

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888
Toll Free: 1-800-478-1456

In Reply Refer To:
EIRAC.B24077

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

Dear Chair Christianson:

The Eastern Interior Alaska 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 October 8–10, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 19–20, 2025, meeting. The Council wishes to share information and raise concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Eastern Interior Alaska Region.

1. On-going Yukon River Chinook and fall Chum salmon crises

Summer of 2024 was the fifth year in a row with dismal returns of Yukon River Chinook, fall Chum, and Coho salmon to the Yukon River drainage. Escapement goals and Pacific Salmon Treaty obligations were again not met even though subsistence fishing was closed. 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.

Many Councils have written to the Board extensively on salmon issues and the Board has elevated the issues to the Secretaries of Interior and Agriculture. We are thankful to hear back from Department of Interior Deputy Assistant Secretary Joan Mooney in her January 17, 2025 letter. We hear her encouragement to develop recommendations at the Council level, which we are outlining below. We await an opinion from the Solicitor on these issues. We continue to emphasize that the Departments of the Interior and Commerce and the State of Alaska must work together to rebuild salmon stocks and manage salmon on an inter-jurisdictional and ecosystem scale. With the administrative transition in Washington DC, we request that the Board pursue meaningful action on these topics with new leadership as soon as it is feasible.

Regulatory actions needed to address bycatch and interception

To address bycatch and interception of Arctic-Yukon-Kuskokwim (AYK) salmon, the Council is in full support of time and area closures in Federal and State managed marine commercial fisheries and supports the establishment of a conservation corridor for migrating salmon. The Council continues to support establishing a bycatch hard cap for Chum Salmon and lowering the limits of Chinook Salmon hard caps in Bering Sea–Aleutian Islands groundfish fisheries. We are engaged in the North Pacific Fishery Management Council’s (NPFMC) regulatory process and will continue to share these positions with them. We urge the Board to also submit comments on the upcoming NPFMC Chum Salmon Bycatch Draft Environmental Impact Statement that support measures to allow more AYK salmon to return to their natal streams and rebuild runs. In Area M commercial fisheries, 100% observer coverage should be required to reduce the unlawful disposal of incidental harvests. Genetic sampling of salmon harvests should also be required to better understand when and where AYK salmon stocks are most commonly intercepted. Efforts are underway by a coalition of AYK stakeholders to again address the interception of AYK salmon in Area M during the upcoming Alaska Peninsula/Aleutian Island Alaska Board of Fisheries (BOF) cycle. We ask that the Board submit comments to the BOF in support of these efforts. Without marine commercial fisheries sharing in the burden of conservation, salmon returns to Western Alaska rivers will not improve and subsistence needs will continue to go unmet. We need the Board to actively weigh in on matters such as this that directly impact federally qualified subsistence users.

Yukon River management recommendations

For in-river Yukon River salmon, the Council would like to make recommendations for management. We would like to see more conservative management undertaken for fall Chum Salmon which are so important to the upper river but doing so poorly. Only 16,275 fall Chum Salmon passed Eagle sonar into Canada this year, which is the lowest passage ever recorded there. Fall Chum Salmon need to be protected as soon as they can be detected in the mixed-stock of summer and fall chum entering the river. The Council supports utilization of summer Chum Salmon by people in the lower and middle river, whenever those fish have a harvestable surplus and are in edible condition. But as soon as fall Chum Salmon are detected, summer Chum Salmon fishing needs to be shut down and a strong effort made to get every fall Chum Salmon to the spawning grounds to help rebuild these vital stocks. Once we see fall chum rebuild, then fall Chum Salmon fishing opportunities should be primarily dedicated for the upper river communities who do not have access to other species of salmon. Additionally, our Council would also like to see more precise regulatory guidance about where four-inch mesh nets can be used to fish for nonsalmon during times that salmon are running. Current directions to avoid placing four-inch nets where salmon run are too vague. There are techniques and locations where people can fish with four-inch mesh without intercepting salmon. We feel that it is necessary to educate people on these techniques and create regulations that allow for continued active participation in nonsalmon fisheries without doing harm to the salmon everyone is trying to rebuild. The Council will be sending a letter to the Federal and State in-season Yukon River fisheries managers relaying these recommendations.

