

Western Interior Subsistence Regional Advisory Council

c/o Office of Subsistence Management

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503-6199

Phone: (907) 787-3888, Fax: (907) 786-3898

Toll Free: 1-800-478-1456

IN REPLY REFER TO:

RAC/WI.23014.NP

APR 27 2023

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 Western Interior Alaska Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2022 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 in Fairbanks on October 19-20, 2022, the Council identified concerns and recommendations for this report, and approved this annual report at its winter 2023 meeting held in Aniak on April 4-5, 2023. The Council wishes to share information and raise concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Western Interior Region.

1. Sheep Management Plan for Units 24A and 26B

The Council has concerns over the 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. There currently is not a set framework in place in for when the lands reopen to sheep hunting.

Recommendation:

The Council has developed a draft sheep management plan for Units 24A and 26B, west of the Sagavanirktok River, to achieve Dall sheep population recovery to carrying capacity. The plan will give direction to management of non-Federally qualified use, and to assure federal users priority allocation. The Council is currently in the process of seeking feedback from affected State and Federal agencies. Those comments will be considered when the Councils reviews the

draft plan at our Fall 2023 meeting, and the finalized draft plan will be forwarded to the Board for consideration and approval.

2. Failing Sheep Population in Unit 19C

The Unit 19C has sheep population has declined as a result of winter weather events. Sheep hunting guides that have operated in Unit 19C have already begun to relocate to other units due to low population levels, including low numbers of legal rams, and the State Board of Game has eliminated non-resident and youth hunting seasons in the unit. The Council hoped that the State would have closed the sheep hunting season in this unit, or would have begun the process to modify the legal definition of a full curl ram..

Recommendation:

None at this time, the Council would like the Board to be aware of these concerns.

3. Continued Decline of Mulchatna Caribou Herd

The Council would like to make the Board aware of the difficulty stabilizing the Mulchatna Caribou Herd population despite ongoing efforts by Federal and State managers. The Mulchatna Caribou Herd is an important subsistence resource for residents of the Kuskokwim River drainage, who are already facing food insecurities due to multiple years of severe subsistence salmon fishing restrictions or closures.

Recommendation:

None at this time, the Council would like the Board to be aware of these concerns.

4. Concern how Pittman-Robertson Wildlife Restoration Act funds are allocated

The allocation formula for Pittman-Robertson Wildlife Restoration Act (P-R Act) funds relies on hunting tags and license sales. This can result in states prioritizing the sale of resident and non-resident hunting licenses and tags over species conservation. The cost of non-resident tags and licenses cost significantly more than the equivalent resident Alaska prices, these tags and licenses bring the most P-R Act revenue and are therefore more desirable to the State than resident license and tag sales.

As this formula for the P-R Act is nationwide, this is a nationwide concern, and not unique to Alaska. This Council believes that states would be more conservation minded if they were not trying to maximize non-resident participation to receive as much Federal match funds as possible through the current allocation formula.

Recommendation:

The allocation formula should be restructured. The match portion tied to license sales should be eliminated, and the states should receive a set allocation. States would receive the full benefit of the excise taxes without having to rely on hunter participation. This would allow states to put conservation of species back in the forefront of sustainable management. Competing for funding with inordinate license and tag sales, to still not receive full allocation is counter to the purpose of the P-R Act and wise conservation. Full allocation released to the states will allow them to know in advance the available funding amounts to plan accordingly.

The Council wishes this concern be elevated to the Secretaries of the Interior and Agriculture.

5. Commercial Interception of Kuskokwim and Yukon River Bound Salmon

In 2022, returns of Chinook and Chum salmon in the Kuskokwim and Yukon Rivers and Coho Salmon in the Kuskokwim River were catastrophically low. This resulted in no salmon harvest opportunities on the Yukon River and early-season restrictions and a late summer subsistence fishing closure in the Kuskokwim River. Commercial salmon fishing continues to occur in the marine environment both in the State managed South Alaska Peninsula salmon fishery, or Area M, where salmon bound for Yukon and Kuskokwim rivers are intercepted and sold for profit. Salmon from these rivers are also caught in the Federally managed Bering Sea Aleutian Islands Trawl Fleet pollock fishery, where they are discarded in the high seas as bycatch at a 100% mortality rate. The recent regulatory changes enacted by the Board of Fisheries and the North Pacific Fisheries Management Council will not do enough in either of these fisheries to curtail the interception of Kuskokwim and Yukon bound salmon stocks, while escapement goals for both rivers continue to be unmet and subsistence opportunities are severely restricted or nonexistent.

Recommendation:

None at this time, the Council would like the Board to be aware of these concerns.

