

Eastern Interior Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To:

22144

APR 25 2023

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

Dear Chairman Christianson,

The Eastern 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 meeting on October 5-6, 2022, the Council identified concerns and recommendations for this report. The Council approved this Annual Report at its March 1-2, 2023 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. Sheep population declines and need for coordinated survey effort

The Council would like to make the Board aware of observed sheep population declines throughout the Eastern Interior Region. The Council is particularly concerned with the low counts of sheep in the Glacier Mountain Controlled Use Area, where numbers have reportedly dropped to only 12 sheep. The Council feels that there needs to be more collaboration between State and Federal partners and more funding available for sheep surveys not only in our region but throughout the State. We request that the Board ask the Federal agencies comprising the Board to make coordinated sheep surveys a priority for 2023.

2. Management of Fortymile Caribou Herd

Recent Fortymile Caribou Herd management actions implemented by the Alaska Department of Fish and Game (ADF&G) utilized liberalized bag limits to drastically reduce the herd due to concerns about nutritional stress. The Council is concerned about this action and feels that politics have too much influence on the management of this herd. Major management decisions

such as this should come before the international Fortymile Caribou Herd Harvest Management Coalition to discuss and agree on. Additionally, the Council feels that managers need to take observations and recommendations from rural residents in the herd's range more seriously.

Lastly, the Council would like to see a greater presence of law enforcement, agency officials, and local community hunter liaisons in road-accessible zones of the Fortymile Caribou Herd during hunting season. The Council continues to have major concerns about safety, hunter ethics, and meat care, especially along the Steese and Taylor highways. We ask the Board to collaborate with the State to take meaningful action to address these issues.

3. On-going salmon fishing closures and record low returns of Yukon River Chinook Salmon

For the third year in a row, there were dismal returns of all Yukon River salmon species. Summer 2022 had the lowest returns on record of Chinook Salmon. Subsistence salmon fishing was closed. Local fishers went without much needed salmon for their families and communities. Even with in-river fishing closed, escapement goals were once again not met. The Council is fearful for the future of our Yukon River salmon resources. We are outraged that Yukon River salmon continue to be bycaught in the Bering Sea and intercepted in the Alaska Peninsula commercial fisheries, while our people along the river are going without. The subsistence priority is not being upheld. People are literally crying for salmon.

The Council believes it is imperative that all State and Federal agencies work together across jurisdictional boundaries to conserve Yukon River salmon stocks using an ecosystem-based management approach. We are asking the Board to take action on this, and if needed, to seek guidance from the Secretaries of the Interior and Agriculture on how to do so.

4. Need for updated moose counts along Yukon River corridor

The Council has requested population estimates from the State of Alaska for moose in Unit 20F for the past two years but has not yet received a report concerning this topic. Residents of Rampart and Tanana have been unable to harvest sufficient moose to meet subsistence needs in recent years. Coupled with salmon fishing closures, the lack of available moose is compounding food security issues in the region. The Council strongly feels that moose surveys need to be completed in this area, and that these data should be used to inform hunt management instead of relying on harvest reports to estimate population. We ask that the Board pass these concerns on to the ADF&G and request information on population and harvest trends for moose in Unit 20F.

5. Food insecurity

Residents of the Yukon River drainage are experiencing unprecedented food insecurity. This is primarily due to three straight years of subsistence salmon fishing restrictions and closures. Salmon closures put more pressure on hunters to harvest moose and caribou, but there are also concerns about low moose and caribou populations in our region, as stated above. These resources are not abundant enough to serve as a replacement to the missing salmon.

In response to the low salmon runs, there have been efforts to distribute salmon from other parts of the State to Yukon River communities. While these goodwill efforts are appreciated, it is not a long-term solution to the food insecurity problems we face. Additionally, receiving salmon “handouts” does not fulfill our cultural needs. One of the most important aspects of subsistence is the harvesting, processing, and sharing of resources with family and friends, as well as passing cultural traditions and ways to our younger generation. If this trend continues, then much of our cultural heritage and subsistence skills will be irrevocably lost.

