

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Telephone: (907) 786-3674, Fax: 907-786-3989
Toll-Free: 1-800-478-1456

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Anthony Christianson, Chair
Federal Subsistence Board
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Eastern Interior Alaska Subsistence Regional Advisory Council (Council) submits this 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 meeting via teleconference on October 14-15, 2020, the Council identified concerns and recommendations for this report. The Council approved this annual report at its winter 2021 meeting. The Council wishes to share information and raise a number of concerns aligned with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Eastern Interior Alaska Region.

1. Food security and subsistence needs satisfaction

The Council brings its concern to the attention of the Board regarding rapidly declining important subsistence food resources in the Eastern Interior Region, which results in most of the subsistence needs not being met (except caribou). The Council members report that in FY 2020, all across the Region, the fisheries were very poor and salmon are in significant decline. Salmon are one of the most critical subsistence resources that communities rely on for food security. According to ADF&G data, “The composition of the wild food harvest in rural Alaska is 31.8% salmon, 21.4% other fish, 22.3% land mammals, 14.2% marine mammals, 2.9% birds, 3.2% shellfish, and 4.2% wild plants.”¹

In the summer of 2020, some communities had almost no fishing opportunities and the average season’s catch was dismal (sometimes as few as three fish) with only a few Chinook Salmon and fall Chum Salmon. Sometimes, the only fish available to Federally qualified subsistence users were whitefish, pike, suckers, and sticklebacks. The returning

¹ Food Security and Wild Resource Harvests in Alaska, James A. Fall and Marylynne L. Kostick, Alaska Department of Fish and Game Division of Subsistence, July 2018.

Chinook Salmon were of the poorest quality Yukon fishers had seen in the last 30 years. With few salmon coming, there is a lot of hardship and lack of critical food for the Federally qualified subsistence users in the communities along the Yukon River and in other parts of the Eastern Interior Region.

Besides being a critical food source for Federally qualified subsistence users, Chum Salmon are also a very important food source for sled dogs. The poor returns, especially of fall Chum Salmon, resulted in tremendous costs to mushers that maintain sled dog teams. The lack of fish last summer left mushers unable to stock up enough food for their dog teams for the winter, and many mushers had to cull their teams, sometimes as much as fifty percent. Due to the pandemic travel restrictions and quarantines, Federally qualified subsistence users were not even able to travel to other fishing areas in the State to compensate for the lack of fish in their region.

According to the U.S. Congress findings outlined in the Title VIII Sec. 801 of ANILCA, “the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and non-Natives, on the public lands ... is essential to Native physical, economic, traditional, and cultural existence and to non-Native physical, economic, traditional, and social existence.” ANILCA also states that “no practical alternative means are available to replace the food supplies and other items gathered from fish and wildlife ...” Based on its observations, the Council feels that over the coming decade climate change impacts and other environmental stressors will have significant yet unpredictable impacts on food security for the Federally qualified subsistence users.

The Council raises the alarm that the depletion of wild salmon stocks creates a very serious situation making traditional food unavailable to the users. The Council requests that the Board directs Federal managers to step up and develop measures to mitigate the situation before it is too late. The Federal managers need to make their decisions based on Federally qualified subsistence users’ food needs that are identified through comprehensive surveys. Additionally, the Council believes that Federal managers need to show flexibility, and when salmon stocks are not available, provide easier access to the other subsistence fish stocks. Based on last summer’s situation, it is very important to develop adaptation strategies and policy responses in cooperation with State managers to accommodate subsistence users’ critical needs and provide food security.

2. Impacts of hatchery production on Alaska’s wild fisheries

In the last three annual reports, the Council highlighted to the Board the issue of hatchery production impacts on Alaska’s wild fisheries.

The Council understands that, as the Board pointed out in its FY 2019 annual report reply, “the hatchery system in Alaska and the vast majority of Alaska’s marine waters are outside the purview of the Board”; however, the Council acts in accordance with the ANILCA Title VIII mandate that these annual reports to the Board contain “an evaluation of current and anticipated subsistence needs for fish” and “recommended strategy for the management of fish.” The Council believes that the increase in hatchery production is

having tremendous biological impact on all of Alaska's wild fisheries.

It is time for Yukon River subsistence users to be better informed about the potential impacts of hatchery production on their fisheries in the State of Alaska and along the Pacific Rim. ANILCA mandates that the Council can have access to "all available technical and scientific support data"; therefore, the Council requests to make the existing data on the current biological impacts of hatchery production available to it. Specifically, the Council requests a synopsis of historic data on hatchery production from 1980 to the present. Having access to this information will allow the Council that represents the Federally qualified subsistence users of the Eastern Interior Region to have a better understanding of anthropogenic impacts on fish resources crucial to the users. Understanding these impacts is key to restoring some of these fisheries.

