

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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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 Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2020 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 6-7, 2020, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 3-4, 2021 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA, the Federal Subsistence Management Program engagement with subsistence communities, and the continuation of subsistence uses in the Yukon-Kuskokwim Delta Region when faced with environmental change.

**1. Request for the Board's support for rural subsistence priority**

The Council requests that the Board recognize and support the critical importance of rural subsistence priority. Our communities depend on subsistence resources for survival and it is the very fabric of our family and community. It is central to our culture and way of life. Subsistence foods and taking care of others, such as providing for our elders and sharing subsistence foods through the potlach, are central also to our traditional and cultural values. As provided for in ANILCA, subsistence priority should be recognized and supported over other uses. This is more critical now than ever with declining fish and wildlife populations and stress to the resource caused by climate change.

The Council has submitted several letters over the years requesting reduction in Bering Sea salmon bycatch and limitation of sport fishing on our tributary rivers – every fish counts to make escapement and provide for subsistence. The Council seeks the support of the Board to help ensure the burden of Chinook Salmon conservation is shared by all and protect subsistence priority over industrial trawl fisheries and sport fishing.

## **2. Recent food security issues and need for the Board's awareness and support**

Recent events have created real and urgent food security emergencies for subsistence communities across the Yukon-Kuskokwim Delta. Not only has the COVID-19 pandemic caused transportation lockdowns and resulted in food supply challenges for rural communities, but additionally the recent loss of regional airlines has greatly limited freight flights to bring food and supplies to these off-the-road-system communities. With bare shelves, we are more than ever dependent on access to fresh, healthy subsistence foods to sustain our families.

Salmon declines over the past several years and the 2020 total fisheries disaster on the Yukon and Kuskokwim rivers have left communities throughout the region with no dry or frozen fish for the winter. The year 2020 was one of the worst on record for subsistence communities – with very few fish in the river many people did not even catch one salmon to eat. The subsistence fishers took the brunt of the restrictions for conservation. The Council believes that everyone including all agencies need to be at the table to work towards conservation – from the Bering Sea feeding grounds to the headwaters' spawning grounds. The Council requests the Board recognize this as an emergency and find ways to provide food support and ensure access to subsistence resources that our communities need to survive and thrive.

## **3. Consideration for traditional ecological knowledge (TEK) when making subsistence resource management decisions**

Traditional ecological knowledge has been used by our elders and ancestors for generations. We have lived on this land from season to season, know what the weather brings, and study our surroundings to understand the cycle of life and the natural environment that sustains us. We grew up learning to observe, to listen to the stories of elders, and to have an in-depth relationship with and understanding of the environment of the place where our ancestors lived for generations. For example, when there is a lot of snow, there will be good fish because of the cold waters coming down stream; the length of the grass will tell you if it is going to be a cold winter; and abundant mosquitos is an indication of how the season to come will be. We are experts in our own land and waters and our traditional knowledge should be considered along with western science in management decisions affecting subsistence resources that we depend upon.

The Council requests that the Board, Federal Subsistence Management Program, and Federal managers of subsistence resources listen to local experts and knowledge holders and make decisions based on our traditional science gained from generations of observations as well as western scientific data. The Council also stresses that the engagement with subsistence communities and traditional knowledge bearers should come at the outset of research and management projects in the region – not as an afterthought as it often has been. We encourage the Federal subsistence program to continue to fund traditional knowledge studies, such as through the Fisheries Resource Monitoring Program in-season fisheries programs in partnership with local Tribes, formal documentation of traditional knowledge so that it can be used now and

preserved for future generations, and encourage increased traditional knowledge documentation and incorporation of TEK into management.

#### **4. Youth Science and Culture Camps**

The Council supports the Federal Subsistence Management Program and Federal land managers holding Youth Science and Culture Camps in collaboration with local area Tribes. These programs help instill an interest and learning about science, traditional knowledge and cultural values. We hope the Board sees the great benefit of these programs and continues to provide funding and support for the important role science and culture camps play in the conservation of subsistence resources for future generations.

#### **5. Mulchatna caribou herd and other inventory and monitoring studies**

The Mulchatna Caribou Herd is very important to subsistence communities of the Yukon-Kuskokwim Delta. The Council is very concerned about its decline and what may be causing this recent dramatic reduction in the size of the herd. The Council encourages the Federal Subsistence Management Program and agency biologists and managers to continue conducting population surveys and ongoing monitoring of the herd's health. We also encourage the Federal Subsistence Management Program to listen to the local observations and expert knowledge of subsistence hunters who know this caribou herd well, have been concerned about its conservation at the outset, and alerted the Board to its decline before the latest population surveys were conducted.

#### **6. Climate change effects on subsistence resources, activities, and safe access and possible mitigation measures**

The Council addressed this issue at great length in our FY-2019 Annual Report (enclosed). We bring it up again to continue to explore possible mitigation measures to support subsistence in a changing environment. There will be some Federal subsistence proposals coming before the Board to help provide flexibility with timing, seasons, areas, and tools that can be used to help subsistence hunters and fishers. These proposal requests may be regarding changing of hunt area boundaries when low water conditions on rivers make them no longer accessible by boat; or extending seasons into fall or alternate winter season if weather conditions are too hot; or asking for to-be-announced seasons when the snow and ice are safe for snow machine travel. Additionally, the Council notes that recent years of hot dry summers and low snow pack and warm river temperatures is causing heat stress to fish. The salmon may be swimming deeper in the cooler waters and there may soon be a time to increase the allowed net mesh depth to support subsistence fishers successfully catching salmon when they are swimming at greater depths.

#### **7. Hardship on the Council and community to participate by teleconference only**

Participation in the Council meetings by teleconference only has been very difficult. The Council recognizes the safety precautions needed to protect rural communities due to COVID-19, but it has come at great hardship and loss of effectiveness for the Council. Teleconference lines are full of static and background noise and calls repeatedly get dropped. It is very difficult to hear and challenging to fully engage in the meeting under these conditions. The Council would like to stress the importance of meetings in person, where the Council can engage with each other, the community, and Office of Subsistence Management staff, agencies, and Tribal representatives. We lose a lot of meaning, context, and connection as a result of being apart during teleconference meetings. There is no way to share visual information or data to all participating by teleconference. The Council strongly encourages the Federal Subsistence Management Program to resume in-person meetings as soon as safely possible. Until such time we request the program explore all options to increase the effectiveness of better teleconferencing services with improved reception, elimination of background noise, and computer support to Council members. The Council requests that computer-based videoconferencing options (such as Zoom) are provided so the Council members can see each other and all the speakers and their presentations.

The Yukon-Kuskokwim Delta 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 Yukon-Kuskokwim Delta Region. If you have any questions regarding this report, please contact me via Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management, at [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov), or 1-800-478-1456 or (907) 786-3358.

Sincerely,



Raymond Oney  
Chair

Enclosure

cc Federal Subsistence Board

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Sue Detwiler, Assistant Regional Director, Office of Subsistence Management

Lisa Maas, Wildlife Division Supervisor, Office of Subsistence Management

Tom Kron, Statewide Support Division Supervisor, Office of Subsistence Management

George Pappas, State Subsistence Liaison and acting Fisheries Division Lead, Office of Subsistence Management

Pippa Kenner, acting Policy Coordinator, Office of Subsistence Management

Jonathan Vickers, Anthropology Division Supervisor, Office of Subsistence Management

Katerina Wessels, Supervisory Program Analyst, Council Coordination Division,  
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Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record