



# Federal Subsistence Board

1011 East Tudor Road, MS 121  
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FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

AUG 07 2024

In Reply Refer To:  
OSM.A24095

Robert "Charlie" Wright, Sr., Chair  
Eastern Interior Alaska Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1101 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6119

Dear Chair Wright:

This letter responds to the Eastern Interior Alaska Subsistence Regional Advisory Council's (Council) fiscal year 2023 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to respond to these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of the issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

## **1. Sheep population declines and need for coordinated survey efforts**

*Sheep populations throughout the Eastern Interior Region continue to be a major concern for the Council. Recent Wildlife Special Actions have closed sheep hunting in the Eastern Brooks Range and in Yukon-Charley Rivers National Preserve. In many Game Management Units (GMUs), sheep surveys are not conducted frequently enough to provide accurate population estimates and harvestable surplus information needed for sustainable management. The Council understands that weather conditions and budget constraints are limiting factors for annual surveys; however, because of the declining sheep numbers more frequent surveys need to be made a priority.*

*The Council continues to advocate for more collaboration between State and Federal partners to prioritize sheep surveys in our region and the rest of the state. We request to be informed about specific collaborative efforts between State and Federal agencies to prioritize sheep research and management in our region. The Council also requests a report that contains the most current sheep population data in Eastern Interior GMUs, including the dates of most recent surveys by area and recent harvest levels. Lastly, the Council requests any other available information on statewide sheep population trends.*

*The Council is aware of efforts by the Western Interior Alaska Subsistence Regional Advisory Council to develop Dall Sheep Management Guidelines. The Council would like to see similar Dall Sheep Management Guidelines developed for the Eastern Interior Region, and we request support from the Board to initiate that process. These management guidelines are needed*

*because of current sheep population trends and future uncertainties due to a changing climate. However, the Council strongly feels that for such efforts to be successful there needs to be buy-in from both State and Federal management agencies, and there must be a co-management or co-stewardship component included. It is the Council's hope that all parties will work collaboratively and expeditiously on this issue.*

*The Council would also like the Board to know that we supported Wildlife Special Action Request WSA24-01 to close sheep hunting to all users in the Yukon-Charley National Preserve south of the Yukon River. A similar emergency special action request was submitted by the National Park Service and approved by the Board for the 2023 hunting season. Sheep populations in the area have not had time to recover, and we feel the closure should remain in place through the 2025 hunting season and also be expanded to include Federal lands within the Glacier Mountain Controlled Use Area (CUA). Additionally, we ask that the Board encourage Alaska Department of Fish and Game (ADF&G) to close the remainder of the Glacier Mountain CUA due to extremely low sheep numbers.*

**Response:**

In response to concerns raised by the Councils about sheep, a sheep roundtable discussion session was held during the All-Council Meeting in March 2024. The Council will also consider Sheep Management Strategies for the Western and Eastern Interior Regions at their Fall 2024 meeting.

The Board took action on WSA24-01 during a meeting on May 23, 2024. The Board adopted WSA24-01 with the Council's suggested modification to extend the closure through the 2025/26 regulatory year. The Board partially adopted the Council's modification to include BLM lands within the Glacier Mountain Controlled Use Area (CUA). The Board only closed the BLM land near the North Peak Mountain area within the CUA, noting that the other BLM land was located in lower elevation areas that do not consist of quality sheep habitat.

Additionally, the Board reached out to BLM and NPS field staff in your region to request their input in response to sheep monitoring and collaborative efforts between agencies. The following is the response from BLM:

“The BLM Central Yukon Field Office lands are primarily located outside the Eastern Interior region. However, it may be of interest to the Council that we have an interagency agreement with the NPS to conduct surveys on BLM managed lands in the central Brooks Range. The majority of the survey area is in GMUs 24A and 26B (Western Interior Region) but it does include a small portion of GMU 25 near the Chandalar Shelf (Eastern Interior region).

The 2023 sheep survey summary is not yet complete but a copy of the 2022 summary has been enclosed for reference (see Topic 1 Enclosure A). We do not have population estimates for the total survey area (which includes the GMU 25 lands) for 2022 or 2023, as surveying such a large area is time and resource intensive and is difficult to complete within the scheduled survey dates. We do have estimates for the 1A/1B survey area for 8 of the last 10 years, which are useful to compare with ADFG's minimum count data. The focus of BLM's efforts has historically been to get this comparison data.

BLM agrees with the Council that there is room for improved collaboration between agencies to monitor and study sheep and will continue to actively pursue such opportunities.”

The following is a response from NPS:

“The NPS is very much in support of inter-agency collaboration on monitoring sheep populations and as noted has been working with BLM and also ADF&G on monitoring sheep in adjoining regions. NPS secured funding to conduct sheep population surveys in 2023 in Yukon-Charley Rivers National Preserve. The results of this survey indicated a 75% decline in the sheep population and subsequently led to Temporary Wildlife Special Actions that closed sheep hunting to all users within the Preserve in Units 20E and 25C in 2023 and through the 2024-2026 regulatory cycle. A report on the 2023 Yukon-Charley Rivers National Preserve sheep survey is enclosed (see Topic 1 Enclosure B). NPS hopes to secure funding to survey this area again in 2025.

Wrangell-St. Elias National Park and Preserve surveyed sheep in the northern Wrangell Mountain area in 2023. A brief summary report of that survey is enclosed (see Topic 1 Enclosure C). The northern Wrangell Mountain area contains the highest known number of sheep parkwide based on the last survey in 2010/2011. The park plans to continue to document changes in this area this year along with expanding surveys eastward into the Nutzotin Mountains and will also conduct sheep surveys in 2025.

A proposal was recently submitted for NPS funding to compare changes in sheep abundances across a pronounced south-to-north snow gradient across Wrangell-St. Elias National Park to investigate how snow, and other environmental factors, are contributing to changes in spatial patterns in Dall’s sheep abundance. If successful in securing the funding that survey work would likely begin 2026.

Additionally in an effort to document local and indigenous knowledge about Dall’s sheep, Wrangell-St. Elias National Park and Preserve staff recently interviewed eight long time area sheep hunters and hunting guides. Discussion topics have included their experiences with hunting sheep in the park, recent trends in sheep abundance and composition as well as environmental conditions and their potential impacts on sheep numbers.

NPS staff would be happy to provide the Council with further updates on these projects at your next meeting if requested.”

