



Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 - 6199



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

OSM 20072.KW

AUG 05 2020

Alissa Rogers, Chair
Yukon-Kuskokwim Delta
Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairwoman Rogers:

This letter responds to the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council's (Council) fiscal year 2019 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. Climate Change Impacts to Subsistence Fish and Wildlife and Habitat

Council members have shared at length their observations of changes to subsistence fish, wildlife, and habitat in the areas around their communities and are extremely concerned for the continuation of their subsistence way of life. The Council stressed that increasing winter storms and weather events such as the extreme ice storm that delayed this very meeting is causing great impact to all the animals. Ptarmigan are declining because there is no snow for protective cover. Hard freezing rain soaks their feathers and causes them to freeze to death. Moose have difficulty foraging and escaping predators on the slick ice and caribou are unable to scrape through inches thick ice covering the ground to access their food. Extreme hot summer temperatures and low, warm water has caused many fish to die. Council members recounted many observations this past summer of dead salmon floating downriver prior to spawning, and dead whitefish and even dead salmon smolt due to very low and warm waters on both the Yukon and Kuskokwim Rivers. The rivers are no longer breaking up as Council members remember. Now, the thinner ice melts in place and does not create the scouring floes like in the past. The timing of seasons are changing, causing animal and bird migrations to shift.

Council members relayed the changes they have seen in their lifetimes and the last ten years are nothing like they or their Elders have ever experienced. The Council wishes to convey to the Board

that these changes are very real and to raise awareness for the gravity of the impact these changes have on subsistence resources.

Response:

The Board shares the Council's concern over the impact of climate change on the fish, wildlife, and habitat essential to continuation of the subsistence way of life. As the Council notes, over the last ten years, weather and environmental conditions affecting animals have become highly unpredictable and deviated from historical conditions. While the Board is not positioned to address the underlying causes of climate change, the regulatory process can be used to ensure that changing timing and distribution of subsistence practice is supported rather than constrained by regulations.

Along with Council and Board meeting transcripts, annual reports provide a record of testimony about changes in fish and wildlife populations. Documentation of changes to ptarmigan, moose, and fish populations observed by Council members helps build on this body of local traditional knowledge. This information can be used to inform regulatory changes that benefits Federally qualified subsistence users.

Your Council is not alone in identifying climate change as a pressing challenge to subsistence practices. Within the last six years, nine of the ten Regional Advisory Councils have raised the issue of climate change and its effects on subsistence resources and activities in reports to the Board. Reporting on the 2019 season, other Regional Advisory Councils also specifically highlighted the effects of warmer temperatures and lower water levels on fish runs as a key concern. For example, the Bristol Bay Subsistence Regional Advisory Council stated in their most recent report that the summer season had been hotter than normal and affected river levels and finfish populations. The Eastern Interior Alaska Subsistence Regional Advisory Council reported that warmer summer waters resulted in salmon die-offs in their region. The Eastern Interior Council also expressed concern about how the warmer waters would affect salmon fry and the long-term effects to runs.

The Office of Subsistence Management is working to facilitate a future All-Council meeting, and the Councils may decide to elevate climate change—along with its effects on subsistence practices—as a key topic at this meeting. The way in which the regulatory system can facilitate and support adaptations to climate change may also be a theme worthy of presentations and discussion at this state-wide meeting.

2. Climate Change Impacts to Subsistence Activities, Travel, and Access to Resources

Changes occurring in the weather in recent years are causing more and more challenges for people to access subsistence resources and safely preserve harvested foods. The lack of winter snow has greatly hampered winter travel by snowmachine to conduct traditional subsistence hunting and fishing activities. Thin ice on lakes and rivers has resulted in extremely dangerous winter travel, jeopardizing the safety of those venturing out in the Yukon-Kuskokwim Delta region. Winter subsistence fishing and trapping activities require ice thick enough to safely jig for fish, to set traps and under ice nets. Warmer winter temperatures make it difficult to freeze subsistence foods outside and store them safely over the winter as has been done traditionally. Increasingly hot summertime temperatures have created a challenge for safely preserving harvested meat and fish. Overall, these

environmental changes are impeding subsistence access to many resources and impacting the ability to safely harvest and store subsistence foods.

Response:

The Board shares the Council's concern over the impact of climate change on the safety and viability of subsistence practices. While the Board is not positioned to address the underlying causes of climate change, the regulatory process can be used to ensure that changing timing and distribution of subsistence practice is supported rather than constrained by regulations.

When customary preservation measures are no longer possible, this can reduce the amount of food available to communities. While opportunity to harvest may exist, the amount of food that can ultimately be safely stored and eaten is reduced, resulting in decreased food security. Communities may find themselves investing energy in hunting and fishing for foods, which then spoil, failing to provide a dependable source of food throughout the year. In the context of climate change, the Federal Subsistence Management Program's prioritization of "subsistence opportunity" intersects with a wider concern about food security in rural areas.

