

Yukon-Kuskokwim Delta 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:
YKDRAC.B25005

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 Yukon-Kuskokwim Delta 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 August 21–23, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 4–5, 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 Yukon-Kuskokwim Delta Region.

1. Elevate Awareness and Response for the On-going Yukon River salmon crisis

The Council has written to the Board extensively in the past on this topic, and we refer to our previous Annual Reports and letters, and letters from the Joint Councils for detailed descriptions of our unchanged concerns. The Council continues to wait for a response from the Board on this subject, as well as from the Secretaries of the Interior and Agriculture for the letters that were elevated to them. The Council requests that the Board brief the new administration as soon as possible on the critical issues facing our salmon and the tremendous hardships being placed on subsistence users due to on-going fishing closures. Further, we request responses to the letters that have been previously sent.

2. Request for the Board to take the lead on coordinating interjurisdictional management of salmon

The Council sees the need for the Board to take the lead on coordinating interjurisdictional management of salmon. No agency has stepped up to initiate meaningful actions toward ecosystem-based salmon management across jurisdictions or to ensure that commercial users share equally in the burden of conservation with subsistence users. Many Councils have written

to the Board on the need for interjurisdictional management of salmon, and those letters have been elevated to the Secretaries of the Interior and Agriculture. Still, no action has occurred, and federally qualified subsistence users continue to suffer and not meet their subsistence needs. The Council requests that the Board take the lead and facilitate a meeting between Federal subsistence fisheries managers, Alaska Department of Fish and Game, and the National Marine Fisheries Service for the purpose of developing and implementing a framework for interjurisdictional management of salmon across their entire habitat.

3. Request to enter into Co-management agreement with Yukon River Intertribal Fish Commission

The Council requests that the Board take the steps necessary to initiate a co-management agreement with the Yukon River Intertribal Fish Commission for management of salmon on the Yukon River. The Council has seen great benefits from the agreement between the U.S. Fish and Wildlife Service and the Kuskokwim River Intertribal Fish Commission that is currently in place on the Kuskokwim River. It has resulted in increased trust between Tribes and Federal managers and has allowed for local and traditional ecological knowledge to be incorporated more directly into management. Although the Yukon River is a larger system with its own unique management challenges, the process used on the Kuskokwim River can serve as an initial model that can then be shaped to fit the needs of the Yukon River. It is extremely important for the Board to prioritize the capacity building of Tribes and Alaska Native organizations when it comes to resource management and to offer them a seat at the table when making decisions.

4. More balanced geographic representation on the Council

The Council would like to have a more balanced geographic representation amongst members. As of fall 2024, the membership is skewed heavily toward Kuskokwim River representation. We hope that future appointments to the Council will bring additional Yukon River representatives as well as representatives from Mekoryuk and Nelson Island communities. We request that the Board seriously consider geographic representation, which is an item in our Council Charter, when making recommendations for appointments.

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.

5. Conflicts between local moose hunters and non-local sport hunters on the lower Yukon River

The Council remains concerned about the increased number of non-local moose hunters in the lower Yukon River and the Kuskokwim River drainages. This influx of non-local sport hunters has resulted in a growing number of conflicts and competition for limited resources. The Council recognizes that moose in Unit 18 are doing well but actions need to be taken to reduce conflicts and competition, both of which make it more difficult for federally qualified subsistence users to obtain the moose meat they need for their families. The Council will be considering submitting regulatory proposals to help alleviate some of these issues but would also

like to see an increase in law enforcement presence in the area to better address trespass and wanton waste issues.

6. The need for a public member of the Board from the Yukon-Kuskokwim Delta region

The Council has been concerned about the lack of a public member from the Yukon-Kuskokwim Delta region on the Board. We are appreciative that one of the new three public members appointed to the Board is from the Yukon-Kuskokwim Delta area. As the former Chair of this Council and a long-serving member, it is our hope that he will be able to better elevate our unique regional issues and share traditional knowledge from our region during Board deliberations and discussions.