## **2. Management of Fortymile Caribou Herd**

*The Council remains concerned about management of the Fortymile Caribou Herd. The Fortymile Caribou Herd Harvest Management Coalition (Coalition) has been a successful working group in the past, but in recent years has not been utilized as it should. This is a high profile and road accessible herd, and the Coalition should therefore meet on at least an annual basis-- similar to the Western Arctic Caribou Herd Working Group-- to bring together the diverse stakeholders that utilize and depend on the herd.*

*The 2019-2023 Fortymile Caribou Herd Harvest Management Plan is due for an update. The*

*Council has historically had a representative on the Coalition that participated in its planning meetings, but we have not received notice of any plans to renew the Harvest Management Plan for 2024 onward. We request an update on when the Coalition will meet to review and update the plan. We also request that representatives from Yukon-Charley Rivers National Preserve be invited to participate in Coalition meetings.*

*The Council wants to emphasize that the Coalition process is extremely important for many stakeholders, including our Canadian neighbors. It should not be left up to only ADF&G to decide when the Coalition meets or to make changes to harvest strategies without consensus from the larger group of stakeholders. The U.S. Federal agencies involved in management of the Fortymile Caribou Herd need to take a more active role in the process of revising the Harvest Management Plan and in the on-going management of the herd. The Council asks the Board to discuss how the agencies represented by the Board can take a more active role. We would appreciate being briefed on the proposed solutions at our Fall 2024 meeting.*

*Given the recent declines in the size of the herd and the uncertainties of climate change, the Council makes the following management strategy recommendations: a more conservative harvest strategy must be implemented in the immediate future. The harvestable surplus should include a buffer to account for high mortality rates that result from extreme weather and other natural events. A harvest buffer should be used to prevent the entire harvestable surplus from being taken, leaving some additional animals to contribute to the reproductive pool and rebuilding of the herd.*

*The Council continues to have major concerns about safety, hunter ethics, and meat care during the fall caribou hunting season, especially along the Steese and Taylor highways. We are afraid that the recent Nelchina Caribou Herd closures will displace hunters and further increase pressure on the Fortymile Caribou Herd. The Council appreciates the information shared with us in the FY-2022 reply on this topic and all the work of law enforcement, agency staff, and volunteers to help monitor and mitigate some of these issues. However, due to the sheer number of hunters we still feel that more needs to be done in this regard. We seek information on what steps need to be taken to implement mandatory hunter check stations on the Steese and Taylor highways during the fall season hunts. We also want to know how to put into regulation a 100-foot set-back along the Steese Highway as a no hunting zone. This has been helpful along the Taylor Highway at mitigating safety and crowding concerns and would be similarly beneficial along the Steese Highway corridor.*

*Lastly, the Council would appreciate an update on whether the Bureau of Land Management (BLM) Eastern Interior Field Office was able to secure another grant from the BLM Office of Law Enforcement and Security to help fund additional patrol officers in the 2023/2024 season. The Council would gladly write letters of support for such endeavors in the future if it would be helpful for securing funding. BLM could notify the Council through our Coordinator in advance of our meetings whenever such a letter might be useful.*

### **Response:**

The Board received a letter from your Council regarding the need for the Fortymile Caribou Herd Harvest Management Coalition (Coalition) to meet and update the Harvest Management Plan. The letter was discussed at the Board's Summer Work Session in August and Board members expressed interest in exploring options to convene the Coalition. We will ask OSM or

agency staff to report any outcomes to you at your fall 2024 Council meeting. At this time, we are not aware of any planned Coalition meetings.

The Alaska Board of Game (BOG) considered State Proposal 113 addressing the set-back along the Steese Highway during their Interior/Eastern Arctic Region meeting in March 2024. State Proposal 113 requested closing caribou hunting within ¼ mile or 100 yards of the Steese Highway above tree line on Eagle and Twelvemile summits in Unit 20. The BOG amended the proposal to set a 100-foot buffer for caribou hunting, between specific mileposts to be set by ADF&G. The BOG noted ambiguity of tree line as a descriptor and that specific mileposts will reduce confusion.

Additionally, the Board reached out to BLM to request their input on this topic. The following is their response:

“The BLM Eastern Interior Field Office (EIFO) shares the Council’s concern about safety, hunter ethics, and meat care during the fall Fortymile caribou hunting season, especially along the Steese and Taylor highways and has worked hard to ensure adequate presence of law enforcement and other field staff.

The single BLM Law Enforcement Ranger assigned to the Eastern Interior Field Office patrols Fortymile Caribou Herd Hunt zones periodically from August 1 through March 30 and daily during the early weeks of the fall season. During the 2023 fall State season in the Steese Highway area, 4-5 Alaska State Wildlife Troopers with a helicopter were based at the BLM Central Field Station and three USFWS Law Enforcement Officers joined three BLM Rangers recruited from other BLM offices in patrolling the Steese highway area. Three ADFG biologists and a BLM biologist gathered biological specimens and measurements for animal condition monitoring. And in the days prior to and for the duration of the Steese season, five EIFO recreation and wildlife personnel were in the area, contacting hunters and posting and sharing information about new OHV regulations. In total, 10-11 Law Enforcement officers and five BLM field personnel were communicating with and observing hunters in the Steese area during the short four-day Steese Fall hunt.

The participation of USFWS Law Enforcement Officers is dependent on establishment of a funded Interagency Agreement. BLM EIFO has recently learned that it has been successful in again receiving funding for 2024-25.”

### **3. On-going Yukon River Chinook and Fall Chum Salmon crisis**

*Summer of 2023 was the fourth year in a row with dismal returns of Yukon River Chinook, Fall Chum, and Coho salmon to the Yukon River drainage. Border passage goals and Pacific Salmon Treaty obligations were again not met even though subsistence fishing was closed for Chinook and Fall Chum salmon. Limited fishing for Summer Chum Salmon was allowed in the lower river, but all salmon fishing was completely closed again in our region. And while local fishers went without much needed salmon for their families and communities, Yukon River salmon continued to be bycaught in the Bering Sea and intercepted in the Alaska Peninsula commercial fisheries. The subsistence priority is not being upheld. We suggest that an opinion from the Solicitor may be needed to determine if and how the subsistence priority in ANILCA and the State of Alaska Constitution can be enforced across Federal-Federal and Federal-State jurisdictions and would appreciate being briefed on their opinion.*