Delegated authority

The Council also has a question for the Board about delegation of authority to which we would like a reply. We feel delegation of authority is a positive thing because it allows for local, knowledgeable managers to respond quickly to situations happening on the ground. However, is there a process for Board intervention if the Council or a Tribe or a member of the public felt that a manager with delegated authority was not acting in the best interests of conservation? The Council would appreciate information on this matter.

2. Office of Subsistence Management (OSM) comments on Alaska BOF/BOG proposals and North Pacific Fishery Management Council actions

The Council appreciates that OSM will no longer submit comments suggesting that regulatory and management decisions occurring on lands and waters outside of the Board's jurisdiction have no impacts on federally qualified subsistence users. However, we are dissatisfied that the Board and OSM continue to refuse to comment on important regulatory matters taken up by the BOF and the NPFMC. Actions taking place outside of the Board's immediate jurisdiction, such as the bycatch and interception of salmon in marine waters and hatchery releases of salmon, have undeniable and significant impacts on the viabilities of salmon stocks and the abilities of federally qualified subsistence users to meet their needs. The Council reiterates our statement from last year's report: the Board must take a stronger advocacy role in other regulatory arenas to protect salmon and their use for subsistence. Because such matters impact federally qualified subsistence users, it should be well-within the Board's authority to comment.

Additionally, the Council would like to request that when OSM develops a position on BOF or Board of Game (BOG) proposals, that these positions be reviewed by the Council Chairs in the regions where the proposals apply before they are submitted. We request feedback if this is a feasible amendment to the current OSM comment policy.

3. Adding Native lands to maps and availability of regulation books

Due to the large areas of the Eastern Interior Region that are road accessible, trespassing is a major issue the Council wants to bring to the Board's attention. This is primarily a concern for hunting, but it also applies to fishing. Outreach and education through hunter ethics initiatives is one way the Council hopes to see trespassing reduced. However, outreach and education will not be successful without proper reference materials. The Council would like to see improvements made to the Federal hunting regulation book maps by adding Native corporation lands and allotments. Adding this information will help raise awareness of these private lands and reduce conflicts that arise from trespassing. We feel this would be a benefit in all regions, not just the Eastern Interior, and hope it would be a relatively simple fix through the addition of another map layer. The Council requests the Board to please direct OSM to update the maps in the regulation books to show Native lands and help reduce trespassing.

Residents in our region have been frustrated by the delays in publication of new regulation booklets after a Board meeting cycle has concluded. It is important that federally qualified hunters, trappers, and fishers have timely access to the most current regulations at all times. We

request that the Board direct OSM to make the publication and distribution of new regulation books more efficient. We also request that the Federal Subsistence Management Program increase the accessibility of unit and area specific regulations and related maps via the Program website as well as through an app similar to the one created by the Alaska Department of Fish and Game (ADF&G) that allows the download of select regulations, maps, and permits directly to cell phones for ease of use and reference in the field.

4. Cabin uses for subsistence activities

The Council thanks the Board for discussing this topic during their August 2024 Work Session. We are happy to hear that an interagency working group is going to review the variety of cabin types and fee structures among the Federal land management agencies. The Council views this as a first step. The end goals should be action to address the inconsistencies in how Federal land managing agencies implement cabin use policies under ANILCA and streamline the permitting process for subsistence uses.

The Council reiterates our requests to the Bureau of Land Management (BLM) on this topic from the FY2022 and FY2023 Annual Reports. BLM regulations must be changed so that cabins can be used for subsistence purposes such as trapping without incurring fees to federally qualified subsistence users or requiring documentations of incomes. The Council strongly maintains that there needs to be a distinction made between the permits, leases, and fees required for federally qualified subsistence users versus for commercial/sport users and we request BLM to take the steps necessary to amend their regulations.

5. Development of Federal subsistence use amounts

The Council asks the Board to begin the process of developing and adopting Federal subsistence use amounts. Such metrics would be the federal equivalent to the amounts necessary for subsistence, or ANS, used in the State system. ANS is an important measure that provides an indication of whether adequate subsistence opportunities are being provided and whether subsistence needs are being met. The Council understands that this process will take time, and in the interim, the Federal system could consider adopting temporary metrics which align with State ANS until they could be further refined. We would like to see the adoption of Federal subsistence use amounts prioritized specifically for Yukon and Copper River salmon species.