7. Alaska Native Claims Settlement Act (ANCSA) D-1 land withdrawals

The Council was very pleased to hear that ANCSA D-1 protections were kept in place by the Biden Administration after review of the Final Environmental Impact Statement (EIS) and that a Record of Decision was published. However, the Council has chosen to continue to voice our concern on this issue because the new Administration could seek to change this decision. Revocation of ANCSA 17(d)(1) withdrawals in part or in total would result in a loss of Federal lands, on which rural residents have the benefits of subsistence priority, and it would open those lands up to potential development that would have further negative impacts to the environment and wild food resources upon which subsistence users depend. The Council will continue to monitor this issue so that we can provide comments in support of continued protections for subsistence should the need arise again in the future.

8. Donlin Gold Supplemental (SEIS) and mining impacts to subsistence and the environment

The Council remains extremely concerned about the potential impacts the Donlin Gold mine will have to subsistence in the Kuskokwim region. As we shared in last year's Annual Report, the Donlin Gold EIS is outdated and there were no meaningful Tribal consultations completed during the National Environmental Policy Act process for the EIS. The Donlin Gold EIS does not sufficiently consider climate change impacts, nor the severe declines to Western Alaska salmon and Mulchatna caribou that have occurred since it was released. It also does not accurately represent the significant negative impacts that the project will have to subsistence and traditional cultural practices. Additionally, the natural gas pipeline Right of Way (ROW) was granted without considering the cumulative impacts that the mine will have to our region; the impacts of the pipeline and mine must be considered together because they go hand-in-hand.

The Council strongly advocates for a SEIS to be initiated to address the inadequacies found in the 2018 Final EIS and Record of Decision. We wrote to the Bureau of Land Management with a request to initiate a SEIS but were told the Army Corps of Engineers was the primary agency in charge. Due to on-going litigation over the Donlin Gold mine, the Army Corps of Engineers has not yet provided any information about the potential for a SEIS. The Council will continue to monitor this issue for additional information when it becomes available.

9. Crane habitat near Marshall from the Calista gravel quarry

The Council is once again raising our concerns about a Calista rock quarry near the community of Marshall and the impacts it is having on cranes that have traditionally nested in the area. Prior to the quarry being established, thousands of cranes would land there on their yearly migration path. Since the quarry has been established, one of our Council members has observed an approximate 75% decline in the number of cranes coming to the area and is concerned about what this might mean for the species.

10. Mulchatna caribou population and support for Alaska Department of Fish and Game predator control efforts

The Mulchatna Caribou Herd population remains a major concern for the Council. The population continues to fall below management objectives and hunting is closed. The Council was pleased to see that the Alaska Board of Game passed a three-year hunting moratorium on the herd in Unit 18. Although we advocated for a longer moratorium, the closure could potentially be extended during the next Western Alaska Board of Game cycle if there is still no harvestable surplus at that time.

At our fall 2024 meeting, the Council voted to send a letter to Alaska Board of Game in support of their predator control efforts and the continuation of intensive management at least through 2026.

11. Disappearing fish camps and the cultural impacts of closed or reduced fishing

The Council would like the Board to be aware of the cultural impacts that salmon declines continue to have to the people of the Yukon-Kuskokwim Delta region. The loss of salmon is much more than a loss of food to our people; it is a loss to our identities. The abandoned fish camps that dot the rivers remind us of times in the past when we could freely practice our traditions, just as our ancestors did for generations before us. Fish camp was a place where we could also pass on traditions to future generations, giving us hope that our subsistence lifeways would continue on as they always had. Seeing empty fish camps is beyond depressing; it feels like a death.

12. Meaningful Tribal involvement in decision making and capacity building of Tribal organizations in management and science

The Council encourages the Board to strive for more meaningful Tribal involvement in management and regulatory decision-making. Although progress has been made and opportunities for Tribal consultation are provided, this is not the same as having an equal seat at the decision-making table. The Council hopes to continue to see the Federal Subsistence Management Program build the capacity of Tribal organizations in resource management and science through such initiatives as the Fisheries Resource Monitoring Program and the Partner's for Fisheries Monitoring Program. Ideally, more funding could be made available and these programs could be expanded to include wildlife so that more Tribes have opportunities to

participate and Tribes can build capacities for other aspects of resource management besides just fisheries.

