

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

c/o Office of Subsistence Management  
1011 E. Tudor Road M/S 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 787-3888, Fax: (907) 786-3898  
Toll Free: 1-800-478-1456

RAC YKD 19053.EP

**MAY 19 2020**

Anthony Christianson, Chair  
Federal Subsistence Board  
c/o Office of Subsistence Management  
1011 E. Tudor Road, MS121  
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) submits this FY-2019 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 meeting in Bethel on November 6-8, 2019, the Council identified concerns and recommendations for this report, approving it at its winter 2020 public meeting conducted via teleconference. 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 Yukon-Kuskokwim Delta Region.

At its fall 2019 meeting, the Council reviewed the Board's 2018 Annual Report Reply and discussed subsistence issues of importance to the region to consider for this year's annual report. The Council heard public comments regarding subsistence salmon, moose, and caribou management and the importance of timing for subsistence opportunity and successful preservation. The Council had an extensive discussion regarding observed climate change impacts to subsistence resources and activities. This overwhelming concern is central to this report to the Board.

From its various discussions, the Council identified the following issues to bring to your attention in this annual report:

### **1. Climate change impacts to subsistence fish and wildlife and habitat**

Council members have shared at length their observations of changes to subsistence fish, wildlife, and habitat in the areas around their communities and are extremely concerned for the continuation of their subsistence way of life. The Council stressed that increasing winter storms and weather events such as the extreme ice storm that delayed this very meeting is causing great

impact to all the animals. Ptarmigan are declining because there is no snow for protective cover. Hard freezing rain soaks their feathers and causes them to freeze to death. Moose have difficulty foraging and escaping predators on the slick ice and caribou are unable to scrape through inches thick ice covering the ground to access their food. Extreme hot summer temperatures and low, warm water has caused many fish to die. Council members recounted many observations this past summer of dead salmon floating downriver prior to spawning, and dead whitefish and even dead salmon smolt due to very low and warm waters on both the Yukon and Kuskokwim Rivers. The rivers are no longer breaking up as Council members remember. Now, the thinner ice melts in place and does not create the scouring floes like in the past. The timing of seasons are changing, causing animal and bird migrations to shift.

Council members relayed the changes they have seen in their lifetimes and the last ten years are nothing like they or their Elders have ever experienced. The Council wishes to convey to the Board that these changes are very real and to raise awareness for the gravity of the impact these changes have on subsistence resources.

## **2. Climate change impacts to subsistence activities, travel, and access to resources**

Changes occurring in the weather in recent years are causing more and more challenges for people to access subsistence resources and safely preserve harvested foods. The lack of winter snow has greatly hampered winter travel by snowmachine to conduct traditional subsistence hunting and fishing activities. Thin ice on lakes and rivers has resulted in extremely dangerous winter travel, jeopardizing the safety of those venturing out in the Yukon-Kuskokwim Delta region. Winter subsistence fishing and trapping activities require ice thick enough to safely jig for fish, to set traps and under ice nets. Warmer winter temperatures make it difficult to freeze subsistence foods outside and store them safely over the winter as has been done traditionally. Increasingly hot summertime temperatures have created a challenge for safely preserving harvested meat and fish. Overall, these environmental changes are impeding subsistence access to many resources and impacting the ability to safely harvest and store subsistence foods.

## **3. Request for continued research and information to address and mitigate climate change impacts in the Y-K Delta region**

The Council requests Federal land managers and other agencies to engage in research to better understand the impacts of climate change on important subsistence resources and work on possible mitigation measures that will help support subsistence communities. The Council requests the Federal subsistence program continue to share this information with the Council and engage in dialog with the Council and communities on strategies to best address changing subsistence resources and ensure continued subsistence opportunity into the future.