*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. The Council strongly feels that this issue needs to be elevated and addressed by the highest levels of government. Last year, we asked the Board to act on this, and if needed, to seek guidance from the Secretaries of the Interior and Agriculture (Secretaries) on how to do so. The Council kindly requests an update on how the Board addressed this request and details on any guidance received from the Secretaries. If no guidance has yet been received, the Council asks the Board to respectfully notify the Secretaries of this outstanding request and need for urgent action.*

*Additionally, the Board also forwarded a letter to the Secretaries that the four Yukon River Councils co-authored in 2022, but we have not yet received a response from the Secretarial level. Again, the Council asks the Board to respectfully notify the Secretaries of this outstanding request and need for urgent action. We also request that the Board work with the Secretaries' Offices and Office of Subsistence Management (OSM) to find ways that this correspondence process can be improved and to ensure that the Councils receive direct responses in the future, and we would like to be briefed on the outcomes.*

*The Council is aware that the Departments of the Interior and Commerce have held listening sessions on salmon issues, but it is still unclear how the Departments of the Interior and Commerce are going to work together to rebuild salmon stocks and protect subsistence. We request to be informed on how the Departments are collaborating, not only on research, but on policy and management revisions to protect our salmon stocks and subsistence.*

**Response:**

The Board values your Council's continued diligence to address salmon declines and, like you, remains concerned about Yukon River salmon stocks and how the low returns impact subsistence practices and traditions. When the Board met with the Secretary of the Interior in October 2023, it shared Councils' concerns regarding catastrophic declines in salmon and requested the Secretary to advocate for ecosystem scale collaborative salmon management in Arctic-Yukon-Kuskokwim and Southeast regions to ensure continuation of subsistence uses including working their Administration counterparts, engaging in scientific collaboration with the Department of Commerce, and encouraging joint Tribal consultations between the Board and North Pacific Fishery Management Council. These requests were further reiterated in the meeting follow up memo from the Board to the Secretary of Interior and the Secretary of Agriculture (Topic 3 Encl. 1).

On March 6 during the joint session at the 2024 All-Council Meeting, ten Subsistence Regional Advisory Councils met and discussed the issues of need for timely and meaningful action related to the bycatch and interception of subsistence resource in commercial fisheries in the Gulf of Alaska and the Bering Sea. Seven Councils voted to be signatories on a joint letter to the Board outlining their concerns and requesting proposed actions including holding a meeting between the Secretaries or their Under Secretaries, the Board, and the Council Chairs. The Board elevated this letter from the seven Councils to the Secretaries on July 29, 2024 (Topic 3, Encl. 2). In all our transmittal letters the Board asks the Secretaries to identify a point of contact within their offices to confirm correspondence and to communicate regarding updates and follow through.

OSM staff are making efforts to connect with representatives from the Secretary of the Interior's Office to check on past requests, such as the request to liaise with the Department of Commerce about salmon bycatch and to inquire about new issues such as the Pacific Salmon Treaty, ecosystem based salmon management across jurisdictions, and the role the Board and/or OSM staff may take to provide comments to the North Pacific Fishery Management Council and the Alaska Board of Fisheries. We look forward to sharing a response with the Council as soon as we have it.

The Board continues to confer with the Regional Solicitors Office on these issues and receives guidance and support on the scope of their authority to act within the limited arena of Federal subsistence fish and wildlife regulations.

#### **4. OSM's inaccurate characterization of the impacts of Alaska Board of Fisheries proposals to subsistence**

*Last year, the Council notified the Board about our concerns regarding the comment letter submitted by OSM to the Alaska Board of Fisheries (BOF) about 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".*

*As we noted in our FY-2022 Annual Report, the statement made by OSM was 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. 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. There were record numbers of testifiers at the 2023 Alaska Peninsula/Aleutian Islands/Chignik Finfish 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 2023. 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. In the Board's FY2022 Annual Report Reply on this topic, it was stated that "OSM will work with the Interagency Staff*

*Committee and the Board to reevaluate OSM's current BOF and Alaska Board of Game comment practices. Once this review is complete, OSM will update your Council and other Councils to seek their input on a revised process." We anxiously await an update on the new policies that are being put in place given the severe concerns for AYK subsistence salmon recognized by the Board and many Councils.*

*The Board will also be receiving another joint letter from several Councils requesting meaningful action on salmon crises and bycatch issues. We ask that the Board respond in a timely manner to the requests in that letter. We also request that the Board take a stronger advocacy role to protect our salmon and subsistence uses in other regulatory arenas.*

**Response:**

The Board concurs that the original OSM proposal comment letter to the BOF was inaccurate. The Board acknowledges that just because BOF proposals take place outside of Board jurisdiction, it does not mean they have no impact on subsistence uses on Federal public lands and waters. The Board acts under the authority of the Secretary within the limited arena of fish and wildlife regulations on Federal public lands and waters. Solutions to the impacts on subsistence uses that cannot be addressed by Federal fish and wildlife regulatory changes is under the purview of the individual agency Directors, State managers, or the Secretaries themselves. The Interagency Staff Committee and OSM have reviewed OSM's past practices for submitting comments to the Alaska Boards of Fisheries and Game. They concluded that OSM's Board comment practices are consistent with Federal Subsistence Management Program authorities and that the comment in question contained a sentence that was phrased incorrectly. The Board thanks the Council for bringing this to OSMs attention so they could make the necessary adjustment to that comment and future comments.

Further, as stated earlier, we have shared all joint Council letters with the Secretaries and are requesting points of contact within the Secretaries' offices to track these issues and ensure a follow through.

**5. Hatchery salmon competition with wild salmon**

*The Council continues to be concerned about competition between wild salmon and hatchery salmon. Particularly concerning are the 1.9 billion Pink Salmon released from hatcheries every year. Research shows that Pink Salmon compete for food with other species of Pacific salmon and have notable impacts to the diet, growth, fecundity, productivity, and abundance of other salmon and other species in the marine environment<sup>1</sup>.*

*The Council asks the Board to take action and request that the State of Alaska reduce hatchery production so that our struggling wild salmon stocks have a better chance at health and survival. This is another issue that may not be within complete jurisdiction of the Board, but it nevertheless directly affects federally qualified subsistence users and the resources we rely on. We request that this issue be elevated to the Secretarial level if the Board requires additional guidance.*

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<sup>1</sup> Ruggeroni GT, Springer AM, van Vliet GB, Connors B and others (2023) From diatoms to killer whales: impacts of pink salmon on North Pacific ecosystems. *Mar Ecol Prog Ser* 719:1-40. <https://doi.org/10.3354/meps14402>



