

Southeast Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To:

OSM.B25004

MARCH 27 2025

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 Southeast 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 22–24, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 18–20, 2025 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Southeast Alaska Region.

1. Conflicts in scheduling Federal Subsistence Board meetings with other meetings

The Council was made aware of significant conflicts in the scheduling of several important upcoming meetings of organizations that make decisions affecting subsistence users. Specifically, the February 4–8, 2025, Board meeting was scheduled during the same time as the Alaska Board of Fisheries (BOF) meeting (January 28–February 9) and North Pacific Fishery Management Council (NPFMC) meeting (February 3–11).

At its October 2024 meeting, a public testifier noted that the dates for the Board meeting were set **after** the BOF and NPFMC meetings were scheduled. The testifier opined that this was perhaps deliberate and that this will prevent some subsistence users from attending all of these meetings to give public testimonies. The testifier stated that this also unnecessarily complicates planning for the communities and organizations, as they will have to make decisions as to which individuals should attend which of these meetings happening simultaneously. For instance, members of the Ketchikan Indian Community (KIC) will have to choose whether to attend the Board meeting, where their proposal to rescind the nonrural designation for Ketchikan will be acted upon or the equally important Southeast and Yakutat Finfish and Shellfish BOF meeting. The BOF meetings are on a three-year meeting cycle, so if members of the public are not able to

comment at this meeting, they will have to wait three more years for the next opportunity. Both the Board and the BOF meetings are extremely important to subsistence users, as both entities make substantial regulatory decisions that govern the take of fish and wildlife resources, which impact this user group.

One of the most important tools subsistence users possess to protect their subsistence way of life are their voices. Federal and State regulatory processes include important opportunities for public participation. Encouraging the public to engage is not enough; the Board must ensure that efforts are made to safeguard the public comment opportunity for those who wish to participate. If the meeting schedules of the most important decision-making bodies are not considered when choosing the Board meeting dates, then the Federal Subsistence Management Program (Program) is not operating in the spirit of public involvement, the cornerstone of the Program.

Request to the Board:

The Council asks the Board to require staff to research major meeting schedules before offering possible dates of Board meetings to its members for choice. The meeting schedules should include the Alaska Board of Fisheries, Alaska Board of Game, and Joint Board of Fisheries and Game meetings, NPFMC meetings, Alaska Federation of Natives meetings, and those of any other significant decision-making meetings that are of interest to subsistence users.

2. Definition and Guidelines for 'rural' community

The Council recently completed a multi-year process of deliberation and delivering a recommendation on a proposal to rescind nonrural designation status of Ketchikan. This was a long and complicated process that required significant engagement by the Council.

The Council struggled with making a recommendation on the proposal, in part because: 1) the Office of Subsistence Management (OSM) preliminary conclusion only offered a neutral position; 2) the Council felt Title VIII of ANILCA does not adequately define the term 'rural;' and 3) the history of how nonrural determinations were made in the past was confusing. Many Council members expressed their discomforts and difficulties with their decisions to support or oppose this proposal and some mentioned that it felt like this process was pitting Tribe against Tribe.

The policy and implementation of the nonrural determination process has changed over the years. The burden has been placed on the Councils to essentially define 'rural' as it sees it, taking into consideration a number of factors that residents are supposed to be familiar with. During its fall 2023 meeting, the Council offered suggestions to OSM staff regarding important factors to consider as 'rural characteristics' and items that the Council would like to see emphasized in the factfinding effort for the analysis.

At the fall 2024 meeting, a substantial analysis was provided, and the Council heard a record amount of testimony on the nonrural determination proposal. The Council asked questions about the definition of 'rural' during its deliberations. In seeking more guidance, they even questioned

whether the proposed area was considered rural by the Department of Housing and Urban Development. Without an authoritative definition for ‘rural,’ it was challenging for the Council to complete this task.

The Council also considered the reasons for KIC’s nonrural determination proposal. They reflected on the many comments from KIC members that supported the proposal claims, namely, that traditional wild foods of the area are critical to their health and survival. The Council would like to help the KIC tribal community steward its resources so that they can continue to hunt or fish in their area and have access to their resources. Under the current processes and regulations, the Council was unsure how best to do that.

During deliberations, the Council discussed what other means might be available to meet KIC’s concerns to achieve adequate protection and provision for the physical, economic, traditional, and cultural existence as enshrined in ANILCA. One Council member pointed to a portion of the congressional history of ANILCA and wondered if a solution may be available through analyzing original intent.

Title VIII was originally added to ANILCA to protect the rights of Alaska Native peoples to continue their customary and traditional way of life. The final law provided a subsistence priority for rural residents, Native and non-Native alike.

801. The Congress finds and declares that—(1) the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Native and non-Native, on the public lands and by Alaska Native on Native lands is essential to Native physical, economic, traditional, and cultural existence and to non-Native physical, economic, traditional, and social existence.

If Title VIII was created with the purpose to essentially make amends for what the Indigenous populations of Alaska gave up and the shortcomings in the Alaska Native Claims Settlement Act (ANCSA), then a review may be helpful at this time, especially as it pertains to how Indigenous rights are protected. Was Title VIII originally added to the land conservation bill that came into existence to protect the rights of Alaska Natives to continue their customary and traditional way of life?

Perhaps this can be explored to see if a subsistence priority can be provided to Tribal citizens outside of making an entire area ‘rural’ for that purpose. Would the Secretary of the Interior be able to take action to protect the subsistence needs of Alaska Natives, acknowledging language in ANCSA and ANILCA’s congressional history? Specifically, from the 1971 House Conference Report, Joint Statement of the Committee of Conference, which states in part:

The Senate amendment to the House bill provided for the protection of the Native peoples’ interest in and use of subsistence resources on the public lands. The conference committee, after careful consideration, believes that all Native interests in subsistence resource lands can and will be protected by the Secretary through the exercise of his existing withdrawal authority. The Secretary could, for example, withdraw appropriate lands and classify them in a manner which would protect

Native subsistence needs and requirements by closing appropriate lands to entry by non-residents when the subsistence resources of these lands are in short supply or otherwise threatened. The Conference Committee expects both the Secretary and the State to take any action necessary to protect the subsistence needs of the Natives.¹

Further, Congress considered the subsistence priority for Alaska Native peoples prior to the 1994 addition of Alaska's Tribes to the Federally Recognized Tribal List Act (added by BIA in 1993, affirmed by Congress in 1994), and therefore the political designation for Tribal citizens did not yet exist for Indigenous peoples in Alaska. It does now exist, and the political distinction is a legally critical and necessary distinction in the law.

The Council realizes this guarantee of Indigenous access to traditional areas could change the way subsistence is practiced throughout the State; however, it sees that this process would be a continuation of the evolution of the law and implementation of Title VIII. ANILCA is remedial legislation and as such it should be given a broad sweep and liberal interpretation in favor of continuing the subsistence priority. This may be an adequate resolution to meet the motivation behind KIC's proposal to rescind the nonrural determination of Ketchikan.

Request to the Board:

- 1) The Council requests that the Board clarify the distinction between 'rural' and 'nonrural' as it pertains to nonrural determination proposal requests. A better definition of 'rural community' to aid Councils in determining rural characteristics is needed in the Program's Nonrural Determination Policy. The Council understands that all communities are rural unless designated nonrural, but additional, more definitive direction is necessary for Councils to sufficiently consider 'rural characteristics.' The Council would appreciate the Board's focused attention on this request for a definition and specific guidelines for the evaluation of communities when future requests to rescind nonrural determinations are submitted and processed.
- 2) The Council requests that the Board advocate for a process to be undertaken to define 'rural' in Title VIII and take whatever appropriate actions are necessary to officially make this change.
- 3) Additionally, the Council requests the Board to consider whether a rule change request would be necessary to meet the intent of ANILCA and protect the subsistence needs of Alaska Natives. It should also contemplate the intent reflected in the Congressional Record in its exploration of remedies. In particular, the Council would like to see: (1) the Secretary of Interior review the original purpose and intent of Title VIII; and (2) explore actions that could provide Tribal citizens access to their traditional subsistence resource lands without changing the nonrural designation status of that area.

¹ H.R. Conf. Rep. 92-746 (1971) House Conference Report, Joint Statement of the Committee of Conference, see C(2) on page 4

3. Unit 4 Deer Monitoring

During the last regulatory cycle, the Board approved three wildlife proposals that closed three areas in Unit 4 for ten days to the harvest of deer by non-federally qualified users. These proposals were submitted to provide a meaningful priority to federally qualified subsistence users and to ensure the continuation of subsistence uses of deer.

During the vote on WP24-04 (Angoon), the Bureau of Land Management (BLM) Acting Board member noted that this closure would be subject to the Board's closure policy, which states that when a closure is no longer needed, the Board will reopen the affected Federal public lands and waters as soon as practical (FSB 4/4/2024, p. 241).

During the vote on WP24-05 (Hoonah), the Bureau of Indian Affairs Board member requested that the effects of the closure be monitored following its implementation to evaluate the benefits it will have on the affected Federally qualified subsistence users (FSB 4/4/2024, p. 269) and the BLM Acting Board member reiterated his general comments from WP24-04.