The fish populations are not familiar with, and don't recognize administrative borders of, various Federal and State agencies. For this reason, the Council suggests that the Board consider working collaboratively across traditional jurisdictional boundaries with other agencies to develop policies and regulations that support "the continued viability of such populations" and insure long term viable fisheries for Federally qualified subsistence users throughout the State of Alaska.

3. Climate change and its impacts on moose mating seasons

The Council observed that over the last few years, moose were not going into rut until the end of September, which has a significant impact on the current hunting season. The Council also wants to highlight to the Board its observation of smaller calf moose in the early spring, which is potentially a result of climate change.

In accordance with ANILCA mandates, the Council requests "all available technical and scientific support data" on climate change impacts on moose, for example later rutting dates and potential effects on legal hunting seasons. Having access to this information will allow the Council to develop informed proposed regulatory changes and work with State and Federal managers on adjusting hunting seasons that better correspond to the moose rutting season. Timely adjustment of hunting seasons on the Federal public lands will accommodate remote Federally qualified subsistence users, so they can harvest moose legally when the weather is sufficiently cool for hanging meat to dry. Many remote users do not have freezers, and rely on harvesting when weather conditions are cooler and drier.

4. Hunter ethics education and outreach and dialog with rural communities

The Council again would like to emphasize to the Board their wishes to continue work on developing of the Board's approved hunter ethics and education initiative. To achieve better understanding between rural communities and the Federal Subsistence Management Program, it is imperative to increase cultural awareness and foster respect for people who live in rural Alaska. The Council also would like to have a better mechanism to engage in a direct dialog with rural communities like Arctic Village. A lot

of the times when a meeting is held in a hub community, rural users do not have an opportunity to attend it.

In October 2019, the Council requested the Board's approval to create a subcommittee to work on Arctic Village Sheep Management Area issues and find mutually beneficial solutions. The Board deferred to act on the Council's request until the Council, with the help of their Coordinator, develops a framework for establishing this subcommittee. Prior to the fall 2020 Council meeting, no work had been done on the development of this framework due to the Council Coordinator being on extended sick leave and OSM staff shortages, and the last meeting was held via teleconference due to the pandemic travel restrictions.

However, despite these delays, the Council wants to continue pursuing the creation of a subcommittee and other means of having an open, engaged dialog with rural communities. Other means might be to have one of the Board agencies, such as the U.S. Fish and Wildlife Service, sponsor a Council member trip to a community, or receive approval from OSM's Assistant Regional Director to hold a future meeting in a rural community. Getting users from rural communities like Arctic Village involved with the Council will provide them with better opportunities to become proactive in the management of the wildlife; plus, it can become an example for other communities. The Council requests that OSM provide "adequate qualified staff," as mandated in ANILCA, to accomplish these goals.

5. Copper River Sockeye and Chinook Salmon

The 2021 pre-season estimates indicate that Sockeye and Chinook salmon will be below the most recent 10-year average by 37.4% and 22.4%, respectively. For Chinook Salmon, this recent 10-year average already represents a steep decline from previous decades. The 10-year average for the 1998 - 2007 period was 86,684, compared with only 47,386 for the 2010 - 2019 period². While Sockeye Salmon runs were generally strong during the early 2010s³, they have been markedly smaller since 2017, and alarmingly low during 2018 and 2020. The estimated total run size for 2018 is 817,121, while preliminary estimates for 2020 put the number at 602,000, making these among the lowest returns since at least the early 1980s. These declines indicate an urgent need for more research into better understanding Copper River salmon fisheries, in order to inform management of these crucial subsistence resources. The Council requests that the Office of Subsistence Management prioritizes funding research of Copper River salmon fisheries through its Fisheries Resource Monitoring Program.


The Eastern Interior Alaska Subsistence Regional Advisory Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence

² Run Timing and Spawning Distribution of Copper River Chinook Salmon, Corey Schwanke, ADF&G, Division of Sport Fish and Commercial Fisheries, July 2019, p. 3.

³ Management of Salmon Stocks in the Copper River, Report to the Alaska Board of Fisheries: December 1-5, 2017, Valdez, Alaska, Jeremy Botz and Mark A. Somerville, ADF&G, Division of Sport Fish and Commercial Fisheries, November 2017, p. 29.

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 from the Eastern Interior Region. If you have questions about this report, please contact me via Katerina Wessels, Subsistence Council Coordinator with the Office of Subsistence Management at 1-800-478-1456 or 907-786-3885, or email at katerina_wessels@fws.gov.

Sincerely,



Susan Entsminger
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
Hannah Voorhees, Acting Policy Coordinator, Office of Subsistence Management
Lisa Maas Grediagin, Wildlife Division Supervisor
Office of Subsistence Management
George Pappas, State Liaison and Acting Fisheries Division Supervisor,
Office of Subsistence Management
Tom Kron, Statewide Support Division Supervisor,
Office of Subsistence Management
Katerina Wessels, Council Coordination Division Supervisor
Office of Subsistence Management
Corey Graham, Fisheries Biologist, 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