## **4. Adaptive management strategies to respond to changing subsistence resources, access, and preservation of subsistence foods**

The Council requests the Federal Subsistence Board consider the issues raised in this report regarding climate change when making recommendations on Federal subsistence fish and wildlife regulations. Changing environmental conditions, shifting seasons and migratory

patterns, and safe access to subsistence resources will likely continue to create the need for more flexible regulations and management strategies into the future. Strategies discussed by the Council include shifting the fall moose hunt to later in the season when temperatures are cooler and moose are more active, which would result in more successful hunts, as well as better meat preservation. A to-be-announced hunting season for moose in winter so that subsistence opportunity occurs when the snow and ice conditions are conducive for safe travel is another option. Salmon fishing opportunities when the weather is good for drying fish with reduced risk of spoilage should also be examined.

**5. Ongoing concerns about seabird die-offs, sick seals, and request for continued informational updates about marine environments integral to subsistence**

The Council raised the concern about sick and dying marine life in the previous Annual Report to the Board and appreciated receiving informational reports by lead agencies on this topic and a venue to share local observations. While the Council recognizes that the marine environment is outside the jurisdiction of the Federal Subsistence Board, marine resources are essential for the life and livelihood of all communities in the Yukon-Kuskokwim Delta region. What is occurring in the marine environment is integrally connected to the subsistence way of life in the region, as well as the life and well-being of critical subsistence resources such as salmon, seals and migratory birds. The Council very much appreciates the opportunity to receive the latest reports on these subjects and hopes to continue this dialog and information sharing at future meetings.

**6. Concerns about observed songbird declines in the Y-K Delta region**

The Council is very concerned about songbird declines observed in the region. Several Council members reported that in recent years they have seen fewer and fewer songbirds while out on the land and it is unusually quiet on the tundra. Council members noted that they have enjoyed the song of little birds around their fish camp throughout their entire lives, but now when they bring their grandkids into the wilderness in the spring, it is quiet. While songbirds are not used for subsistence, they are a part of what they love about subsistence life. Additionally, birds such as Arctic terns, which are usually seen in abundance around communities throughout the Yukon-Kuskokwim Delta Region are encountered less and less. Council members are concerned what this tundra wetlands and songbird decline means for the rest of the environment and wonder if it is related to the seabird die-off.

**7. Concerns about Donlin Mine potential impacts to subsistence**

The Council is concerned about the environmental impacts to subsistence resources and changing access to these resources from the development of the proposed Donlin Mine. The Council is also concerned about the risk of spills or contamination to the Kuskokwim River and surrounding environment. While the Council understands the interest in this economic development in the region, the subsistence resources such as salmon are an irreplaceable part of life and livelihood for all communities on the Yukon-Kuskokwim Delta.

The Council has expressed concerns at previous meetings about the likely impacts to subsistence as reported in the Donlin Gold Project Final EIS ANILCA Section 810 analysis (enclosure),

which indicates the mine “may significantly restrict” subsistence for every community in the vicinity and downriver of the mine as proposed – from Crooked Creek to the mouth of the Kuskokwim River. The Council also has very serious concerns about the proposed number of daily barges on the Kuskokwim River required to support the Donlin mine development and operations. Opportunity for subsistence fishing on the Kuskokwim is already limited for Chinook Salmon conservation measures. Barge traffic will increase up to 200 percent, with at least several barges heading upriver and downriver every day during open water on the river from break up to freeze up (June 1 to October 1). This vessel traffic would only add to fisheries management challenges and interfere directly with subsistence fishing opportunity. Subsistence fishers will have to pull drift nets and move out of the way of a barge or dislodge set nets. The large and long lasting wake of large barges will cause bank erosion, thus impacting fish camps and nearshore fish habitat.

Additionally, the Council is gravely concerned about direct impacts on subsistence fisheries and resources from barge accidents spilling diesel fuel or other cargo, such as the cyanide that will be shipped to process gold at the mine site. Sensitive fish habitat and salmon smolt migrating downstream in early spring may also be negatively impacted by prop wash of large barges. Some critical spawning areas may be destroyed by the near constant large barge traffic, such as the shallow water gravel bed below Kalskag that is known as the primary Rainbow Smelt spawning habitat. Communities will be at a direct risk of losing this highly valued subsistence resource. Rainbow Smelt are some of the most abundant fresh subsistence fish harvested in the spring by communities all along the Kuskokwim River as they migrate upriver to spawn. All of this would occur within the Federal waters of the Yukon-Delta National Wildlife Refuge.