During the vote on WP24-06 (Pelican), the Forest Service Board member recognized from the votes on the two previous proposals that there was a desire, once regulations were put in place, to monitor metrics to understand how to move forward on this issue (FSB 4/4/2024, p. 295). The BLM Acting Board member reiterated that the closure review process will serve as a means to evaluate the effectiveness of this closure and whether or not those closures continue to be needed (FSB 4/4/2024, p. 296).

Request to the Board:

The Council would like to know if any surveys or other monitoring will be done in addition to the closure reviews to assess the effectiveness of these closures and determine the benefits to local Unit 4 subsistence users. The Council requests the Board to explore ways to adequately fund any monitoring efforts.

4. Use of Data for Southeast Alaska Fish and Wildlife Status Reports:

The Council routinely shares the regional reports it receives on the status of fish and wildlife populations in its Annual Report so that the Board can understand current populations and harvests in Southeast Alaska. You will find the latest reports attached.

The Council believes it would be beneficial to incorporate additional information for the status reports it receives, including proportions of harvest by federally qualified subsistence users versus harvest by non-federally qualified users. Additionally, it would be helpful if this information was broken down by geographic area where possible. This would assist the Council in identifying important trends so that they can make regulatory decisions based on federal or state data specific to user groups.

Request to Board:

The Council understands that these reports can only include the information that the creator receives, and that the data received may not be categorized as referenced above. The Council asks the Board to encourage the State of Alaska to respond to requests for information submitted by Federal staff in a timely and complete manner and to entertain requests for data under specific parameters (such as by user group and geographic area), if such data is available in that way. The Council would appreciate this extra effort as it is important to have as much information as possible for the Council to make comprehensive recommendations to the Board.

5. Funding for Unit 4 Deer Surveys:

Currently, the Hoonah Indian Association is doing subsistence surveys in Unit 4 communities. This was originally funded by the Forest Service under the Southeast Alaska Sustainability Strategy. The group has reported data and information back to the Council and the Council found the information useful, especially when acting on the Unit 4 Deer proposals mentioned above.

Request to Board:

If this project does not receive future funding, the Council would like to see the Board support efforts to secure funding. This could be either through a Wildlife Resource Monitoring Project or through other means. It is important to ensure the data can continue to be collected and shared with the Council for consideration should there be issues with Unit 4 deer in the future.

6. Need for Moose Survey in Yakutat:

The Council member from Yakutat informed the Council that it has been approximately six years since a survey for moose in the Yakutat area was conducted. Due to the limited aircraft pilot resources in the area, it has not been possible to get an accurate count of moose in the area.

Request to Board:

If a Wildlife Resource Monitoring Program is established, the Council would like for the Board to support a Yakutat moose survey as one of the projects. If there are solutions to address the limited air carrier/pilot issue, other than funding an airplane or helicopter at great expense from another part of Alaska, the Council would appreciate knowing of such options.

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. Tongass National Forest Plan Revision:

The Council will continue to monitor the Tongass National Forest Plan (Plan) Revision process, including the assessment phase, and prioritize its participation in public engagement and comment opportunities as appropriate. This Plan, being revised to protect resources, support sustainable economies, maintain healthy ecosystems, and meet community needs, is important to Southeast Alaska federally qualified subsistence users, as it will direct how these users may utilize the local Federal public lands.

At its fall 2024 meeting, the Council was informed that the Plan Revision was in the assessment phase and that assessments were expected to be released in January 2025, and a public comment period on these assessments will open. Since there were no documents for review/comment at the time of the fall meeting, the Council formed a workgroup to capture some initial thoughts in anticipation of the assessments document release. The Council was advised that it could submit comments on the assessments outside of the formal comment period because it is a FACA committee, and the Forest Service will honor the comments and sentiments of this Council moving forward. The Council anticipates that the Plan Revision will be a rolling topic on its Annual Reports until the process is complete.

The Southeast 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 Southeast Alaska Region. If you have any questions regarding this report, please contact me via DeAnna Perry, Subsistence Council Coordinator, Office of Subsistence Management, at deanna.perry@usda.gov, or 907-209-7817, or 1-800-478-1456.

Sincerely,



Don Hernandez
Chair

Enclosure: Southeast Alaska Fish and Wildlife Status Reports (Mar. 2025)

cc: Federal Subsistence Board
Southeast 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

Fisheries Update – Winter 2025





2024 The Year of the Sockeye

- Record escapements in systems throughout Southeast
- Increased harvests

2024 Eulachon monitoring

- Qualitative relative abundance surveys during spawning season
- Observers onsite to document abundance, distribution, and harvest
- Aerial, walking, and boat surveys
- Collaboration with local landowners, KIC, and Ocean and Earth Environmental Services (eDNA)
- Crew onsite March 15-26
- Abundance assessed as “**Abundant**”
- **Abundant** = large high-density schools (>10,000 fish) widespread along multiple major channels and present beyond one week



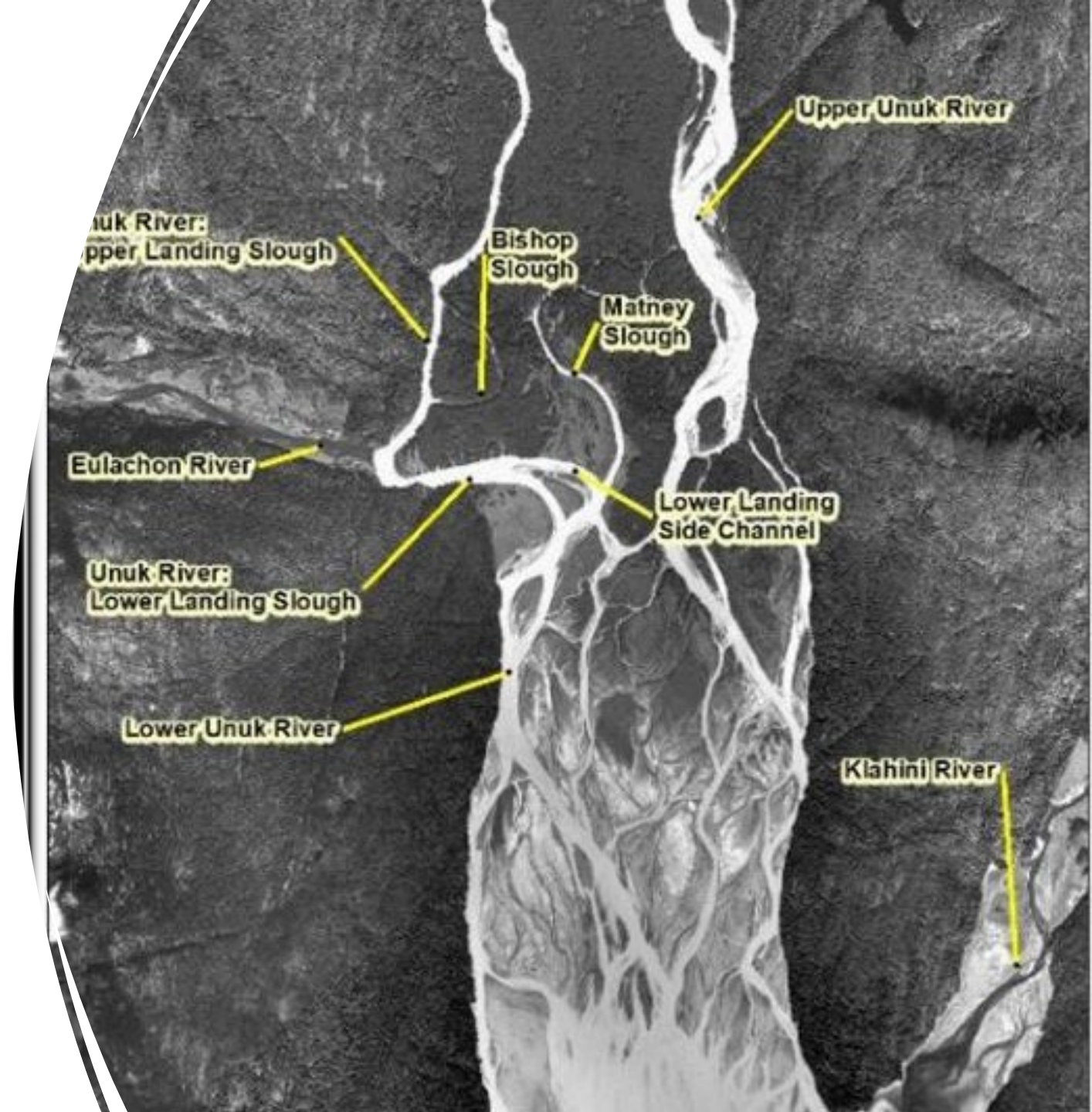


2024 Eulachon fishery

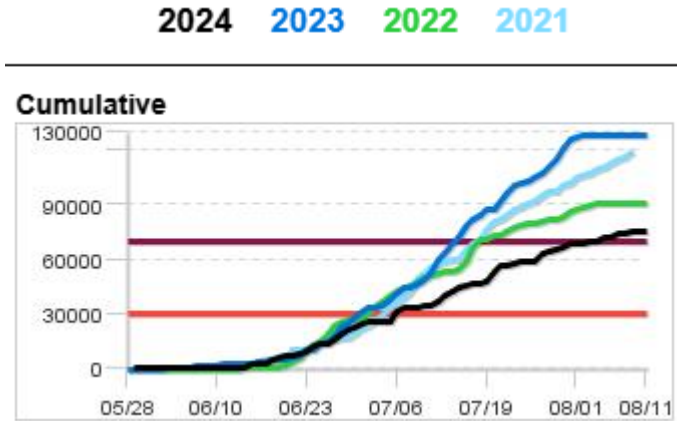
- Closed to NFQU
- District 1 closed, only Unuk open
- Limit of one 5-gallon bucket
- Dip net and cast net only
- 9 permits with reported harvest