*The Council is opposed to any hatcheries or in-stream egg incubation on the Yukon River. We are aware that the U.S. Fish and Wildlife Service published a position in opposition to artificial propagation of Yukon River salmon in 2016<sup>2</sup>. Since that time, Yukon Salmon have continued to decline. We request that the Board affirm and USFWS re-affirm a position in opposition to artificial propagation of salmon on the Yukon River. Instead of hatcheries and other artificial propagation techniques, the Yukon River needs a long-term salmon rebuilding plan that is rooted in ecosystem-based management principles, cross-agency collaboration, and a conservation-minded harvest management strategy that is applied fairly to all users.*

**Response:**

The Board shares your Council's concern for the negative impacts of hatchery released Pink Salmon upon wild salmon stocks in the marine environment. We recognize your expressed interest in having this concern noted for the record and elevated to both the Secretary of the Interior and Secretary of Commerce (Secretaries). We further acknowledge your Council's request to the Alaska Department of Fish and Game to reduce the hatchery production of Pink Salmon to minimize competition between wild and hatchery produced salmon over food resources in the marine environment. The Federal Subsistence Management Program's scope of regulatory authority on this topic is limited. Although it is beyond the Board's direct authority, we are supportive of the Council writing letters to express your concerns to the Alaska Department of Fish and Game (ADF&G) and the ADF&G Salmon Fishery Enhancement and Hatchery Program. The Board urges the Council to remain vigilant in voicing these concerns to ADF&G and engaging in their regulatory process.

The Council may request their Council Coordinator to contact the ADF&G's Salmon Fishery Enhancement and Hatchery Program and request a representative attend the next Regional Advisory Council meeting to present on interactions between wild and hatchery released salmon and competition for food resources in the marine environment.

The Board acknowledges the Council's opposition to any hatcheries or in-stream egg incubation on the Yukon River. Further we acknowledge the U.S. Fish & Wildlife Service's position and perspective on artificial propagation of Yukon River Chinook Salmon as documented in the enclosed flyer from 2016 titled Artificial Propagation of Yukon Salmon: An Agency Perspective (Topic 5 Encl. 1). You can also learn more about the issue of hatcheries impact on Chinook Salmon in the enclosed Recovery of the Yukon River Chinook Salmon Fishery: An Argument for Harvest Management Rather than Hatchery Supplementation (Topic 5 Encl. 2). Moreover, for your information we enclose the Ruggerone et al. 2012 paper that deals with evidence that Norton Sound Chum Salmon are impacted by the large numbers of hatchery Chum Salmon in the North Pacific, where they spend the winters and most remain there during summers as well (Topic 5 Encl. 3).

**6. Need for updated moose counts along Yukon River corridor in Unit 20F**

*The Council has requested population estimates from the State of Alaska for moose in Unit 20F for the past few years but has not yet received a report concerning this topic at any of our Council meetings. Most of the land in Unit 20F is State-managed land; however, there is also*

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<sup>2</sup> U.S. Fish and Wildlife Service (2016). Artificial propagation of Yukon River salmon: an agency perspective.

*BLM land in this area. Residents of Rampart and Tanana, located within Unit 20F, and nearby Manley Hot Springs (Unit 20B) have been unable to harvest sufficient moose to meet subsistence needs in recent years and the effort required to successfully harvest a moose has greatly increased. 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 part of the region, and that these data should be used to inform hunt management instead of relying on harvest reports to estimate population. At our fall 2023 meeting, the Council voted to write a letter to ADF&G requesting the population data since our previous requests for moose population and harvest information have not been met through other channels. We have not yet received the requested information and kindly ask the Board to coordinate with ADF&G to obtain it, as well as to explore options for coordinated moose survey efforts in this area.*

**Response:**

The Board understands the importance of up-to-date research and populations surveys. The Board cannot direct ADF&G to conduct population surveys and does not have the funding to support such an endeavor. However, OSM staff will reach out to ADF&G to enquire about this information. If no response is received, the Board also might consider writing a letter to ADF&G with the same enquiry.

**7. Food insecurity and the need for food sovereignty**

*Residents of the Yukon River drainage are experiencing unprecedented food insecurity. In the upper Yukon River, there have been four 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 in previous topics. These resources are not abundant enough to serve as a replacement to the missing salmon, and we have no other species in our region that can provide a long-term sustainable alternative.*

*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 being faced. Additionally, receiving salmon “handouts” does not fulfill 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.*

*In the FY-2022 reply on this topic, the Board informed us of the availability of Cultural and Educational Program subsistence harvest permits. The Council recognized that these permits are a tool during times of conservation because they allow very limited harvest to still occur and some traditions to continue to be practiced. However, relying on such permits is a short-term “band-aid” and is extremely limiting. The Council would like to know what other actions the Federal agencies represented by the Board are taking to directly address food insecurity and what actions are being taken to develop a long-term plan for rebuilding salmon stocks. We are aware of the proposed increase to the Canadian-origin Chinook Salmon escapement goal to 71,000 fish, but that escapement goal will not be met without additional actions taken to address what is happening in the marine environment.*

*The Council also expresses a need for food sovereignty. Prior to the arrival of State and Federal governments to Alaska, Alaska Natives and rural Alaskans were able to feed themselves but now cannot. It feels to many people that management agencies are playing with our food and not listening to recommendations for management that are based on local and Indigenous knowledge. We want to re-emphasize the disproportionate burden of restrictions that has placed on subsistence users in the name of conservation, and again we request that the Board advocate for our subsistence rights and a subsistence priority in all management arenas.*

**Response:**

The Board would like to thank the Council for bringing this issue to our attention. We recognize that food insecurity and the need for food sovereignty remain significant concerns for subsistence users in your region. The Board appreciates and values the traditional knowledge, observations, and expertise you share that helps us track this issue and make informed decisions. Your insights are especially appreciated given the overall lack of data on food insecurity in rural Alaskan communities, particularly as it pertains to traditional and subsistence foods. Below is information about available tools and actions being taken by the Board and the Federal agencies it represents to address food insecurity and food sovereignty in your region. The Board recognizes that these actions have not eliminated food insecurity in your region and recognizes that addressing these concerns will require continual and collaborative effort between local, Federal, and State entities.