6. Technology at Council meetings

The Council carries over this topic from last year and continues to request that OSM purchase Starlink internet for use during Council meetings to improve connectivity, especially in rural locations, and allow for video streaming of Council meetings. The Council suggests that OSM add video conferencing to the audio-visual (AV) contract for Council meetings since OSM does not have the AV staff to dedicate to this effort.

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. Dall sheep management and population declines

Sheep populations throughout the Eastern Interior Region continue to be a major concern for the Council. The Council continues to advocate for collaboration between Federal, State, and Tribal partners to prioritize sheep surveys in our region and the rest of the state. The Council is in the process of drafting recommendations for Dall sheep management strategies in the Eastern Interior Region. We have formed a small working group for this effort and plan to meet prior to our Winter 2025 meeting. When a final draft of our recommended management strategies is completed, we will submit a copy to the Board. Our Council is also sending a letter to Eastern Interior land managers and interested stakeholders requesting the formation of an Eastern Interior Dall sheep management coalition to further discuss issues and coordinate management strategies and research.

8. Fortymile caribou

The Council remains concerned about management of the Fortymile Caribou Herd. We thank the Board and particularly BLM for engaging in discussions with ADF&G to plan for up-coming Harvest Management Coalition meetings to revise the outdated harvest management plan. Our Council received an invitation to participate, and we have provided feedback to ADF&G about what other stakeholders should be invited. The Council feels strongly that Canadian Tribes and government should be involved in this round of planning as they were in years past. We also want to ensure that the communities of Circle and Central have representatives invited even if they do not have ADF&G Advisory Committees that are currently active.

The Council sent a letter to ADF&G outlining some of our preliminary recommendations for management. This includes limiting non-resident hunters during times of low abundance and ensuring that harvests are managed in a sustainable way that takes into account the uncertainties of climate change. We plan to provide additional input as the updated Harvest Management Plan goes through review and will share our recommendations with the Board.

9. Need for hunter ethics education

The Council wanted to inform the Board we continue to pursue opportunities to advance hunter ethics education and outreach in our region. Our Hunter Ethics Working Group plans to meet prior to our winter 2025 meeting to revisit our short and long-term goals and identify potential partners with whom we can collaborate. The Council will continue to share progress with the Board and we thank the Board and its agencies for on-going support on this initiative.

10. Copper River salmon management

In addition to concerns about AYK salmon, the Council would also like to make the Board aware of issues occurring in Copper River salmon fisheries. Subsistence needs for Chinook Salmon are

not being met in the upper river. Amounts necessary for subsistence (ANS) have only been met in two years since 2006 for residents of the Gakona to Slana portion of the drainage (in 2014 and 2015).

Commercial fishing on Copper River salmon stocks occurs prior to salmon entering the river and before being counted by the Miles Lake sonar about 30 miles upriver. People in Seattle get to eat Copper River salmon before residents of the drainage. By the time Chinook Salmon are enumerated by the sonar and make it upriver, subsistence harvests on those same stocks that were already commercially fished are often restricted or closed. This goes against the subsistence use priority.

Further, Copper River Chinook Salmon with early run timing travel furthest upstream to spawn. There is often a disproportionately high rate of commercial harvest on these fish. To reduce this disproportionate harvest pressure and address this issue, Wrangell-St. Elias National Park submitted a proposal to the BOF for the Prince William Sound meeting. Our Council submitted comments supporting Proposal 51 which sought to reduce commercial fishing in the early part of the season and allow more Chinook Salmon to pass upriver. The BOF passed an amended version of the proposal that also restricts early harvest of Chinook Salmon in the in-river personal use dipnet fishery. The Council is interested to see if these actions help ensure enough Chinook Salmon are available to meet subsistence needs in the upper Copper River.

11. Food insecurity and salmon replacement

Residents of the upper Yukon River drainage continue to experience unprecedented levels of food insecurities fueled by the salmon crisis, declines in caribou, and low moose densities. Many regional residents are not meeting their subsistence needs, and this has profound implications on physical health, cultural and spiritual well-being, and the ability to pass on subsistence traditions to younger generations.

We are once again raising this topic to the Board with the hope that that the agencies that comprise the Board can seek opportunities to support projects and programs that aim to reduce the level of food insecurity in our region. With the current seven-year closure for salmon on the Yukon River, food sources are needed to replace salmon. There are not enough other locally available food sources to do so; therefore, alternatives must be sourced elsewhere.