13. North Pacific Fishery Management Council (NPFMC) Chum Salmon Bycatch Preliminary Draft EIS

The Council wants to make the Board aware that we will be sending a letter to the NPFMC providing comments about the importance of Chum Salmon to the people of our region and encouraging them to implement a hard cap on Chum Salmon bycatch in the pollock fishery. The NPFMC will be having a special meeting in February to review a preliminary draft EIS for Chum Salmon Bycatch Management. Following the meeting it is anticipated that a draft EIS will be published and available for public comment. The Council will continue to monitor and engage in the NPFMC regulatory process and encourages the Board to do the same.

14. Need to reduce total allowable catch for pollock in commercial fisheries

In addition to having a hard cap for both Chinook and Chum salmon bycatch, the Council wants to see the NPFMC reduce the total allowable catch for pollock. We believe that by taking both these actions that there would be a greater chance of a positive impact to Arctic-Yukon-Kuskokwim (AYK) salmon stocks and the number of fish returning to our rivers.

15. Reductions in halibut sizes and need to reduce bycatch of Pacific Halibut

Halibut bycatch rates in marine commercial fisheries are astronomical and have resulted in declines in halibut numbers and their sizes over time. Halibut are an important subsistence resource to coastal communities, but they are becoming more difficult to harvest.

The Council will be sending a second letter to the NPFMC requesting a reduction in the total allowable catch for pollock as well as a reduction to halibut bycatch.

16. Link between Coho Salmon harvested in Area M and low returns to AYK and need for genetic sampling and stock assessment of Coho Salmon harvest and 100 percent observer coverage in Area M commercial fisheries

The Council has raised concerns in the past about the interception of AYK Chum Salmon in the Area M commercial salmon fisheries. Genetic research has shown that AYK Chum Salmon are indeed caught in the Area M fisheries. Now, the Council would like to raise our concerns about the interception of Coho Salmon as well. Coho Salmon are not as well studied as Chinook or Chum salmon. To the Council's knowledge, mixed stock genetic analysis of the Coho Salmon harvested in Area M commercial fisheries has not been completed. However, it has been observed by fishermen that large and early harvests of Coho Salmon in Area M correlate with low returns of the same species in the Kuskokwim and Yukon river drainages. The Council wants to see a stock assessment done of the Area M commercial Coho Salmon harvests. We also want to see 100 percent observer coverage on commercial fishing boats in Area M to ensure unwanted catches are not being thrown overboard.

17. Impacts of hatchery salmon releases on wild stocks

During the All-Council Meeting, researchers provided information on the negative impacts that hatchery salmon are having on wild salmon stocks. The number of hatchery salmon being released by the State of Alaska and other countries, such as Russia and Japan, must be reduced because hatchery salmon compete for resources in the ocean with wild Alaska salmon. Our wild salmon are already struggling due to changing ocean conditions and all possible actions need to be taken to rebuild our stocks.

18. Wrongful use of the term “anecdotal” to describe traditional ecological knowledge

The Council is angered by the continued use of the word “anecdotal” to describe traditional ecological knowledge held by elders and other subsistence users in some management and regulatory spaces. Traditional knowledge and Indigenous Science must be held in the same esteem as Western Science. The Council recommends the Board and Federal Subsistence Management Program discourage the use of the term “anecdotal” to describe ways of knowing that fall outside of Western Science.

19. Need to monitor caribou near and north of the Yukon River to understand if they are distinct residents or stragglers from other herds

The Council wants to make the Board aware of the need to monitor caribou near and north of the Yukon River in Unit 18 and southern Unit 22. It is unclear whether the occasional caribou that are spotted in this area are part of a larger herd such as the Western Arctic, or if they are distinct resident caribou. Due to declines, the Western Arctic Caribou Herd has not migrated into the southern extremes of its historical range in many years. The Council would like to see more radio-collaring and genetic testing done so we can learn more about these animals.

The Yukon-Kuskokwim Delta 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 Yukon-Kuskokwim Delta Region. If you have any questions regarding this report, please contact me via Brooke McDavid, Subsistence Council Coordinator, at brooke_mcdavid@ios.doi.gov or 907-891-9181.

Sincerely,

[CHAIR NAME]
Chair

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta 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

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