At the March 2024 meeting of all Regional Advisory Councils, the Office of Subsistence Management (OSM) coordinated sessions on co-stewardship and on food security and climate change. The goal of these sessions was to create opportunities for collaborative discussion to better understand local users' experience of these issues. Taking from statements made at these sessions, regional Council meetings, Tribal and ANSCA consultations, and other meetings, OSM is currently developing guidelines to better incorporate co-stewardship in activities with Councils and other partners. OSM will provide updates regarding these guidelines as they are developed.

The Board would like to highlight tools within the Federal Subsistence program that may help address food insecurity, including proposals to changing hunting and fishing regulations, Special Action Requests, and requests to delegate Board authority to Federal land managers, which can help facilitate faster responses to changing conditions. Federally qualified subsistence users may also be able to harvest during closure periods for traditional religious ceremonies or under cultural and educational harvest permits. The Board appreciates that the Council is aware of these tools and recognizes the Council's comments that some of these tools provide only short-term solutions.

In recent years, the Board approved several Special Action Requests that applied to your region, some of which were aimed at addressing issues leading to food insecurity (FSA 22-01, FSA 24-01, and WSA 22-03). The Board recognizes that while Special Action Requests are frequently able to provide a meaningful priority for subsistence uses, they rarely help to address food insecurity in all cases, such as when no harvestable surplus of salmon is available along the Yukon River.

Beyond FSB tools and actions, the Federal agencies represented by the Board are also engaged in addressing food insecurity and food sovereignty across Alaska. Recently, the U.S. Fish and

Wildlife Service (USFWS) attended the meeting of the North Pacific Fishery Management Council in their non-voting capacity to elevate subsistence users' concerns to this body. Additionally, USFWS and Bureau of Land Management (BLM) are implementing the Gravel-to-Gravel Keystone Initiative, which aims to build a foundation for co-stewardship and respond to the salmon crisis in the Arctic-Yukon-Kuskokwim regions.

The U.S. Department of Agriculture (USDA) has provided funding to address food insecurity to the Alaska Native Tribal Health Consortium through The Food Distribution Program on Indian Reservations program, though no communities in your region directly benefited from this funding. The Board notes that all Federally recognized tribes are eligible to administer this program and can contact the Alaska Native Tribal Health Consortium for information on applying for these funds. The USDA has also funded the Microgrants for Food Security Program, which is administered through the Alaska Department of Natural Resources Division of Agriculture. This program provides small grants to individuals or local entities addressing food insecurity in their area and may be a resource for residents in your region to consider in future funding cycles. The Board recognizes that these programs do not provide traditional foods and do not address the important role of practicing subsistence activities but believes that they may be valuable resources for communities during times of crisis.

The Council may already be aware of the Indigenous Foods Committee of the Alaska Food Policy Council. This committee works to identify and support policy that helps ensure continued access to traditional use harvest areas, opportunities for funding and technical support, and strengthened relationships between State and Tribes to support food sovereignty and security. The committee meets once per month and states that they are recruiting participants to increase scope and capacity of their work. The Council may wish to explore whether this group may be an additional venue through which to strengthen efforts to address food insecurity.

#### **8. Need for more co-stewardship and co-management**

*The Council would like to see greater cooperation between agencies and local entities and more meaningful incorporation of local and traditional knowledge into fish and wildlife management. We would like to be briefed by each management agency in our region to learn about the current and prospective co-stewardship and co-management agreements with rural communities, Tribes, and Alaska Native Organizations in the Eastern Interior Region. We kindly ask that each Federal agency that provides a written report to the Council include co-stewardship or co-management as a section in their reports moving forward. The Council also looks forward to being presented a summary of the outcomes of the Co-Stewardship Talking Circles and Symposium at future meetings.*

*During our Fall 2023 meeting, the Council identified two opportunities for co-stewardship/co-management that we believe would be mutually beneficial to agencies and local people. The first is for the Arctic National Wildlife Refuge (NWR) to enter into an agreement with the Arctic Village Council and Native Village of Venetie Tribal Government regarding cooperative monitoring and management of sheep in the Arctic Village Sheep Management Area. The second is for the Yukon Flats NWR to identify opportunities for local communities and Tribes to become more formally involved in Refuge management activities given the Refuge's complexing and downsizing of staff. The Council recommends that the Board support agency staff to pursue these opportunities and continue to identify others.*

*The Council wants to see co-stewardship policies and implementation continue to improve and expand with the end goal of Tribes becoming equal partners in management. Currently, Tribes fill an advisory role at best, and there is a lot of work yet to be done for true co-stewardship to come into existence.*

**Response:**

The Board appreciates learning about your Council's interest in seeing co-stewardship policies and implementation expand. The Board will advise Federal agency staff to include their co-stewardship activities as part of their reports to the Council from now on. The Board also reached out to the U.S. Fish and Wildlife Service (Service) with a request for further information and received a following response:

As mentioned by your Council, a Co-Stewardship Symposium was held by the [U.S. Fish and Wildlife Service] Service and in partnership with others in Fairbanks in mid-January. We encourage your Council Coordinator to invite those that hosted, facilitated, and/or participated in the Co-Stewardship Talking Circles/Symposium to share their experiences with your Council. The Service has a summary to share:

“The meeting was well attended by a diverse group of Tribal representatives, conservation organizations and agency staff from all areas of Alaska. The focus of the meeting was building relationships and a better understanding of what co-stewardship and co-management means to Federally qualified users who participated or provided input to the talking circles meetings across Alaska. There was much consensus that there is a need for increased Indigenous representation in all areas of resource management, on councils, and any bodies making decisions about fish and wildlife resources. Implementing co-stewardship in current management processes will require commitment, flexibility, and a long-term outlook. Similarly, there was a clear request to elevate Indigenous Knowledge as part of all management frameworks, including fisheries.”

The Arctic NWR appreciates that the Council identified opportunities for co-stewardship/co-management between agencies and Tribes. The Service identified co-stewardship as a priority for all its programs including NWRs. To this end, the Arctic NWR continues to work with the Native Village of Venetie Tribal Government, Arctic Village Council, and Venetie Village Council (collectively, Tribes) to identify opportunities for co-stewardship of sheep in the AVSMA [Arctic Village Sheep Management Area]. One of the approaches we've taken is for a study, with the Tribes' approval, of the cultural significance of sheep in the AVSMA to the Gwich'in. Although we were not able to pursue this project this year, we continue to seek other avenues for co-stewardship with the Tribes.

The Federal Subsistence Board also sent a letter to Tribal leaders about options to protect the AVSMA (see Topic 8 Enclosure). This was in response to concerns discussed during a tribal consultation held in Arctic Village in October 2023.