2025 Unuk Eulachon monitoring

- Field operations limited due to budget and travel restrictions
- Aerial surveys and day trips rather than extended onsite presence



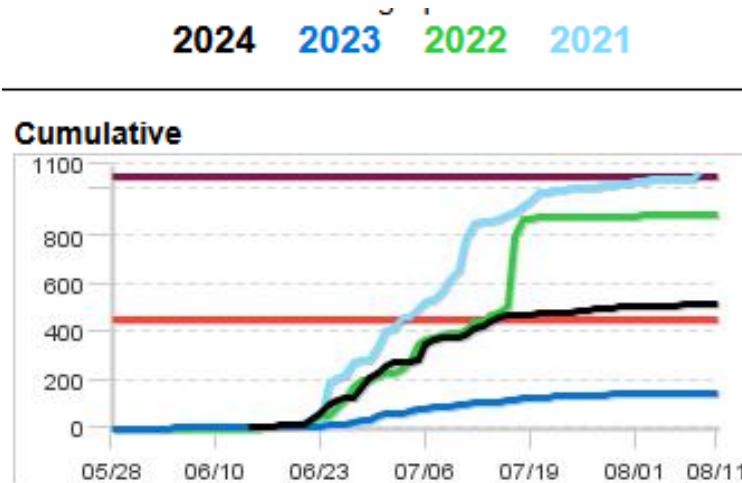
Yakutat – Situk River



Sockeye

Weir count 75,778 fish

Above escapement goal range of 30K-70K



Chinook

Weir count 517 large fish

Just made lower end of escapement goal
Fisheries closed at beginning of season

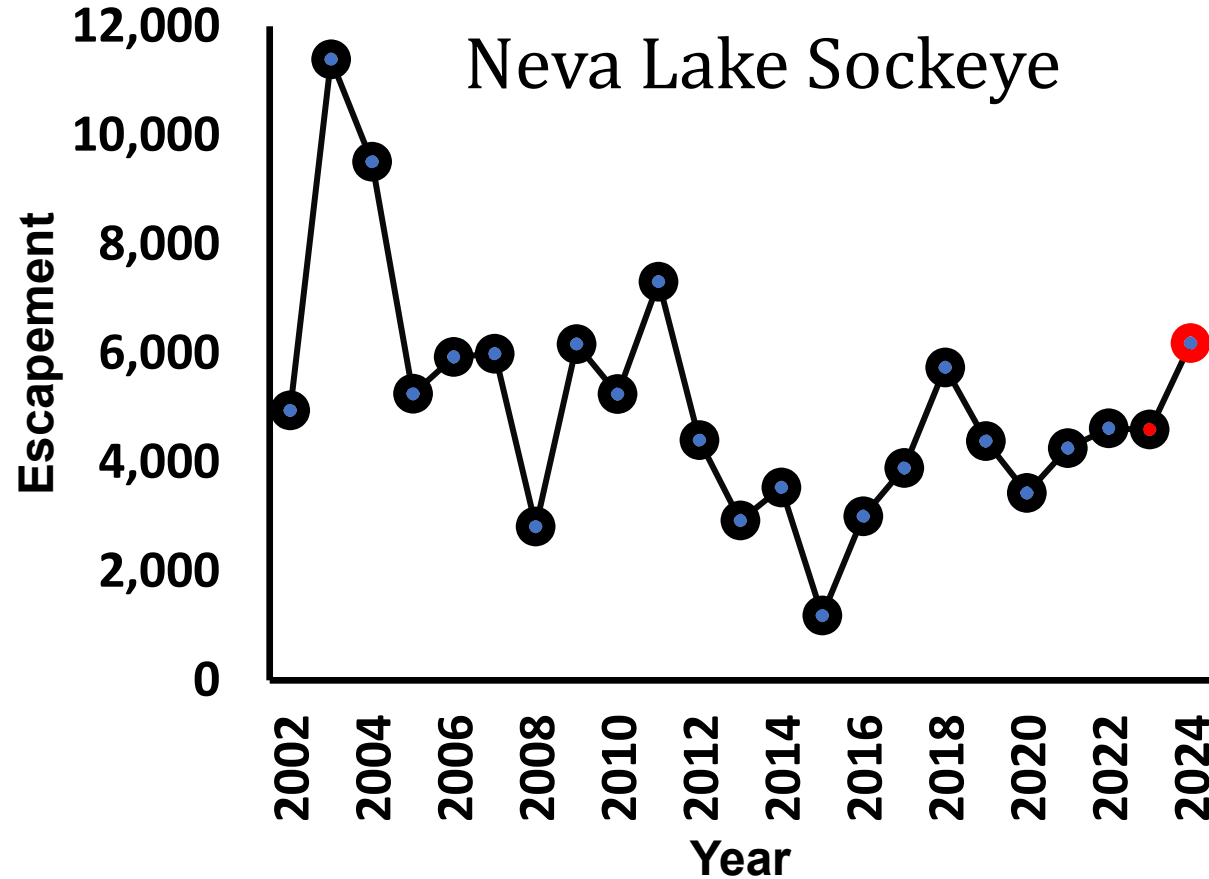
Taku River

- Closure rescinded by FSB
- Proposed regulation package deferred by FSB pending clearance under Pacific Salmon Treaty
- Existing personal use fishery
- 96% Juneau residents
- Harvest of 1,341 Sockeye on 92 permits in 2024.
- Will likely have a Federal fishery mirroring state PU fishery under special action in 2025.



Hoonah Area Systems

- Weir count of 6,184 sockeye
- Best escapement since 2011
- Harvest limit increased from 10 to 20 in 2023
- Reported harvest of 230 on 22 permits in 2023, 5-year average of 63 before that

