

Kodiak/Aleutians Subsistence Regional Advisory Council

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In Reply Refer To:
OSM.A24120

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

Dear Chairman Christianson:

The Kodiak/Aleutians Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2024 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held on September 4– 5, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 6 – 7, 2025, meeting. The Council shares this information to raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Kodiak/Aleutians Region.

1. Need for Online Access to Federal Subsistence Harvest Permits

The Council previously shared concerns about the time and difficulty involved in obtaining Federal subsistence harvest permits in our region. We were happy to hear about plans to develop an online permit application system and stress the importance of implementing that system quickly (within two years) to improve accessibility and efficiency for our rural residents. The current system requires obtaining permits in person or by mail and poses challenges in our region, especially for our remote rural communities. We also stress the importance of ensuring that online access works effectively for remote areas with limited internet connectivity and bandwidth.

2. Lack of Fisheries Research Monitoring Plan (FRMP) Funding for Weir Projects

The Council is grateful for the previous FRMP funding supporting the McLees River and Buskin River weirs. However, the Council is deeply concerned about the loss of FRMP funding in 2024/2025, particularly for the McLees River weir. This lack of funding prevented the weir from operating and resulted in loss of essential salmon escapement data to support effective management of Unalaska salmon and subsistence opportunity for Unalaska residents. The Council emphasizes the need to improve communication about FRMP funding availability with

Councils, communities, and users. Furthermore, the Council urges the Board to advocate for greater Regional Advisory Council involvement in the FRMP application review and evaluation process. Currently, our Council's involvement occurs very late in the process and does not provide meaningful opportunity to provide input on projects during the scoring phase. Proving the Council with earlier and more meaningful involvement would help ensure the importance of community projects is effectively communicated and considered during the review process.

3. Dedicated Funding for Weirs

In addition to our recommendations for the existing FRMP the Council requests the Board create a special fund or funding pool for weir projects on a 5- or 10-year basis; perhaps this funding coming from FRMP or completely outside of FRMP if possible. While this pool might be funded by multiple sources and agencies, the Council proposes the Board take the lead on this request. Once the funding pool is set up, then the Council requests that the Board then evaluate each prospective project applied for funding through this special fund (including costs), then prioritize these projects, similar to with the FRMP process.

4. Lack of Law Enforcement Officers for Monitoring and Enforcing Subsistence, Sport, and Commercial Fishing Violations

Our Council previously reported our concerns about the lack of enforcement presence and operation in the Kodiak/Aleutian Region, including both Federal and State lands and waters. At our Council reports of subsistence and sport violations have increased, especially along the Unalaska and Kodiak Road systems. Enforcement is vital for monitoring and enforcing sport, subsistence, and commercial fishing regulations. We believe a coordinated effort among State, Federal, Local, and Tribal entities is essential for effective enforcement, and recommend dedicating a coordinator to facilitate collaboration and communication among these entities with the goal of increasing enforcement capacity and effectiveness. While enforcement is clearly outside the direct purview of the Board, because this issue is so important to continued access to subsistence, we ask that the Board take the lead on championing and coordinating this effort.

5. Challenges in Ensuring Subsistence Access to Resources Arising from Fragmented Management Approaches

Our Council once again notes that State and Federal agencies often operate in silos, with very different management structures, perspectives, and mandates. For example, the fragmented jurisdiction over salmon management between the Federal Subsistence Board, State authorities, and NOAA Fisheries creates significant challenges. This makes it difficult to manage and ensure subsistence access to resources and creates very high frustration with subsistence users who have to navigate this fractured system. A coordinated approach is crucial for effective management and subsistence access. We strongly encourage the Board to look for opportunities to bridge these divisions and improve coordination whenever possible.

6. Importance of FRMP Funding for Statewide Salmon Research Projects

The Council encourages the Board to facilitate and promote FRMP salmon research projects at a statewide level in addition to granting salmon research projects by region. Chinook salmon is struggling across the state, chum salmon are in crisis in the north, coho across the Gulf of Alaska are showing signs of trouble. The Council believes that focusing more resources on statewide salmon research would better reflect how salmon populations operate, and align with the struggles we are observing, rather than continuing to only fund projects at a fragmented regional level.

The remainder of this report is for informational purposes only and the Council does not require a response; however, the issues are significant, and the Board may benefit from this knowledge.

7. Eradication of Signal Crayfish in Buskin River System in Kodiak

The Council notes the importance of identifying funding to eradicate invasive Signal Crayfish (*Pacifastacus leniusculus*) in the Buskin River System, specifically Buskin Lake. The Council is concerned that these crayfish prey on salmon eggs and fry in the Buskin River System. The Buskin River is a crucial source of Sockeye and Coho salmon for federally qualified subsistence users in Kodiak. The Alaska Department of Fish and Game (ADF&G) has reported on studies from Europe and California indicating that Signal Crayfish invasions contribute to the decline of native fish populations through predation (ADFG.alaska.gov, Alaska Fish and Wildlife News, October 2018).

The Kodiak/Aleutians 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 Kodiak/Aleutians Region. If you have any questions regarding this report, please contact me via Lisa Hutchinson, Subsistence Council Coordinator, Office of Subsistence Management, at lisa_hutchinson@ios.doi.gov, or 1-800-478-1456 or (907) 310-4097.

Sincerely,

Rebecca Skinner
Chair

cc: Federal Subsistence Board
Kodiak/Aleutians Subsistence Regional Advisory Council
Interagency Staff Committee
Office of Subsistence Management

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record

DRAFT