Regarding the complexing of Kanuti and Yukon Flats NWR, the Service would like to clarify that this proposal has not been formally implemented as the Service continues to consult with affected Tribes. Over the past decade, the NWR Systems funding has

declined over 25%, and the FY2024 budget for Refuges in Alaska is especially challenging. Partnerships with Tribes and rural communities are needed more than ever for the successful conservation of nature on all NWRs in Alaska.

Please note that the number of staff of Yukon Flats NWR has declined over the past decade. However, engagement with Tribes and ANCSA corporations has increased because staff have shifted work priorities and funding toward co-stewardship. Consultation is now offered when substantive decisions are considered. Staff annually partner with a local community and host an open house event with refreshments provided by the Friends of Alaska National Wildlife Refuges.

Additionally, the annual funding agreement (AFA) between the Yukon Flats NWR and Council of Athabascan Tribal Governments (CATG) has also grown since established in 2004. Here are a few, notable recent accomplishments:

- For last the last decade continued outreach and other work outlined in the Yukon Flats Cooperative Moose Management Plan.
- In 2019 the AFA included a high priority for the Council and the Board - the hunter liaison project. The last three years, the manager leveraged Service dollars with the National Park Service to support the liaison that works in Circle.
- In 2020, the Eyes in the Bush program was added to the AFA. The program, in partnership with the Indigenous Sentinels Network, employs local residents to conduct wildlife, habitat and other environmental monitoring. The lead Refuge biologist supports these sentinels and has brought many partners to the program to support CATG.
- The Service also supported a part-time liaison position in 2023 through the Northern Latitudes Partnership to support and expand the Eyes in the Bush program. Throughout 2023 and in early 2024, this liaison reached out to Tribes of the Yukon Flats to learn what they would like to see in the Eyes in the Bush program. There has been an expression of interest by some tribal members for all the councils to gather and discuss the program.

As Service staffing declines alongside budgets, the need for experienced environmental observers will continue to grow. Without these workers, the essential inventory and monitoring work that the Council, the Board, and the State of Alaska depends upon are likely to decline. The Yukon Flats NWR invites partnerships with Tribes to explore opportunities to address our mutual interests.

Regarding identifying opportunities to become more formally involved in Yukon Flats NWR management activities, the Refuge would like to clarify that Federal management of NWRs is limited in scope and rarely involves harvest of fish and wildlife. While the Board may delegate authority to refuge managers to manage Federal subsistence hunts (or fisheries), the only wildlife harvest authority currently held by the Yukon Flats NWR manager is to close the Unit 25D West Federal moose hunt when the harvest quota is reached, which has never happened in the history of the hunt.

However, the manager can make decisions related to inventory and monitoring of wildlife. In the spirit of co-stewardship, in 2002, Staff of Yukon Flats NWR worked with ADF&G, Yukon Flats Moose Management Planning Committee, Yukon Flats Fish and Game

Advisory Committee, CATG and the local Tribal governments to develop the Yukon Flats Cooperative Moose Management Plan.

Commonly refuge managers, with delegation from the Secretary of the Interior and Service Director, also review and issue permits for public uses (e.g., five-year trapping and subsistence cabin use permits, annual air taxi operator permits, scientific research permits, limited five-year big game hunting guide permits, etc.). Permits allow activities in compliance with all Federal laws and Service policies ensuring those activities are lawful and compatible with refuge purposes, which includes the opportunity for continued subsistence uses.

Last year, the staff of Yukon Flats NWR completed a mandatory review of most public uses of the refuge for compatibility with refuge purposes and the Service mission and completed ANILCA Section 810 review of those uses. Over the course of nearly two years, the manager invited Tribes to consult on those reviews. The most common concern heard was related to unguided sport hunters trespassing on private lands and only being interested in antlers. The Yukon Flats NWR manager lacks authority over trespass on private lands by unguided sport hunters. However, Federal Wildlife Officers conduct patrols on lands and waters of the Refuge to ensure compliance with State and Federal regulations and investigate complaints of trespass on adjacent private lands.

#### **9. Need for hunter ethics education**

*The Council thanks the Board for their letter of support for our Hunter Ethics Education and Outreach Initiative dated October 26, 2023. At our fall 2023 meeting, four of our Council members volunteered to be part of a working group to continue making progress on the initiative. The group met in late 2023 to identify some short-term goals to work towards. These goals include: 1) develop outreach materials that explain what hunter ethics means, 2) develop outreach materials about how to donate excess or unwanted meat, organs, and other useable animal parts, 3) put information about hunter ethics and proper meat care on the Federal Subsistence Management Program Website and link to that page on each Federal agency website, and 4) begin exploring options for hunter check stations on the Steese and Taylor Highways. The working group plans to meet again in early 2024 to further work on these goals prior to presenting back to the Council at the All-Council Meeting.*

#### **Response:**

Thank you for providing the update to us. The hunter ethics education and outreach is an important topic in many regions of Alaska, and we are pleased to hear that your Council is making progress on this initiative.

#### **10. Climate change impacts**

*The Council would like the Board to be aware that residents of the Eastern Interior 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 has begun to receive proposals requesting season extensions for fall moose hunts in various regions. The Council encourages the Board to*

*adopt these proposals wherever appropriate so that resource management can be adaptive to changing conditions.*

*The Council recommends that all fish and wildlife populations must be managed on a long-term plan and not a year-to-year harvest plan. Management needs to stop being based on maximum sustained yield. Because the impacts of climate change are largely unknown, management must be a lot more cautious now than ever before. We cannot keep managing how things have been done in the past and instead must focus our goals on long-term consistent, reliable access to resources.*

*The Council also requests to be briefed on how the agencies represented by the Board are monitoring impacts of climate change in our Region and across the state, how local resident observations and traditional knowledge is being incorporated into that research and monitoring, what some of those findings are, and how agency policies and management strategies are being adapted in light of the findings.*

**Response:**

Thank you for bringing the issue of climate change impacts to the Board's attention once again. The Board is fully aware of the breadth and depth of the effects of climate change on the people and landscapes of Alaska. We take this issue seriously and acknowledge that it's a major threat to the cultures of the people who live here. We also acknowledge that climate change is an intractable global problem. As community leaders and land managers, we are committed to doing all we can within our capacity to address this issue here in Alaska, and to carry this message and your concerns to our national agency colleagues. As we stated in the FY2022 annual report reply, "The Federal Subsistence Management Program can support adaptation to changing climatic and environmental conditions by ensuring a regulatory process that facilitates flexibility. A responsive regulatory process can also ensure that people continue to access healthy local and traditional foods during times of unexpected shortage." This can be done through proposals requesting season changes that work better in the changed climatic conditions. If a more immediate response is necessary, the Program can do it through Special Action process or by delegating authority to local land managers.