#### **8. Address sunken and derelict barges polluting the Kuskokwim River.**

The Council has ongoing concerns about the numerous sunken and derelict barges on the Kuskokwim River. These sunken barges are a safety hazard for people traveling by boat to conduct their regular subsistence activities and overall are contaminating the water with leaking fuel, oil, and other chemicals used onboard and in the barge engines. Some barges such as those located in Steamboat Slough just upriver from Bethel have long since been abandoned by the company that operated them and to date no agency has taken responsibility to clean up or remove them. A barge sank near the Kwethluk River a few years ago continues to leak contaminants and has never been cleaned up. The clean-up and removal of the barge has not been addressed, even though the barge owner still operates on the river. The Council is very concerned about the impacts of these barges and the pollutants that continue to flow into the waters of the Kuskokwim affecting subsistence fish and contaminating the water that communities drink. The Council requests that the agencies responsible address the issue. Furthermore, the Council would like to highlight because the contaminants from sunken barges have not been dealt with all these years, there is a high probability that problems caused by the greatly increased barge traffic associated with Donlin Mine would ever be addressed, even if there was an accident.

#### **9. Council member travel and ample time for full participation and sharing of traditional knowledge at RAC meetings**

The Council requests more time to allow for safe travel to RAC meetings. While all travel is always dependent on weather in the Yukon-Kuskokwim Delta, recent increases in winter storms and freezing rain have created more flight delays and cancellations, which are a real challenge for achieving quorum at meetings. Council travel is often booked immediately prior to the start of the meeting, and meeting days extend late into the night to complete all the business of a very full agenda covering subsistence management in a vast Yukon-Kuskokwim Region, which is not reasonable. The Council requests that the Board consider more realistic travel-time requirements to get to the Council members to a meeting safely with ample time to be rested and able to participate in full meetings. All Council members should have an opportunity to participate in person at the meetings to share traditional knowledge from throughout the entire region. Often coastal community representatives are at a disadvantage for flying due to the unpredictability of marine weather. A little more time for travel to account for likely delays would help increase the chance for Council members to make it to the meeting in time to participate in person.

#### **10. Importance of appointing more Yukon River and coastal representatives for balanced membership on the Council**

The Council remains very concerned about the number of vacancies created because of an insufficient number of Council appointments in the last two years. The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council serves a large and diverse region with over 40 communities, including several of the largest rivers and coastal deltas in both size and importance for subsistence fishing. The Council cannot adequately represent the many communities of the region and address resource management on the diverse subsistence hunting and fishing issues from the Yukon to the Kuskokwim, Kenektok, and Goodnews rivers and deltas and everything in between without a full membership of the 13-seat Council with a balanced representation from each part of the region. The complexity of fisheries management on the Yukon and Kuskokwim rivers in particular requires having at least several representatives who are residents from several villages along each river and coastal areas to adequately inform the Council's recommendations. The recent lack of sufficient Yukon River and coastal representatives has hampered the Council's ability to fully inform management on subsistence issues specific to communities in these regions of the Yukon-Kuskokwim Delta. The Council requests the Board's support for outreach in the region to recruit a balance of applications from the 41 villages and to ensure that the Secretary of the Interior appoints highly qualified applicants from across the region.

#### **11. Recognition in honor of the late Harry Wilde, Sr.**

The Council requests the Board formally recognize Harry Wilde, Sr. for his lifetime of service and dedication to subsistence in the Yukon-Kuskokwim Delta region. Harry Wilde, Sr. was a long-time member and Chair of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council, serving from 1993 to 2014. Sadly, he passed away shortly before the winter 2020 Council meeting. The Council would like to honor his legacy as a tireless subsistence advocate and revered elder.

The Council thanks you for 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 of 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,



Alissa Nadine Rogers  
Chair

Enclosure

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Susan Detwiler, Assistant Regional Director, Office of Subsistence Management  
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management  
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management  
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management  
Tom Kron, Acting Council Coordination Division Supervisor,  
Office of Subsistence Management  
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