Obstacles to continuing with a traditional yearly cycle include shifts in the timing and migration of fish and animal populations, as well as their distribution and local abundance. While subsistence opportunities can be precluded by a warming environment, such changes may also bring new or increasing opportunities to harvest other species. Regulations will need to accommodate such strategies for resilience in subsistence systems. New opportunities could be opened through alternative means of travel and access (such as open water rather than sea ice), new food preservation technologies, and expanded availability of certain species whether through increased abundance or their movement into the northern expanses of their ranges.

Communities are already adapting to changing conditions by altering practices and technologies, as well as by working within the regulatory process. Informal and formal sharing of traditional knowledge about how to safely travel and preserve food in a wide variety of conditions is one way in which Federally qualified subsistence users can adapt to warmer weather. Working through the regulatory process, proposals to adjust seasons and methods and means need to be considered in order to accommodate changing conditions. The Council may want to consider inviting speakers from across the Circumpolar North who can address adaptive hunting, fishing, travel, and preservation practices, as well as use of the regulatory process in similar contexts.

3. Request for Continued Research and Information to Address and Mitigate Climate Change Impacts in the Y-K Delta Region

The Council requests Federal land managers and other agencies to engage in research to better understand the impacts of climate change on important subsistence resources and work on possible mitigation measures that will help support subsistence communities. The Council requests the Federal subsistence program continue to share this information with the Council and engage in dialog with the Council and communities on strategies to best address changing subsistence resources and ensure continued subsistence opportunity into the future.

Response:

The Board encourages cooperating land-management agencies to develop investigative plans that examine how recent changes in the environment are affecting fish and wildlife populations, and in turn, subsistence. This research can support mitigation that includes responsive Federal subsistence regulations.

Through the Fisheries Resource Monitoring Program (FRMP), the Technical Review Committee and the Board have continued to seek research proposals that fund projects addressing changes in subsistence fisheries resources in the context of climate change. Priority Information Needs (PINs) are established by the Councils to serve as parameters for researchers to develop proposals. The Council may include climate change impacts in its upcoming 2020 PINs development. Unfortunately, the FRMP only applies to subsistence fisheries, and there is no corollary of the FRMP for wildlife resources. The Council may also want to work with your Council Coordinator to build collaborative research arrangements with other State, Federal, non-profit, and academic organizations that share interest in documenting the impacts of climate change on local ecosystems and food security.

In addition, your Council can invite representatives from State, Federal, non-governmental, and other research organizations to give presentations on climate change effects and mitigation at its regular meetings. A particular topic of interest may be mitigation measures implemented in other Arctic and Subarctic contexts, with a focus on how governance of subsistence hunting and fishing can support continued food security. Inviting speakers to Council meetings can provide an ideal opportunity for connecting with researchers and communicating shared topics of concern for future investigation. Some organizations to consider include:

- Alaska Center for Climate Assessment and Policy
- Alaska Climate Adaptation Science Center
- Alaska Department of Environmental Conservation: Climate Change in Alaska
- Experts identified through the U.S. Climate Resilience Toolkit
- Scenarios Network for Alaska + Arctic Planning
- The Alaska Native Tribal Health Consortium
- The Inuit Circumpolar Council Conservation of Arctic Flora and Fauna (CAFF)
- Exchange for Local Observations and Knowledge in the Arctic (ELOKA)

4. Adaptive Management Strategies to Respond to Changing Subsistence Resources, Access, and Preservation of Subsistence Foods

The Council requests the Federal Subsistence Board consider the issues raised in this report regarding climate change when making recommendations on Federal subsistence fish and wildlife regulations. Changing environmental conditions, shifting seasons and migratory patterns, and safe access to subsistence resources will likely continue to create the need for more flexible regulations and management strategies into the future. Strategies discussed by the Council include shifting the fall moose hunt to later in the season when temperatures are cooler and moose are more active, which would result in more successful hunts, as well as better meat preservation. A to-be-announced hunting season for moose in winter so that subsistence opportunity occurs when the snow and ice

conditions are conducive for safe travel is another option. Salmon fishing opportunities when the weather is good for drying fish with reduced risk of spoilage should also be examined.

Response:

The Board acknowledges the Council's request that it consider the effects of climate change on fish, wildlife, and subsistence practices when making recommendations on subsistence regulations. Changes to the availability and seasonality of resources can be accommodated by submitting proposals for a change in season, harvest limits, or methods and means. If the Council decides and votes on the record to submit a proposal, your Council Coordinator and OSM staff can assist you in drafting it. Delegation of authority enables managers to respond more quickly to unpredictable seasons and will likely need to be used with increasing frequency given that climate change may cause the timing of certain subsistence resources to fluctuate widely from year to year.

Special Actions provide additional flexibility and can be used when the regular fish or wildlife regulatory cycle cannot accommodate unanticipated needs for subsistence access in the short term. Special Actions may be submitted either as Emergency Special Actions (duration of 60 days or less) or Temporary Special Actions (duration of 61 days or more).