We agree that all fish and wildlife populations need to be managed on a long-term plan and would like to clarify that the Program doesn't have harvest plans, nor does it manage on maximum sustained yield.

In 2021, Department of the Interior developed Climate Action Plan, which is available online at <https://www.doi.gov/sites/doi.gov/files/departments-of-interior-climate-action-plan-final-signed-508-9.14.21.pdf> The Departmental Climate Action Plan highlights that rural, Indigenous, and Tribal populations are disproportionately affected by the climate change impacts. In the Department's Policy Statement for Climate Adaptation and Resilience Secretary of the Interior Haaland says that "planning and decision-making will use the best-available information that considers existing and projected climate change vulnerabilities, risks, and impacts. Decision-making will also consider traditional knowledge, and the Department will meaningfully consult with Tribes and other Indigenous communities throughout decision-making processes that affect their interests."



The Board reached out to the Federal agencies in your region and found out that there are several on-going efforts to monitor impacts of climate change in your Region and across the state, many of which incorporate resident observation and traditional knowledge. In April 2024, the U.S. Fish and Wildlife Service completed Climate Action Plan for Alaska Region that outlines many of these initiatives (Topic 10, Encl.). You can also more about the U.S. Fish and Wildlife Service strategies to address climate change at <https://www.fws.gov/initiative/climate-change>. In your region, Yukon Flats National Wildlife Refuge is doing the excellent work documenting environmental changes and involving local residents in these projects. You can learn more about their work in their on-line publication Yukon Flats changing environment (<https://www.fws.gov/sites/default/files/documents/Yukon%20Flats%20Changing%20Environment.pdf>).

The U.S. National Park Service (NPS) also is involved in many projects monitoring climate change and engaging traditional ecological knowledge. You can learn more about NPS strategies to address climate change on this page: <https://www.nps.gov/subjects/aknatureandscience/ccaction.htm> and how Indigenous and traditional knowledge is utilized to adapt to climate change on this page: <https://www.nps.gov/subjects/aknatureandscience/ccik.htm> For the interior regions of Alaska the best source to find out how resources are impacted by climate is the Central Alaska Inventory and Monitoring Network (<https://www.nps.gov/im/cakn/index.htm>). The Board will request that OSM invites representatives from the agencies to provide an overview of the ongoing programs and projects.

### **11. Support needed for subsistence education and culture camps for children and youth**

*The Council continues to feel that subsistence education and culture camps need more funding and support, especially in communities 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.*

*The Council would like to be briefed on how many youth science or cultural camps and educational programs are supported annually by Federal agencies in our region. Additionally, we would like to know how funding opportunities can be made available for educational programs and cultural camps that are not necessarily tied to research projects, as is the current requirement of the Fisheries Resource Monitoring Program (FRMP). What actions need to be taken so that the FRMP could set aside a certain proportion of funding to be specifically allocated for such educational programs and culture camps?*

#### **Response:**

The Board agrees with the Council that passing down generational knowledge and engaging youth in subsistence harvesting through science and culture camps is a priority. At this time, FRMP funds can only be used for Federal subsistence fisheries monitoring projects. However, the Board has identified the Partners for Fisheries Monitoring Program (Partners Program) as a funding vehicle for youth science and culture camps. The Partners Program was designed to strengthen Alaska Native and rural involvement in Federal subsistence management. Funds from the program can be used to support locally-developed opportunities for students to connect with subsistence resources through science and culture camps and paid internships. These

science and culture camps are not required to be tied to a research project, but they must be tied to Federal subsistence fisheries management.

The next opportunity to apply for funding through this program will be in the fall of 2024 or the winter of 2025. The opportunity to apply for funding from the Partners Program occur every two years and projects may be funded for four years. Partners funding is available to rural and Alaska Native organizations. Partners Program funds can be used to pay salaries for a fisheries biologist, an anthropologist, or an education/outreach specialist. Many Partners proposals are for four years of salary for fisheries biologist. However, a rural or Alaska Native organization could apply for funding to pay for the salary of an education/outreach specialist who would organize and facilitate an annual science/culture camp that is not tied to a research project. Partners funds can be used to implement the camp including contracts, supplies, and rent. If an organization wanted to hire someone only to manage a science/culture camp, this position could be seasonal or part-time.

Any organizations interested in applying for Partner Program funding are encouraged to reach out to the following OSM Partners Program staff with any questions:

- Karen Hyer, [karen\\_hyer@fws.gov](mailto:karen_hyer@fws.gov), 907-786-3689
- Liz Williams, [ann\\_williams@fws.gov](mailto:ann_williams@fws.gov), 907-764-0141

Federal agencies in Alaska are also involved in many science/culture camps throughout the state. Often, a Federal agency is one partner among other lead partners who plan and implement science/culture camps. If you would like to start a new science/culture camp, you will need to contact OSM staff. The cultural/educational permit requirements are in the enclosed 50 CFR 100.25 (g) and (h) with highlighted section applicable to these requirements (Topic 11 Enclosure).

Below are some examples of camps that Federal agencies in the Eastern Interior Region have recently assisted with:

#### Culture Camps that included National Park Service as a Partner

- Denali National Park and Preserve partnered with the Nenana Tribal Council in 2023 and 2024
- Wrangell-St. Elias National Park and Preserve partners annually with Batzulnetas culture camp

#### Culture Camps that included U.S. Fish and Wildlife Service as a Partner

- Yukon Flats and Arctic National Wildlife Refuge staff partner annually with Venetie Culture Camp, along with Council of Athabascan Tribal Governments, Tanana Chiefs Conference, and Arctic Village
- Tetlin National Wildlife Refuge staff partner annually with Northway and Tetlin community culture camps.