6. Severe Subsistence Restrictions for the Kuskokwim River During the 2023 Coho Salmon Run

All subsistence fishing was effectively closed in the Kuskokwim River from mid-August to mid-September 2022 to protect the remainder of the Coho Salmon run, which returned in much lower numbers than Federal and State managers expected. While the closure did allow for minimal gear to be used in in slack water areas and far off the mainstem, these opportunities did not provide adequate subsistence opportunities for subsistence users to harvest nonsalmon species, namely whitefish. This closure was in addition to earlier subsistence salmon fishing restrictions due to Chinook and Chum salmon conservation and increased the food insecurity of subsistence users on the Kuskokwim River.

Recommendation:

None at this time, the Council would like the Board to be aware of these concerns.

7. Highlighting the Success and Requesting Expansion of Tribal Consultation

The salmon co-management on the Kuskokwim River between the U.S. Fish and Wildlife Service (USFWS) and the Kuskokwim Inter-Tribal Fish Commission continues to be a success despite continued poor salmon runs into this system. The Council hopes that the Tribes on the Yukon River can establish similar successful programs among themselves and the USFWS.

Recommendation:

The Council would like to see Tribal consultation and co-management be expanded to include species that are of conservation concern, as well as for those that are of cultural and subsistence importance to local Tribes. This could be accomplished by the Board encouraging the Federal landowners to do so. The Council would also like to see Tribal consultation and co-management occur with other branches of the Federal Government outside the DOI, specifically the Department of Commerce as this department oversees the National Oceans and Atmospheric Administration (NOAA). The NOAA Alaska Regional Office works with the North Pacific Fishery Management Council to manage Federal marine commercial fishing in Alaskan waters, including the Bering Sea and Aleutian Island Pollock trawl fishery. This fishery currently incidentally catches Yukon and Kuskokwim drainage bound salmon and discards them as bycatch. This practice is exacerbating the significant population decline of pacific salmon in these drainages. The Council is currently unsure of what steps could be taken by the Board to facilitate this.

8. Continued Reliance on Nonsalmon Species for Subsistence Needs

Due to the continued poor run strength of multiple species of salmon into the Yukon and Kuskokwim rivers, subsistence users are relying heavily on nonsalmon species such as whitefish, Northern Pike, and Long Nosed Suckers to feed themselves and the remaining traditional dog teams. 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 these species, while waiting for salmon runs to improve, especially considering the length of time that some of these salmon runs have been depressed.

Recommendation:

None at this time, the Council would like the Board to be aware of these concerns. The Council will continue to utilize the priority information needs through the Fisheries Resource Monitoring Program for the Yukon and Kuskokwim to emphasize these concerns.

9. Continue to Encourage Federal Agencies to Assist in Salmon Recovery

The Council would like the Board to continue to encourage federal agencies to do everything necessary to develop a comprehensive understanding of the driving forces behind the continued

multi-species salmon population crash in the Yukon and Kuskokwim River drainages to better facilitate stock recovery.

Recommendation:

The Council recommends the Federal Subsistence Management Program adequately fund and staff federal agency projects and fill staff positions that are involved in the Kuskokwim and Yukon drainages.

10. Development of the Ambler Road Project

Despite substantial negative impacts on Arctic ecosystems and subsistence users in the Northwest Arctic, North Slope and Western Interior regions, the Alaska Industrial Development Authority continues to push for the development of the Ambler Road Project.

Recommendation:

None at this time, the Council would like the Board to be aware of these concerns.

11. Representation on the Council

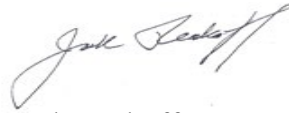
The vast Western Interior Region stretches all the way from the mid Kuskokwim River to the Arctic Circle, but not all parts of the region currently have representation on the Council. Therefore, the Council could be making recommendations to the Board on areas of their region that are not represented, and Council members may be needed to participate in working groups and planning teams in arenas that may be outside of their individual expertise. For example, there is currently no representation on the Council from the Grayling, Anvik, Shageluk, and Holy Cross (GASH) subregion, and, as a result, the Council's current representative member on the Alaska Wood Bison Management Planning Team is not from the GASH subregion, where the wood bison were released. Currently, the Council only has one member who resides on the Kuskokwim River, while this drainage covers a large percentage of the Western Interior Region.

Recommendation:

The Council would like effort to be made to increase the outreach and solicitation of applications from these unrepresented areas and communities.

The Western Interior Alaska 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 Western Interior Region. If you have any questions regarding this report, please contact me via Nissa Pilcher, Subsistence Council Coordinator, Office of Subsistence Management, at nissa_batespilcher@fws.gov, or 1-800-478-1456 or (907)455-1847.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jack Reakoff", written in a cursive style.

Jack Reakoff
Chair

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Western Interior Alaska Subsistence Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record