12. Climate change

Climate change impacts remain an issue in the Eastern Interior Region. Some notable impacts include:

- warmer fall weather and later moose ruts
- rain on snow events impacting sheep and caribou survival
- warmer water temperatures affecting salmon survival
- increased number of wildfires
- melting of permafrost which releases heavy metals and contaminants into waterways and causes erosion which in turn affects salmon spawning habitat substrates

The Council continues to recommend 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 much more cautious now than ever before. We cannot keep managing as we have in the past and instead must focus our goals on long-term consistent, reliable access to resources.

13. Area M commercial salmon harvest genetic mixed-stock analysis

The Council has previously described our concerns regarding the interception of Yukon River salmon in mixed stock commercial salmon fisheries in Area M. Some genetic sampling of Chinook and Chum salmon harvested in Area M commercial fisheries has been done in the past but there is not a robust data set showing annual stock compositions of the harvests over time. This makes it impossible to track trends in the amount of Yukon River salmon being intercepted and the impacts to annual returns.

The Council will be sending a letter to ADF&G requesting that funding be prioritized for ongoing genetic sampling in the Area M commercial salmon fisheries. Due to the importance of fall Chum Salmon as a subsistence food in the upper Yukon River and their recent historically low returns, the Council is particularly keen to see improvements to data gaps surrounding fall Chum Salmon. The Council feels that finer resolution of Area M harvest and genetic data may be crucial to helping shed light on reasons that fall Chum Salmon are not returning as they should.

14. Hatchery salmon competition with wild salmon

The Council continues to be concerned about competition between wild salmon and hatchery salmon. This issue must be addressed on a statewide and international scale. Research shows that hatchery salmon compete for food with wild Pacific salmon and have notable impacts to the diet, growth, fecundity, productivity, and abundance of other salmon and other species in the marine environment.

In Alaska, the State needs to reduce the egg take and release of hatchery fish, but the BOF consistently fails to adopt proposals that seek to do so. The BOF and ADF&G continue to ignore the results of peer-reviewed research highlighting the detrimental impacts of hatcheries to wild stocks. The Council will be submitting a letter to the BOF asking them to support a reduction in hatchery egg take and releases for Pink and Chum salmon in the Gulf of Alaska.

In the Bering Sea, most hatchery releases are from international sources. Reducing international hatchery releases will require negotiations with other countries such as Canada, Russia, Japan, and Korea. The Council will be sending a letter to staff with the U.S. Department of State outlining our concerns and requesting information on U.S. engagement in this arena.

15. Moose in Unit 20F

The Council received an update from ADF&G about moose in Unit 20F during its fall 2024 meeting. Aerial moose surveys have never been completed in Unit 20F, and monitoring relies solely on harvest permits. The lack of any baseline survey data is a major data gap that the Council would like to see addressed. The Council sent a letter to ADF&G and BLM requesting that funding for aerial surveys be prioritized so this baseline data can be established.

16. Co-management and co-stewardship

The Council is pleased to see progress being made toward the co-management and co-stewardship of resources between Federal agencies and local entities. We are also happy to see greater willingness of Federal agencies to meaningfully incorporate local and traditional knowledge into management. However, the Council also acknowledges that there is still a long way to go to reach true equity in resource management and research. We continue to encourage all agencies represented on the Board to pursue all opportunities to increase the involvement of rural residents and Tribal organizations in management efforts and field research.

The Council recommends that the U.S. Fish and Wildlife Service (USFWS) pursue two specific opportunities for co-stewardship agreements in the Eastern Interior Region. We would like USFWS to initiate a co-stewardship agreement for sheep in the Arctic Village Sheep Management Area with the Arctic Village Council and Native Village of Venetie Tribal Government. We also request the initiation of a co-stewardship agreement between USFWS and the Yukon River Intertribal Fish Commission for management of salmon on the Yukon River, similar to the agreement currently in place on the Kuskokwim River.

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 Alaska Region. If you have any questions regarding this report, please contact me via Brooke McDavid, Subsistence Council Coordinator, Office of Subsistence Management, at brooke_mc david@ios.doi.gov, or 1-800-478-1456 or 907-891-9181.

Sincerely,

Robert "Charlie" Wright, Sr.
Chair

cc: Federal Subsistence Board

Eastern Interior Alaska 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