## **12. Use of cabins on Federal public lands for subsistence activities**

*The Council remains concerned about the “red tape” that exists for subsistence users to utilize cabins on Federal public lands while carrying out subsistence activities such as trapping. Many such cabins existed and were being used by rural residents prior to ANILCA. 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 Federal agencies. Subsistence users should be encouraged, not discouraged, to use public use cabins.*

*In the FY-2022 Board's annual report reply on this topic, BLM notified the Council that cabins are not available for subsistence uses because the BLM is constrained by regulations and fee schedules that do not allow for them. Therefore, the Council requests that BLM change their policies and regulations so that cabins can be used for subsistence purposes such as trapping without incurring fees to subsistence users. We request to be briefed on the steps necessary to make this happen so that the Council may support or engage in the process as appropriate.*

*The Council strongly maintains that there should be a distinction made between the permits, leases, and fees required for subsistence users versus for commercial/sport 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. Most rural residents and subsistence users have limited income, and the application fees to utilize BLM cabins are cost prohibitive.*

*The Council asks the Board to urge the BLM to change their policies for public use cabin permits for subsistence users in order to make it easier for rural residents to continue their traditional practices out on the land. The Council will also be writing a letter to BLM asking for policy and regulatory changes related to cabin use, and we look forward for hearing back from BLM about how the Council might support or engage in helping implement such changes.*

*The Council also recognizes that cabin use issues extend on other Federal lands as well. In 2019, Congressman Young and Senator Sullivan petitioned the Secretaries to address the inconsistencies in how Federal land managing agencies implement cabin use policies under ANILCA (Enclosure 1). The Secretary of Interior responded with a commitment to improving the clarity and consistency of such agency policies (Enclosure 2). The Council requests to be briefed on the outcomes of this work. If this work has stalled, the Council requests that the Board elevate this issue to the Secretaries and the Alaska Delegation to request that it is once again made a priority.*

**Response:**

Thank you for bringing this topic to the Board's attention again this year. BLM has noted that they received your letter on this topic, and they provided the following response:

As explained in BLM's response to the Council's inquiry on this issue last year, the fees for an authorization to construct shelters, temporary or permanent, on BLM-managed land are governed by regulation. Fees can be waived or reduced under limited circumstances, and it is the responsibility of the applicant to demonstrate that their specific circumstances meet the criteria for waiver or reduction. We understand that the Council's current request is to change those regulations and we will take that under consideration. The BLM State Director also acknowledges your concerns and has asked that this issue be added as an agenda item to the Federal Subsistence Boards 2024 summer work session for further discussion with fellow Board members and Council Chairs.

This topic was discussed during the 2024 August Work Session. We asked the Interagency Staff Committee work to review the variety of cabins and fee structures among the Federal agencies that are available for subsistence users across Federal land management agencies. BLM and the ISC will work with your Council Coordinator to provide any updates as they are available.

### **13. Potential impacts to wildlife by Kinross Manh Choh Gold Mine trucking**

*The Council is concerned about increased traffic on the Alaska, Richardson, and Steese highways by trucks hauling ore from the new Manh Choh gold mine in Tetlin, Alaska to be processed at the Fort Knox mine outside of Fairbanks. Approximately 90-100 double trailered trucks will be on the roads 24 hours a day traveling in both directions. The Council is worried about the potential for an increase in wildlife collisions and a barrier to migrations of moose and caribou from the increase in traffic. We are interested to be briefed on how impacts to wildlife will be mitigated and monitored by Federal and State agencies. We also request historical data on the number of wildlife collisions in this corridor.*

#### **Response:**

Thank you for bringing these concerns to the Board's attention. The Council could request that a presentation on this topic be added to a future Council meeting agenda.

### **14. Request for updated technology at Council meetings**

*The Council feels that the technology used for Council meetings is outdated and prevents more meaningful engagement by Council members and members of the public who need to attend via distance. Video conferencing is readily used by other councils, committees, and boards, and it greatly enhances the meeting experience. Tablets at each Council member's seat could help us more easily follow along with the agenda and presentations, as well as keep better track of participants and speakers. With widely available portable satellite internet set-ups such as Starlink, there should generally be no limitations to using such technology even in rural locations. The Council requests that OSM prioritize the upgrade of the technology and equipment used for Council meetings and suggests that OSM consider hiring an IT position to assist in setup and running of the equipment at meetings.*

#### **Response:**

The Board understands that there are on-going difficulties with connectivity at the Council meetings and that video conferencing is not used at most Councils' meetings. Currently, both platforms Zoom and Microsoft Teams are available for the Office of Subsistence Management (OSM) use; however, using a video platform will require additional technical support.

OSM is currently in the process of moving from the U.S. Fish and Wildlife Service to the Department of the Interior Office of Policy, Management, and Budget. Once the move is complete, OSM will be contracting for the audio/visual services. At that point we can include the Council's requests in the statement of work for the contractor.

The Board is aware that OSM has been taking all of this into consideration as they have been receiving feedback on this topic from the Councils. While entirely dependent on budgets,

Council meeting upgrades through the purchase of StarLink units, tablets, and additional IT support have all been items discussed as improvements that could happen in the future.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts and am confident that the federally qualified subsistence users of the Eastern Interior Region are well represented through your work.

Sincerely,



Anthony Christianson  
Chair

Enclosures:    Topic 1 Enclosure A – 2022 BLM Sheep Survey  
                  Topic 1 Enclosure B – Yukon-Charley Sheep Survey  
                  Topic 1 Enclosure C – Sheep summary WRST 2023  
                  Topic 3 Encl. 1 – Memo FSB to SOI re Program Needs with Enclosures  
                  Topic 3 Encl. 2 – A24077\_FSB Letter to Secretaries re Bycatch and Salmon  
                  Management with Enclosures  
                  Topic 5 Encl. 1 – Yukon Enhancement Position Flyer  
                  Topic 5 Encl. 2 – Yukon Hatchery Chinook Position  
                  Topic 5 Encl. 3 – Ruggeron et al. 2012 Competition btw Norton Sound Chum  
                  Asian Hatchery Chum  
                  Topic 8 Encl A – Follow-Up from the FSB to NVV re AVSMA Consultation  
                  Topic 8 Encl A – Enclosure 1\_FSB Closure Policy  
                  Topic 8 Encl C – Enclosure 2\_DRAFT Red Sheep and Cane Creek Options V2  
                  Topic 10 Enclosure – USFWS-Climate-Action-Plan  
                  Topic 11 Enclosure – 50 CFR 100

cc: Eastern Interior Alaska Subsistence Regional Advisory Council  
      Federal Subsistence Board  
      Office of Subsistence Management  
      Interagency Staff Committee  
      Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
      Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of  
      Fish and Game  
      Administrative Record