



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

**In Reply Refer To:
OSM.24057**

MAY 21 2024

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 East Tudor Road, Mail Stop 121
Anchorage, Alaska 99503

U.S. Fish and Wildlife Service, Alaska Office
Sara Boario, Alaska Regional Director
1011 East Tudor Road
Anchorage, Alaska 99503

Dear Director Boario and Chairman Christianson,

I am writing to you on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council). The Council is asking the Federal Subsistence Board (Board) to support the replacement of the current U.S. Fish and Wildlife Service (USFWS) representative on the North Pacific Fishery Management Council (NPFMC) and for the USFWS Alaska Regional Director to make that change as soon as possible.

The Council attended an All-Council meeting in Anchorage in March 2024, where members from all 10 Subsistence Regional Advisory Councils were present. During that meeting, various concerns about bycatch and interception of subsistence resources, resulting in the depletion of subsistence resources, were shared by meeting attendees. They also expressed disappointment that no substantial action has been taken by NPFMC to address these concerns, despite numerous requests. Several of the Subsistence Regional Advisory Councils, including our Council, have submitted letters requesting that meaningful and prudent action be taken to address the Alaska salmon bycatch crisis.

During the All-Council Meeting, a small group of various Subsistence Regional Advisory Council members met to discuss submitting another joint letter to NPFMC regarding bycatch. Since the Southeast Council's bycatch letter was just finalized the week of the All-Council meeting, the Council chose not to sign on to the joint Council bycatch letter¹, but did want to send a letter to address new information learned that, apparently, the current USFWS representative on the NPFMC is not adequately fulfilling their role.

It is the Council's understanding that the USFWS representative does not regularly attend or participate in the NPFMC meetings. Nor has the representative brought forth any of the concerns of the Councils, specifically regarding bycatch or other concerns that may impact subsistence resources. Although this is a non-voting seat, the absence of someone actively engaged in this role is a wasted opportunity. The subsistence users' interests are not being communicated to the NPFMC, and there have been lost occasions to convey information learned from the NPFMC meetings back to the Board and Regional Advisory Councils. This lack of engagement should be remedied, and the agency seat should be filled with an active representative immediately.

Therefore, the Southeast Council requests that the USFWS Alaska Regional Director (USFWS Director) designate a different representative to fill that seat on the NPFMC and that the representative be someone who resides in Alaska. The Council would like to see this position filled with the USFWS Interagency Staff Committee member or with the Assistant Regional Director of the Office of Subsistence Management. Either of these two positions would offer a well-qualified replacement to fulfill the obligations of the USFWS seat on the NPFMC and would provide for better representation for subsistence concerns.

After the representative selection is made, regular attendance to NPFMC meetings by the new representative should be mandatory. Further, this representative should be required to provide routine information-sharing to and from NPFMC, the Board, and the Councils so that subsistence concerns are brought forward and elevated as necessary. It is imperative that the USFWS representative be knowledgeable with procedures of and actively engaged in the Federal Subsistence Management Program. To fulfill our Council Charter obligations, Council members must be knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife. Likewise, the USFWS representative to the NPFMC should possess qualified knowledge of ANILCA Title VIII to adequately represent federally qualified subsistence users' interests in this important forum.

The Council thanks you for your time in hearing the concern that several Subsistence Regional Advisory Councils have and would like to see resolved. We request the support of this Board in our request for the replacement of the current USFWS representative on the NPFMC. The Council thanks the USFWS, specifically the USFWS Regional Director, in advance for affecting this change. It is extremely important that the subsistence voice be heard in as many arenas as possible where management decisions have direct impacts on subsistence food sources.

¹ Joint letter on bycatch submitted by Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils dated March 28, 2024

If you have any questions regarding this letter, please contact me via DeAnna Perry, Subsistence Council Coordinator, USDA – Forest Service, at deanna.perry@usda.gov, or (907) 209-7817.

Sincerely,

A handwritten signature in cursive script, appearing to read "Donald Hernandez".

Don Hernandez
Chair

cc: Federal Subsistence Board
All Subsistence Regional Advisory Councils
Office of Subsistence Management
Interagency Staff Committee
North Pacific Fishery Management Council
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department Fish
and Game
Administrative Record