments.

Tribal councils have been inundated by various meetings with information coming from a wide variety of agencies; therefore, it is important to bring Federal wildlife proposal information to their attention in a succinct and efficient manner. It has also come to the Council's attention that consultation letters on Federal wildlife proposals go out during the fall time when hunting season is in full swing. The OSM should reconsider their timeline for consultation as reaching out to Tribal governments during the fall hunting season is poorly advised. A strategy that works in smaller communities where people attend different land management meetings is to have cross-council/committee information sharing. Federal Regional Advisory Council members have the responsibility of sharing information with their communities through attendance at State local advisory committee meetings and other types of meetings.

4. Need for timely delivery of Federal Proposal Books

Many Council members received their copies of the Federal Subsistence Wildlife Proposal Book after the deadline for public comment on proposals. When Proposal Books are distributed this late, Council members are unable to familiarize themselves with proposals and discuss relevant proposals with other members of their communities prior to the deadline for public comment. This inhibits the public comment process, effectively preventing Council members from discussing proposals with their community in a meaningful way. The Council requests Federal Subsistence Hunting or Fishing Proposal Books to arrive long before the deadline for public comment, allowing sufficient time for Council members to make their communities aware of relevant proposals prior to closure of the public comment period.

5. Food security – more dependence on moose and caribou and allowing subsistence users to harvest non-salmon species

The recent Yukon River salmon fisheries collapse lead to a stronger reliance on moose and caribou. In addition, subsistence users shifted their fishing focus from salmon to non-salmon species as a subsistence resource that local people can begin adaptively utilizing during the summertime both as a cultural practice and for subsistence sustenance. The Council stresses that Yukon River non-salmon species have become a more reliable resource of growing importance and requests that Federal management agencies continue to allow harvest of non-salmon species for subsistence uses.

6. Concerns regarding parallel meetings scheduled

The Council is concerned about the scheduling of parallel Subsistence Regional Advisory Council meetings. Many Council members and agency staff need to attend multiple RAC meetings. This is extremely difficult to manage when multiple RAC meetings occur on the same day, especially in adjacent Regions. The Council requests that future RAC meetings be scheduled on separate days whenever possible.

7. Opposition to H.R.4716 - Refuge From Cruel Trapping Act of 2021

The Council is in complete opposition to the Refuge From Cruel Trapping Act of 2021 (H.R.4716), introduced in Congress by Rep. Jerrold Nadler of New York, which seeks to prohibit the use of body-gripping traps within the National Wildlife Refuge System. H.R.4716 is a direct insult to the way of life in Alaska and does not respect the protections provided to subsistence uses by the ANILCA. Trapping is an important tradition in the Eastern Interior region and throughout Alaska, and it remains a vital component of contemporary subsistence economies – many rural Alaska residents rely on trapping for income and raw materials. The same applies to trappers in the Lower-48 States, and therefore the Council is against this bill nationwide. The Council plans to submit a letter to the Board detailing our opposition and requesting that the Board forward our sentiments to Congress.

The Eastern Interior Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the Eastern Interior Region. If you have any questions regarding this report, please contact me via Katya Wessels, Supervisory Program Analyst, Office of Subsistence Management, at katerina_wessels@fws.gov, or 1-800-478-1456 or 907-786-3885.

Sincerely,



Sue Entsminger
Chair

cc: Federal Subsistence Board

Eastern Interior Subsistence Regional Advisory Council

Office of Subsistence Management

Interagency Staff Committee

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game

Administrative Record