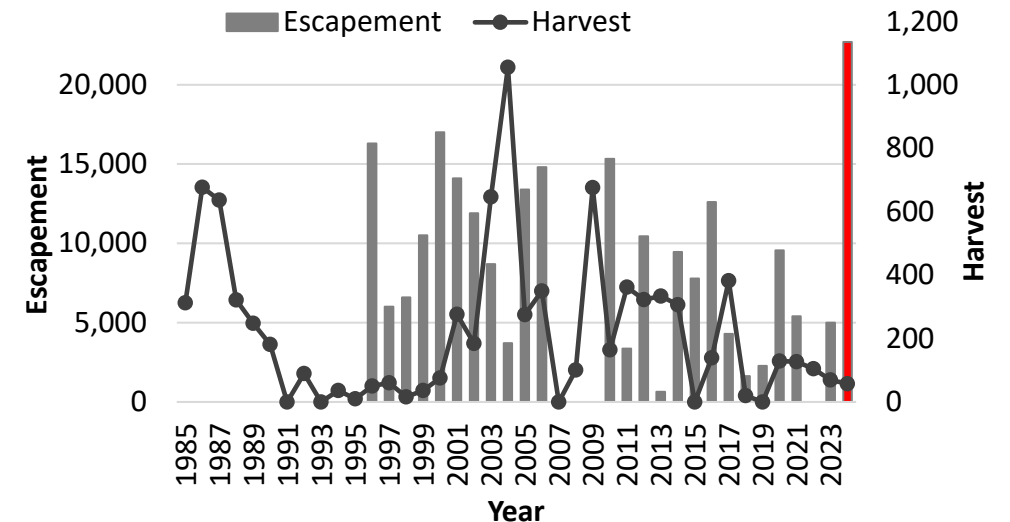


Angoon

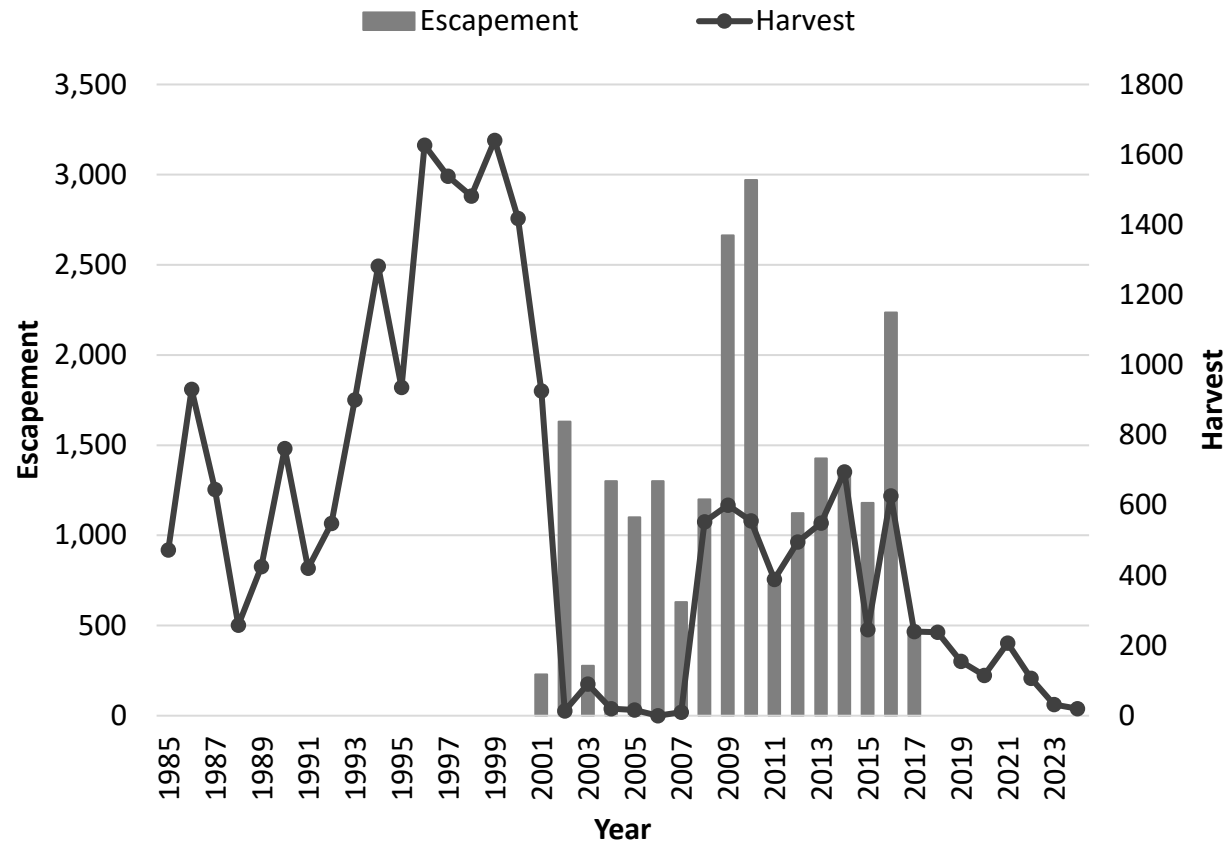


Sitkoh Lake

- Escapement of almost 23,000 Sockeye in 2024 – best since monitoring began in 1997.
- Starlink-based remote monitoring system worked well after technical challenges in 2023



Angoon



Kanalku

- FRMP-funded project ended in 2017, no escapement info since then
- Using reported harvest and local knowledge to monitor
- Reported harvest declined to 32 Sockeye in 2023, 20 in 2024.

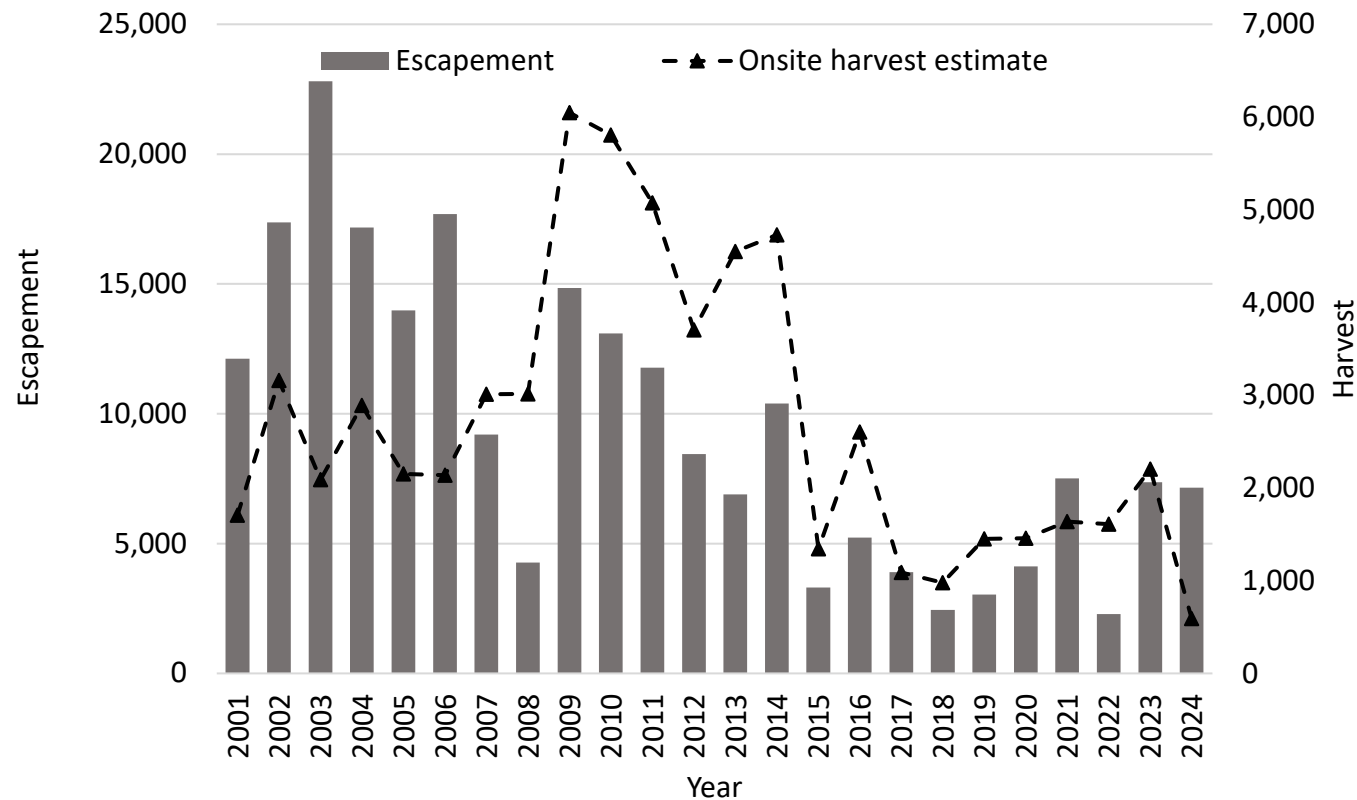
Angoon



- Subsistence fishing at Basket Bay with Angoon Youth Stewards
- Crew members obtained proxy permits for elders
- Distributed fish to elders
- Third year at Basket Bay, will expand to Sitkoh Bay and collect scale samples from harvested fish in 2025.

Sitka Area Systems

Klag Bay Sockeye



- FRMP project operated by Sitka Tribe of Alaska
- Was closed inseason in 2023
- Improved escapements for past two years, decreased harvest and effort in 2024.
- Closure in 2023 may have discouraged effort in 2024.