6. Need for hunter ethics education

The Council asks for the Board’s support to resume the pilot projects associated with the Hunter Ethics Education and Outreach initiative our Council spearheaded prior to the Covid-19 pandemic. As subsistence resources become scarcer, the danger of escalation of the user group conflicts is coming more to the forefront all across the state. It is especially true for the road accessible regions. We strongly believe that our Council’s initiative can help foster understanding between user groups and reduce conflicts, as well as promote more respect of the resource in the field among all user groups. Eventually, we hope that pilot projects in our region can be expanded to other regions as well because our experience shows that there is an elevated interest to this topic among many regions and all user groups.

Additionally, we ask that the Federal Subsistence Management Program collaborate with the State of Alaska to explore ways to incorporate more robust hunter ethics training into all hunter education courses. Although we feel hunter ethics training should be required for all hunters, we recognize that this may not be possible. Something we do feel is achievable is the creation of easily accessible outreach materials regarding hunter ethics and meat care, as well as a comprehensive list of where excess or unwanted meat can be donated by sport hunters.

7. Incorporating local and traditional knowledge into management and need for co-management

The Council would like to see local and traditional knowledge incorporated into fish and wildlife management in more meaningful ways. While we feel there has been a slight increase in efforts to do so in the recent past, we feel that more efforts are needed. Additionally, we encourage the Federal Subsistence Management Program to explore opportunities for co-management agreements with Federally recognized Tribes in our region. There are successful examples from other places that can be used as models.

8. Climate change impacts, especially to timing of fall moose rut

The Council would like the Board to be aware that residents of the Eastern Interior Alaska Region continue to see impacts of climate change to the landscapes and weather patterns in our region. One impact of note is that fall weather has tended to be warmer later into the season and has resulted in delayed timing of the fall moose rut. This change in moose behavior negatively impacts subsistence hunter success rates. The Board may need to consider shifting or extending fall moose hunts in the near future to address this issue.

The Council also encourages all the agencies represented by the Board to rigorously monitor impacts of climate change in our region and across the state, and to be certain to include local resident observations and knowledge into research and monitoring.

9. Support needed for subsistence education and culture camps for children and youth

The Council feels that the Federal Subsistence Management Program and ADF&G should start supporting more subsistence education and culture camps in communities and especially along the Yukon River. Without subsistence salmon fishing opportunities, people are no longer going to fish camp and passing down knowledge and skills to younger generations like was the norm in the past. We feel that more organized educational opportunities are needed to help fill this void. We suggest that the Federal Subsistence Management Program partner with school districts to develop curricula that will teach traditional skills, educate youth about the state of wild resources and climate change impacts, and also about resource management regimes. This will take extra funding and coordination, but if action is not taken there will be gaps in knowledge of how to live off the land. The Council would like to see funding opportunities made available for educational programs and cultural camps that are not necessarily tied to research dollars.

10. Cost to use Bureau of Land Management (BLM) public use cabins for subsistence activities

The Council is concerned about the fees required to use BLM cabins for subsistence activities such as trapping. Most rural residents and subsistence users have limited income, and the application fees to utilize BLM cabins are cost prohibitive. There are very few people still living out on the land and fewer trying to teach their children traditional skills. Subsistence trappers use cabins as occasional shelter when traveling out on the land or as needed for emergency shelter. Subsistence users help maintain the cabins, which is a great benefit to BLM.

The Council strongly feels that there should be a distinction made between the permits and fees required for subsistence users versus for commercial users. Rural residents residing in the region should have no application fee or a very low application fee to use BLM cabins. They should also not be burdened with providing documentation of their income. Subsistence users should be encouraged, not discouraged, to use public use cabins. The Council asks the Board to urge the BLM to change their policies for public use cabin permits for subsistence users to make it easier for rural residents to continue their traditional practices out on the land.

11. OSM's inaccurate characterization of the impacts of Alaska Board of Fisheries proposals to subsistence

The Council is extremely disappointed with the comment letter submitted by OSM to the Alaska Board of Fisheries (BOF) regarding fisheries proposals for the 2023 Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting. In their comment letter OSM stated, "[OSM] has reviewed the proposals and believes that adoption of any of these proposals will not have significant impacts on Federal subsistence users or fisheries" (see Enclosure 1).