Sitka Area Systems

Redoubt Lake Sockeye

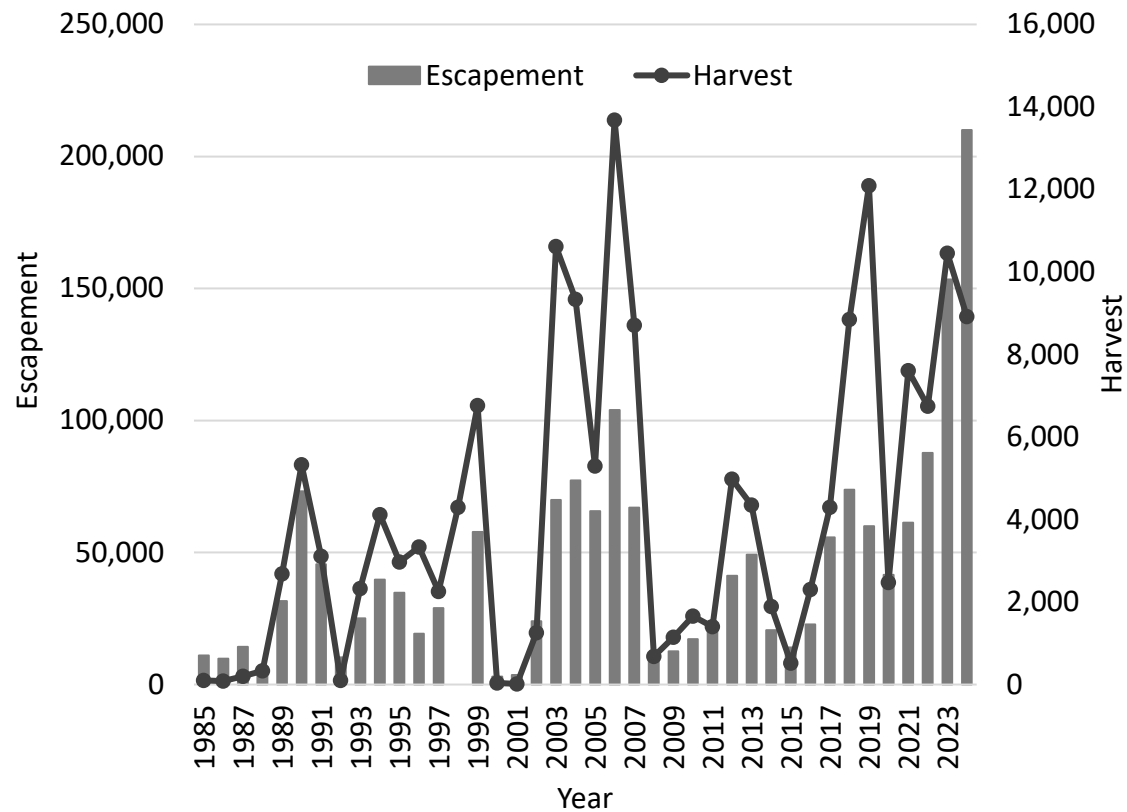


Photo: KCAW

- Record weir count escapement of 210,000
- Above escapement goal range of 7,000 – 25,000 fish as well as highest tier (40,000) of management plan
- BOF approved use of net gear within Redoubt Bay, 100+ yards from the outlet falls.

Petersburg/Wrangell Area

- 123 permits issued/91 fished
- Wrangell 2/3, Petersburg 1/3
- 1,991 sockeye harvested (2nd highest on record)
- Chinook season closed for 8th year in a row (May 15 - June 20)

Stikine River

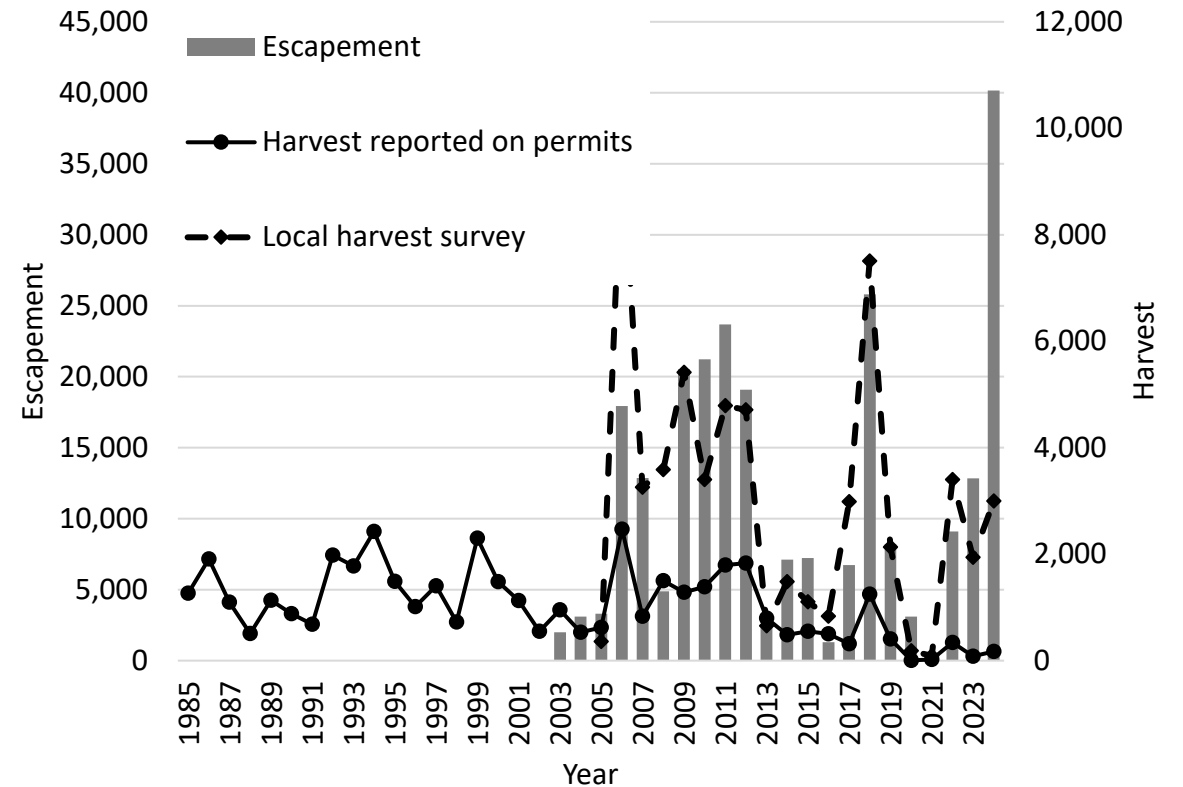


Ketchikan/Prince of Wales Systems



- FRMP project operated by Hydaburg Cooperative Association
- Escapement of 40,150 sockeye, best since monitoring began in 2003.
- Estimated harvest of 3,028 sockeye based on local surveys
- Dramatic upswing from low of 558 escapement in 2021

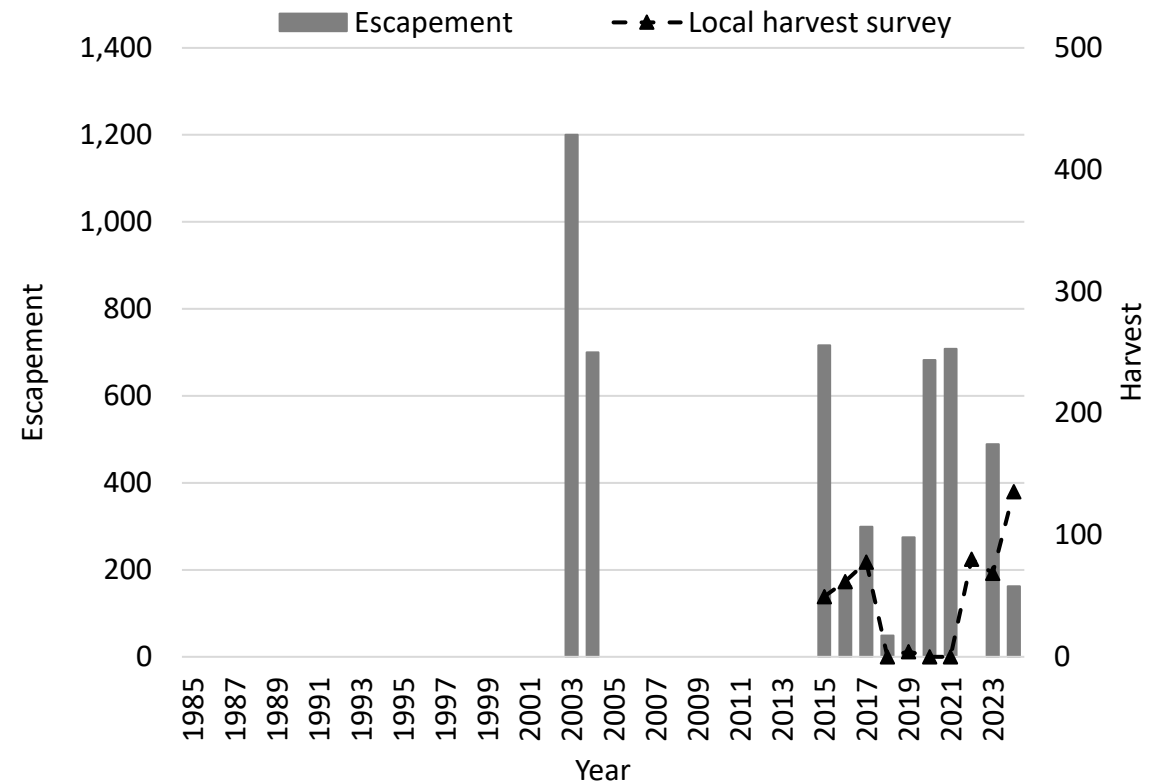
Hetta Lake Sockeye



Ketchikan/Prince of Wales Systems

Eek Lake Sockeye

- FRMP project operated by Hydaburg Cooperative Association
- Escapement of 162 sockeye
- Harvest of 380 sockeye



2025 Season Outlook



- Reduced sockeye returns due to poor ocean entry conditions in 2023.
 - May be mitigated by low seine effort due to pink salmon abundance and market conditions.
- Record low snowpack may lead to low stream flows and high water temperatures.
- Early closures due to poor Chinook returns on Stikine, Situk, etc.

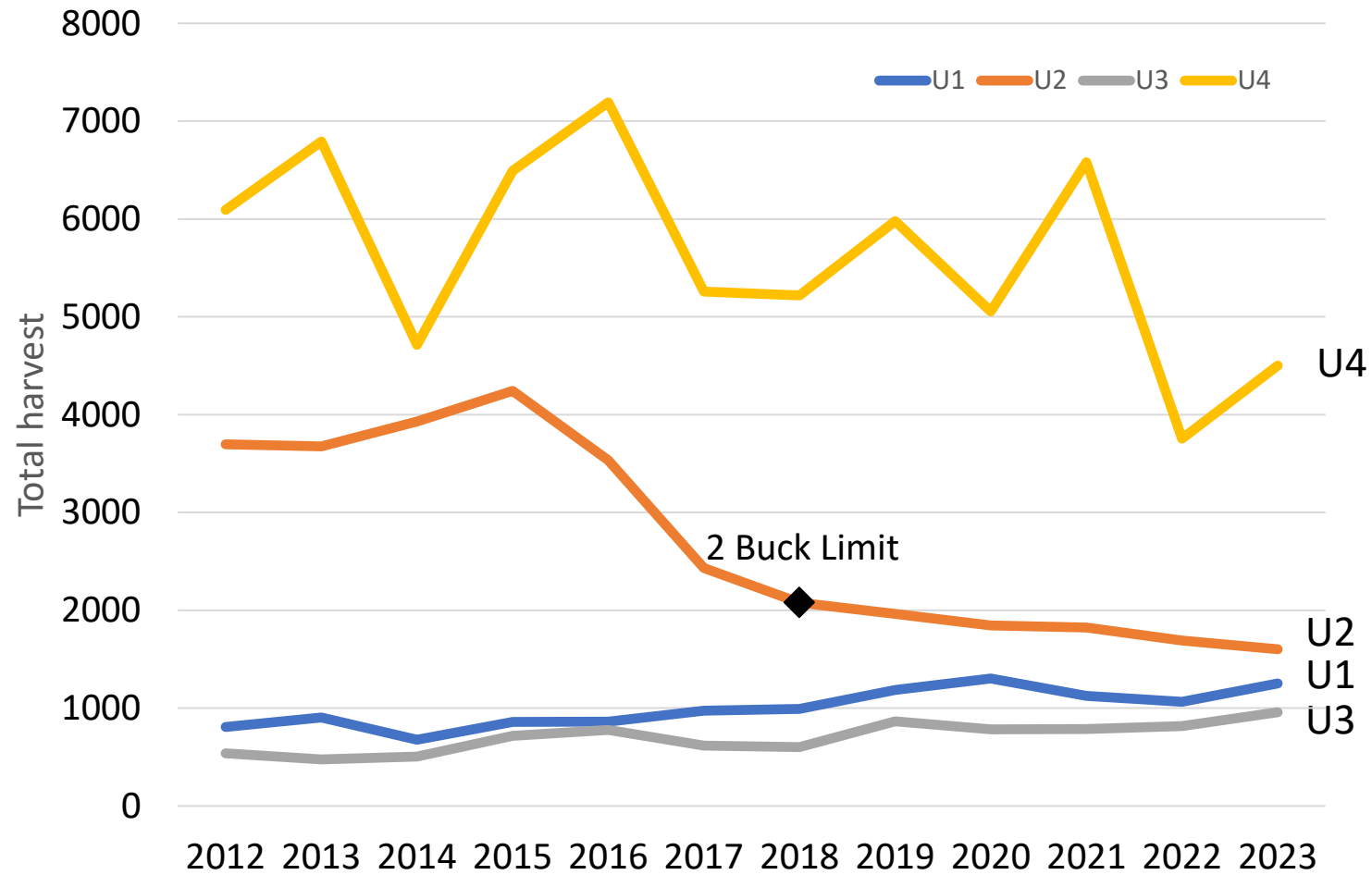
Questions or comments





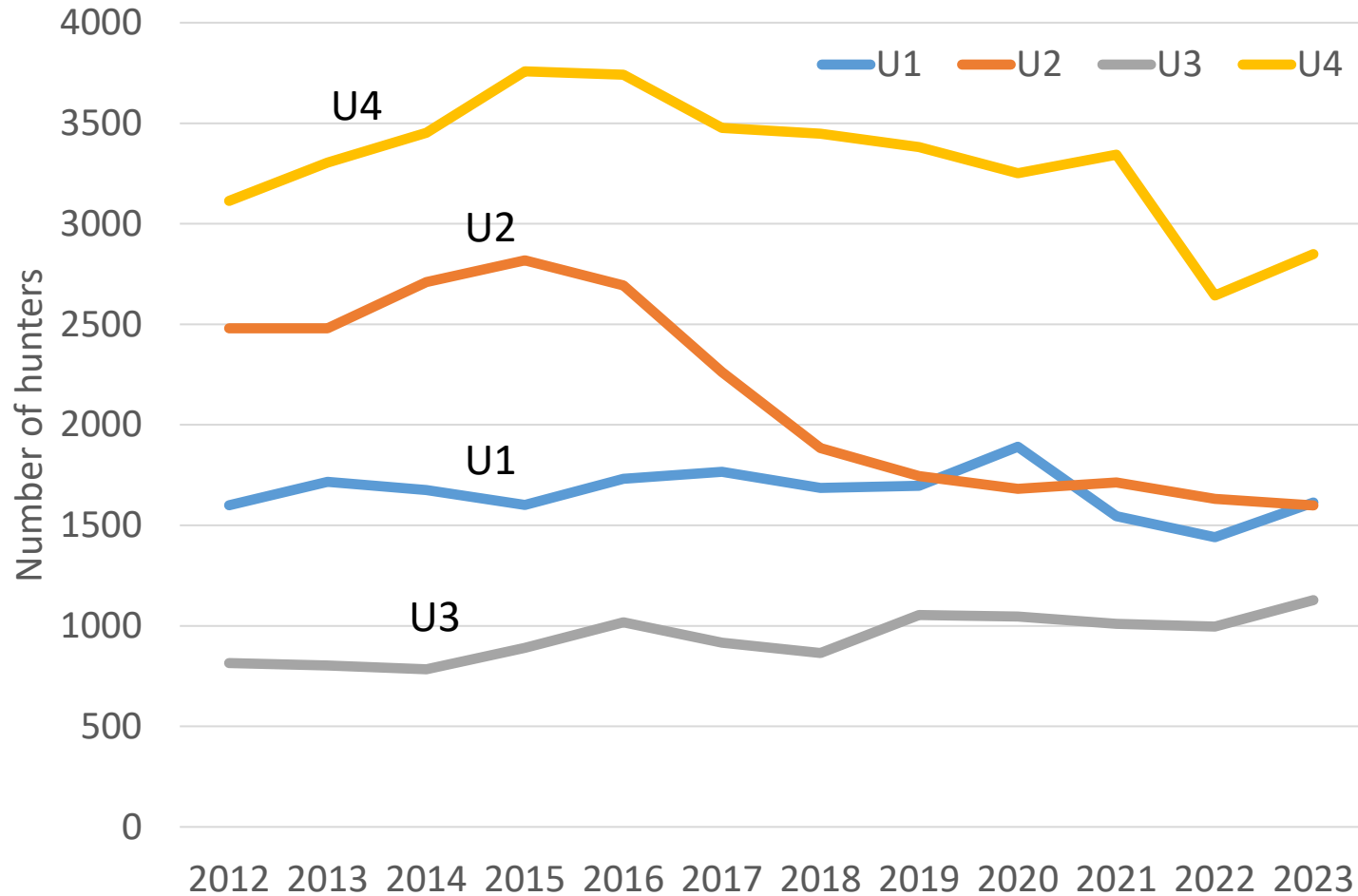
Deer – Units 1-4

ADF&G estimated harvest



Deer Unit 1-4

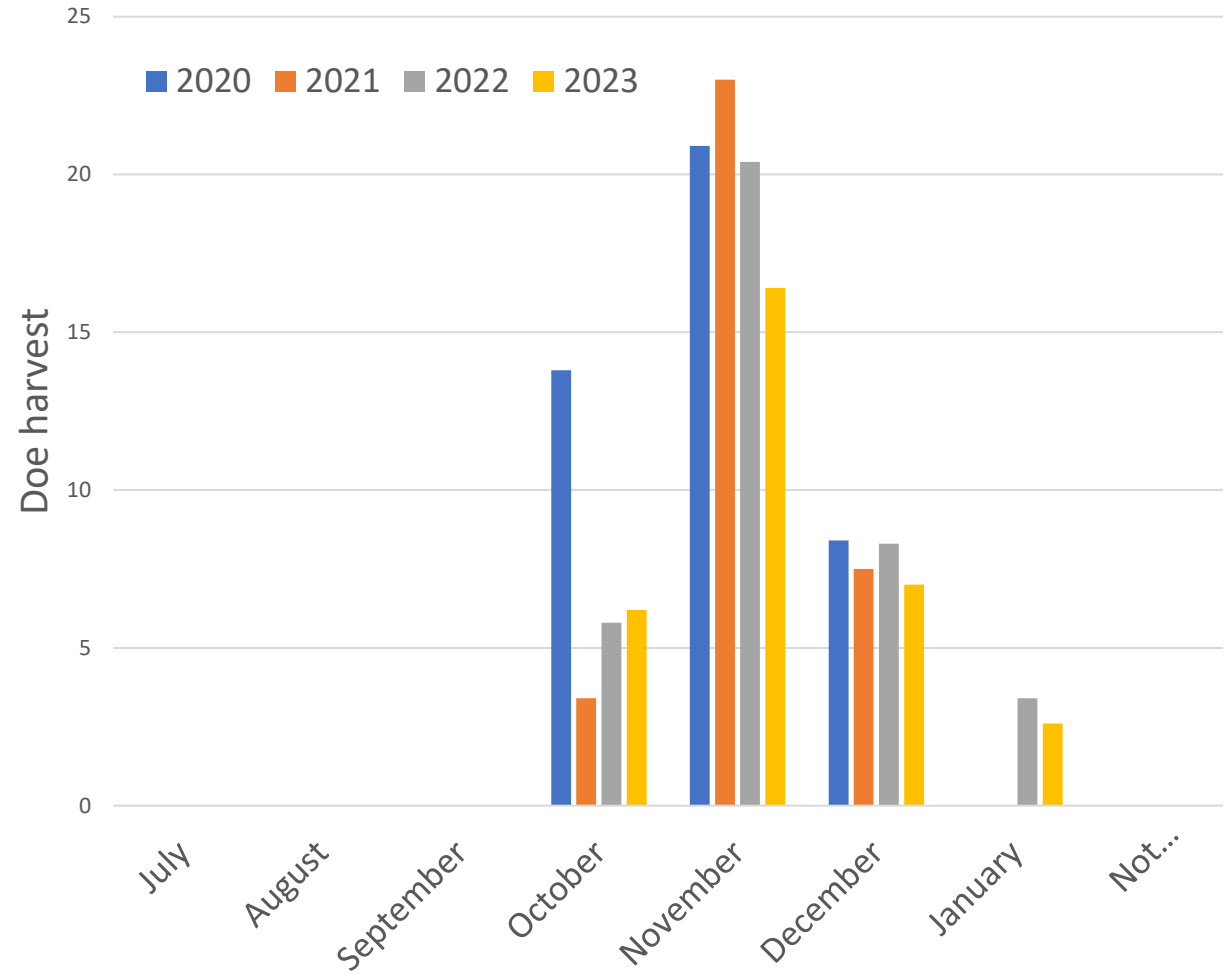
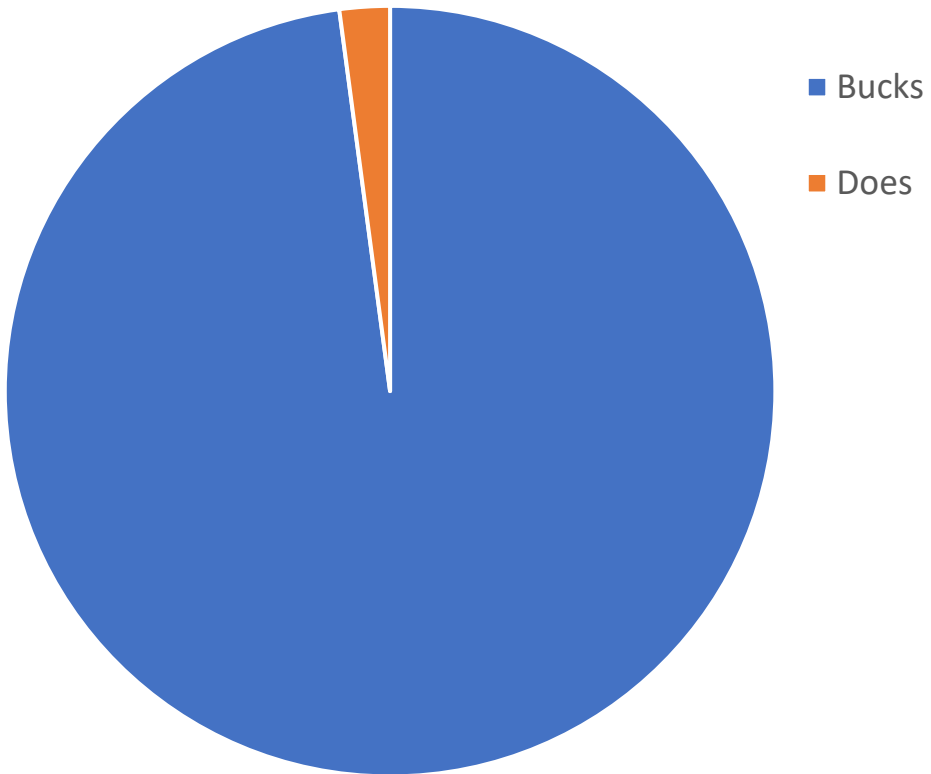
Number of hunters



- Harvest effort trends align with harvest trends
- Unit 2 harvest and effort level declined over the last ten years but appears to be leveling out

Deer Unit 2 – Doe harvest

Deer harvest by sex 2020-2023





Mountain Goat

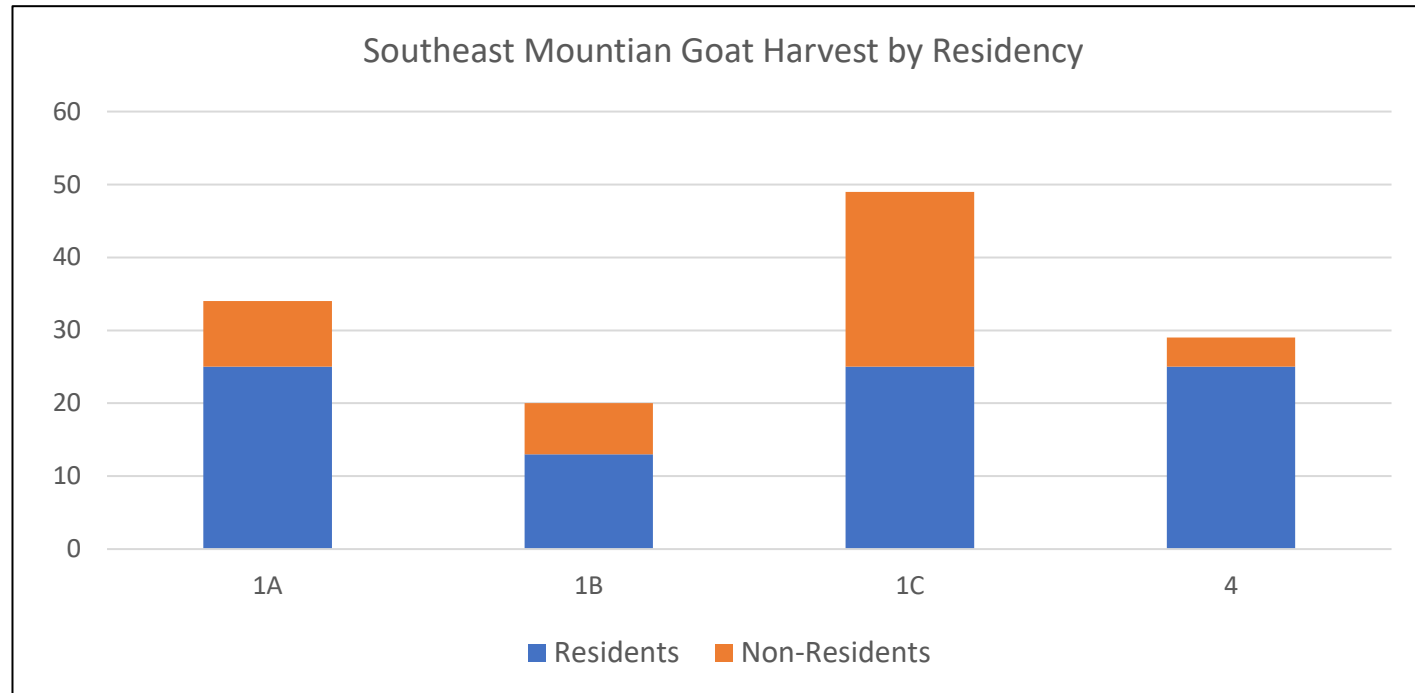
Federal permits 2004-2024

Permit	Issued	Hunted	Harvest
FG0103 (1A, 1B)	25	5	0
FG0504 (5A)	50	12	3
FG0507 (5B)	13	3	3

ADF&G registration permits

Unit	2020			2021			2022			2023		
	Hunters	Harvest	% success	Hunters	Harvest	% success	Hunters	Harvest	% success	Hunters	Harvest	% success
1A	46	38	83%	54	21	39%	64	42	66%	43	34	79%
1B	52	27	52%	39	23	59%	52	27	52%	56	20	36%
1C	98	40	41%	66	35	53%	64	44	69%	75	49	65%
1D	55	24	44%	54	22	41%	46	16	35%	57	15	26%
4	99	38	38%	70	28	40%	98	31	32%	90	29	32%
5A	5	2	40%	3	0	0%	4	1	25%	3	2	67%