The statement made by OSM is utterly false. Commercial fisheries in the Area M region are mixed-stock fisheries and of the stocks harvested, Arctic-Yukon-Kuskokwim (AYK) salmon compose a significant proportion of the harvest during the month of June. In recent years, AYK subsistence salmon fisheries have been closed or heavily restricted while Area M commercial fisheries continued to operate. As stated above in Topic 3, this is in blatant violation of the subsistence priority spelled out in State and Federal laws. The Area M fisheries indeed have significant impacts to Federal subsistence users and fisheries because the salmon harvested in Area M could instead be fish that return to AYK rivers to spawn or contribute to subsistence needs.

OSM's statement completely disregarded the concerns that this and other Councils have been raising for over a decade about interception of AYK salmon, not to mention our Council comments submitted about Proposal 140 that were reviewed by OSM this year. There were record numbers of testifiers at the BOF Meeting because of regionwide coordination efforts of subsistence users to advocate for our subsistence salmon. OSM's statement undermined the significant efforts of the four AYK Subsistence Regional Advisory Councils and subsistence users to address the Area M intercept fisheries that harvest salmon bound for AYK drainages. Instead of backing us up, OSM opposed us.

After a member of our Council voiced concerns to OSM, OSM withdrew their comment letter and submitted a new comment to clarify the intent of their original statement at the BOF meeting in February (Enclosure 2). However, the new statement still did not address the significant impacts to AYK subsistence fisheries due to salmon intercepted in Area M. OSM explained at our Winter 2023 Council meeting that their policy for a number of years has been to not comment on any proposals outside of Federal Subsistence Management jurisdiction. Our Council requests that the Board direct OSM to revisit this policy because what happens in fisheries outside of Federal jurisdiction can and does have a significant impact on fisheries within Federal subsistence jurisdiction.

In the future, we request OSM to reach out to Councils to discuss comments and recommendations they make that affect subsistence users before they are submitted. Additionally, OSM should review Council comments and correspondence to ensure that OSM's positions align with the Councils' positions. If they do not, OSM should be required to provide meaningful justification for the reasons. This process will provide for better collaboration and ensure that letters that go to the Alaska BOF and Board of Game will have unified stances on important issues that affect Federal subsistence users. Our Council requests that OSM present at our Fall 2023 meeting on an updated policy for commenting on proposals outside of Federal jurisdiction that impact subsistence within Federal jurisdiction and on how OSM will better collaborate with Councils when submitting comments.

The Eastern 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 Eastern Interior Region. If you have any

questions regarding this report, please contact me via Brooke McDavid, Council Coordinator, Office of Subsistence Management, at brooke_mcdavid@fws.gov, or 907-891-9181.

Sincerely,

A handwritten signature in dark ink, appearing to read "Sue Entsminger". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Sue Entsminger
Chair, Regional Advisory Council
Eastern Interior Region

Enclosures

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



United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:
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FEB 2 2023

Ms. Märít Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Alaska Board of Fisheries will consider 55 proposals at its Alaska Peninsula/Aleutian Island/Chignik Finfish meeting from February 20-25, 2023.

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the proposals and believes that adoption of any of these proposals will not have significant impacts on Federal subsistence users or fisheries. During the meeting, OSM may wish to comment on other agenda items that may impact federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to continuing to work with the Alaska Board of Fisheries and the Alaska Department of Fish and Game.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

cc: Federal Subsistence Board
Interagency Staff Committee
Benjamin Mulligan, Alaska Department of Fish and Game
Art Nelson, Alaska Department of Fish and Game
Mark Burch, Alaska Department of Fish and Game
Administrative Record

2/21/23 Office of Subsistence Management Statement Clarifying Federal Subsistence Jurisdiction

This Record Copy is submitted in response concerns voiced by the public to the letter (PC 118) submitted to the Alaska Board of Fisheries for this meeting by the Office of Subsistence Management (OSM). The following text is offered to clarify the scope of the jurisdiction which is adhered to when providing comments on proposals reviewed. Please see attached maps 8 and 9 which will illustrate Federal public lands and waters of the Aleutians, Alaska Peninsula, and Chignik Management areas.

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the proposals and believes that there are no proposals within Federal subsistence management jurisdiction that will have significant impacts on Federal subsistence users or fisheries.

Madam Chair, please retract RC 118 submitted by OSM prior to this meeting. We will reference the RC number assigned to this submission when addressing Federal subsistence related issues during the remainder of this meeting.

Thank you for your attentions in this matter,

George Pappas
USFWS Office Subsistence Management
State Subsistence Liaison

Aleutian Islands Area Subsistence Fishing