Goat harvest and effort by residency and community - 2023



Unit 1A

- 34 goats harvested
- 74% AK residents
- 46% Ketchikan residents

Unit 1B

- 20 goats harvested
- 71% AK residents
- 63% Petersburg/ Wrangell residents

Unit 1C

- 49 goats harvested
- 62% AK resident hunters
- 55% Juneau residents

Unit 4

- 29 goats harvested
- 81% AK resident hunters
- 72% Sitka residents

Moose – ADF&G registration permit

Unit	2020			2021			2022			2023		
	Hunters	Harvest	% Success	Hunters	Harvest	% Success	Hunters	Harvest	% Success	Hunters	Harvest	% Success
01A	9	2	22%	22	2	9%	13	3	23%	8	3	38%
01B	185	21	11%	187	33	18%	194	32	16%	197	31	16%
01C	375	79	21%	282	58	21%	303	56	18%	307	54	18%
01D	215	28	13%	200	14	7%	200	25	13%	191	27	14%
03Z	613	93	15%	602	95	16%	572	86	15%	626	113	18%
05A	158	64	41%	141	63	45%	136	52	38%	129	50	39%
05B	14	5	36%	20	11	55%	22	9	41%	32	9	28%

Unit 1A Federal Moose

Year	Hunters	Harvest	% Success
2020	4	0	0%
2021	1	1	100%
2022	4	0	0%
2023	8	1	13%
2024	1	1	100%



Elk – Unit 3

Permit	Permit type
DE318	Drawing - archery
DE321	Drawing – early rifle
DE323	Drawing – late rifle
RE325	Registration
FE1234	Federal Elk Permit

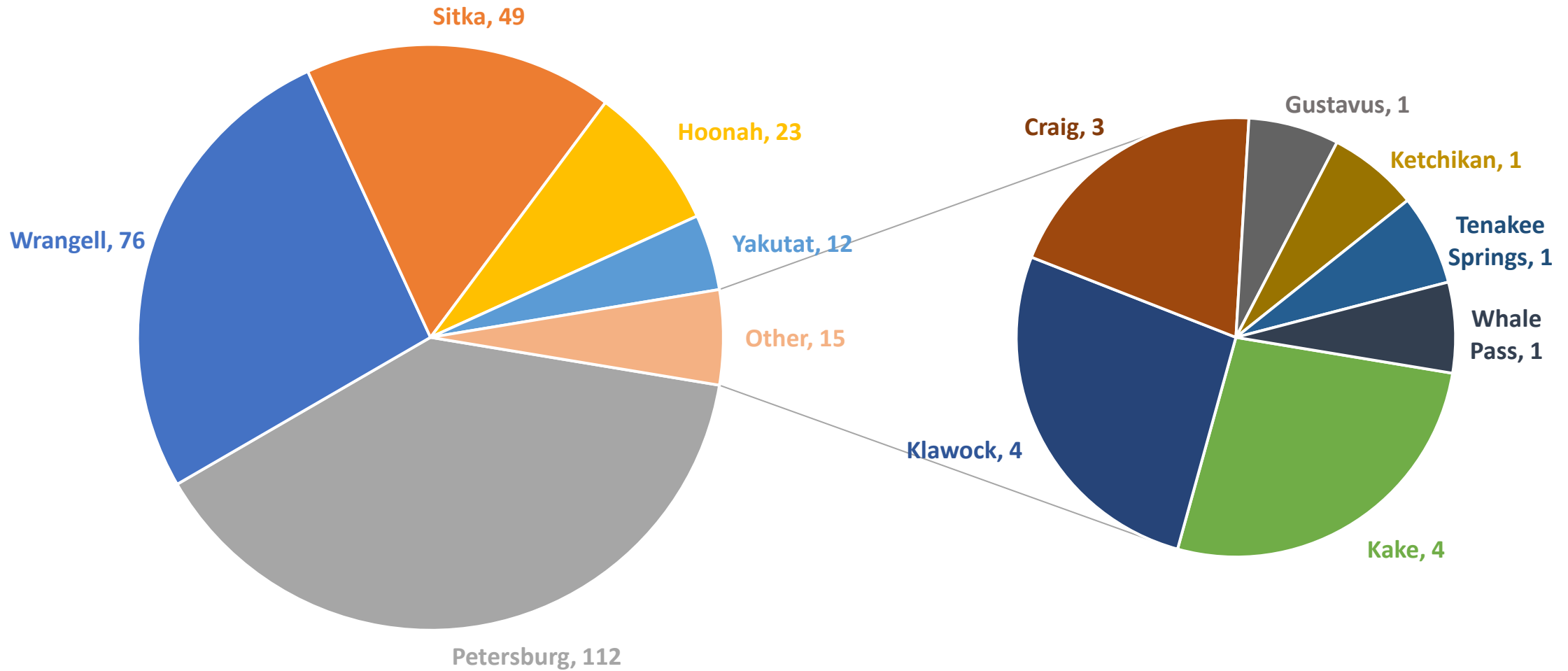


Permit	2021			2022			2023			2024		
	Hunters	Harvest	% Success	Hunters	Harvest	% Success	Hunters	Harvest	% Success	Hunters	Harvest	% Success
FE1234	-	-	-	17	0	0	13	0	0	17	0	0%
DE318	7	1	14%	6	1	17%	7	0	0%	-	-	-
DE321	20	2	10%	13	2	15%	26	3	12%	-	-	-
DE323	22	2	9%	20	0	0%	10	0	0%	-	-	-
RE325	9	0	0%	22	2	9%	17	0	0%	-	-	-

*No Federal harvest has occurred
 *2024 Sport harvest is pending

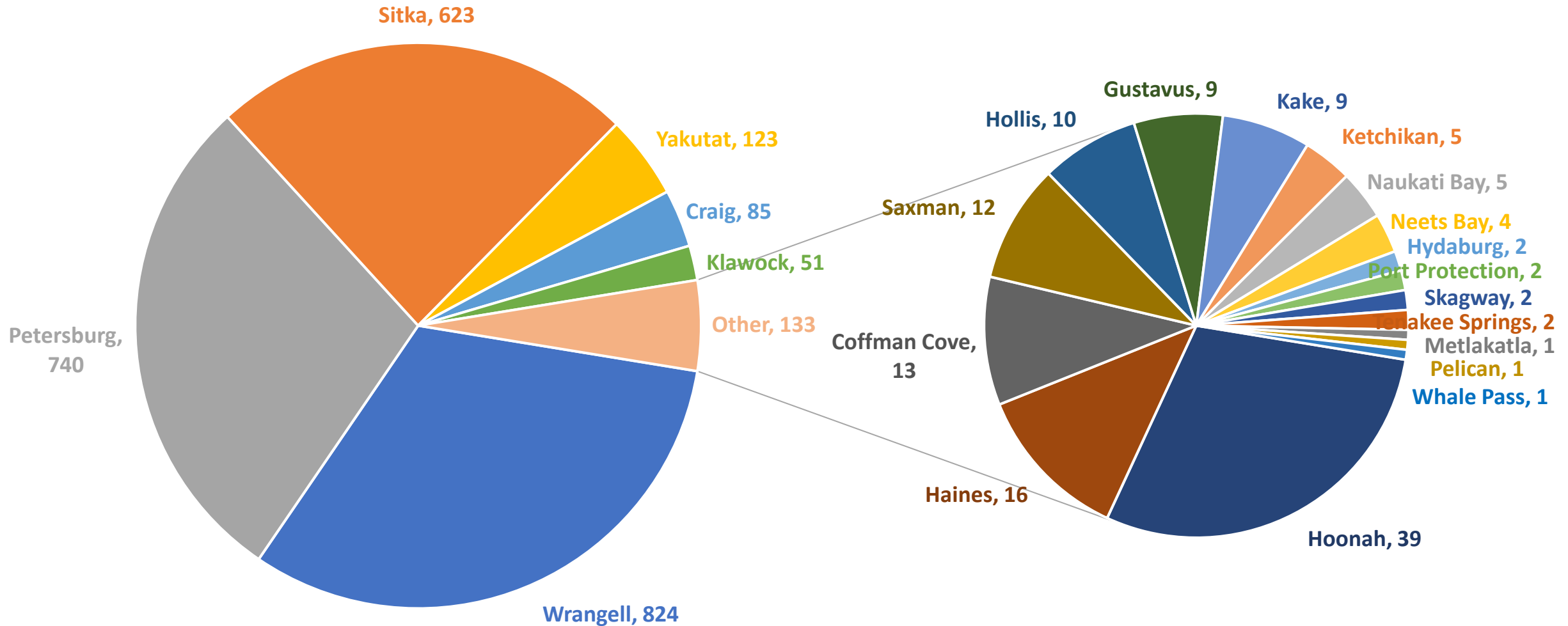
Designated Hunters by community

Permits issued 2024



Designated Hunters by community

Permits issued 2014-2023



Wolf – Unit 2

2020 - 68 wolves
2021 - 66 wolves
2022 - 62 wolves
2023 - 71 wolves
2024 - 74 wolves



Nov. 15th – Dec. 15th season in 2024

A photograph of a person standing in a forest, holding a rifle. The person is seen from behind, wearing a dark jacket and pants. The forest is dense with trees, and the sun is shining through the trees, creating a bright, hazy atmosphere. A semi-transparent white box with black text is overlaid on the image.

Questions or comments