The Federal Subsistence Management Program will remain actively engaged with all of the Regional Advisory Councils and with rural Alaskans to ensure the program is responsive to the needs of Federally qualified subsistence users.

5. Ongoing Concerns About Seabird Die-offs, Sick Seals, and Request for Continued Informational Updates About Marine Environments Integral to Subsistence

The Council raised the concern about sick and dying marine life in the previous Annual Report to the Board and appreciated receiving informational reports by lead agencies on this topic and a venue to share local observations. While the Council recognizes that the marine environment is outside the jurisdiction of the Federal Subsistence Board, marine resources are essential for the life and livelihood of all communities in the Yukon-Kuskokwim Delta region. What is occurring in the marine environment in integrally connected to the subsistence way of life in the region, as well as the life and well-being of critical subsistence resources such as salmon, seals and migratory birds. The Council very much appreciates the opportunity to receive the latest reports on these subjects and hopes to continue this dialog and information sharing at future meetings.

Response:

The Alaska Marine Ecosystem Status Reports, developed by the National Oceanic Atmospheric Administration (NOAA), are an excellent source of information regarding the health and trends of Alaska marine environments. These Ecosystem Status Reports (<https://access.afsc.noaa.gov/REFM/REEM/ecoweb/Index.php?ID=0>) are produced annually to compile and summarize information about the status of the Alaska marine ecosystems. Four marine regions are highlighted: Eastern Bering Sea, Arctic, Aleutian Islands, and Gulf of Alaska. The recent Eastern Bering Sea report provides detailed information on physical and environmental marine trends, marine ecosystem trends, seal and whale trends, and fishing and human dimensions trends.

The Board encourages the Council to work with their Council Coordinator to invite experts from NOAA, US Fish and Wildlife Service, National Park Service, US Forest Service, Alaska Department of Fish and Game, universities, and other Alaska centric entities to present specific topics of interest at meetings.

6. Concerns About Observed Songbird Declines in the Y-K Delta Region

The Council is very concerned about songbird declines observed in the region. Several Council members reported that in recent years they have seen fewer and fewer songbirds while out on the land and it is unusually quiet on the tundra. Council members noted that they have enjoyed the song of little birds around their fish camp throughout their entire lives, but now when they bring their grandkids into the wilderness in the spring, it is quiet. While songbirds are not used for subsistence, they are a part of what we love about subsistence life. Additionally, birds such as Arctic terns, which are usually seen in abundance around communities throughout the Yukon-Kuskokwim Delta Region are encountered less and less. Council members are concerned what this tundra wetlands and songbird decline means for the rest of the environment and wonder if it is related to the seabird die-off.

Response:

Migratory songbirds, the most abundant family of birds, provide an enchanting soundtrack to our brief springs and summers in Alaska. Songs are a male's attempt to attract females to their territories to nest as well as a signal to other males that a particular patch of ground is occupied. Unfortunately, your observations that each spring is quieter than the last is supported by monitoring efforts such as the Breeding Bird Survey and Alaska Landbird Monitoring Survey programs. A recent summary of bird declines in North America states that over 3 billion birds have been lost since 1970. No single factor is causing the declines; instead, there is a combination of factors, including the loss of winter habitats, contaminants (such as pesticides), cats, collisions with windows and communication towers, and many others. Generally, songbird declines occur incrementally each year, unlike seabird die-offs that can occur suddenly and are very obvious.

Fortunately, there are things that we can do to help songbirds. This link describes seven simple actions we can take to make a difference: <https://www.birds.cornell.edu/home/seven-simple-actions-to-help-birds/>

Historically, seabird die-offs have occurred occasionally in Alaska; however, large die-off events have occurred each year since 2015. Consistently, dead birds examined from the Bering and Chukchi seas during these recent die-offs were determined to have died from starvation. Seabird carcasses from the 2019 die-off events were collected from multiple locations and sent to the U.S. Geological Survey National Wildlife Health Center for examination and testing. Initial results indicated that starvation was the cause of death for most locations. However, in southeast Alaska, exposure to saxitoxin (a biotoxin associated with paralytic shellfish poisoning) was linked to a localized die off of breeding Arctic Terns in June. Analyses of tissue samples for harmful algal bloom toxins are on-going and results will be shared when they become available. In summer 2018, two dead birds (a black-legged kittiwake and thick-billed murre) tested positive for a strain of avian influenza, but this virus is known to occur in otherwise healthy birds and there is no direct link to the

seabird die offs at this time. During winter and spring of 2020, and as of late May, there have been no reports of seabird die offs in Alaska. It is important to continue to track any bird die offs. The public is requested to report observations of sick or dead birds to the US Fish and Wildlife Service (USFWS) at 1-866-527-3358. Information to collect should include:

- Location, time and date observed
- Type and number of birds (counted or estimated)
- Photos of sick/dead birds
- Videos of any unusual behavior (approachable, drooping head and/or wings)

People should not attempt to capture or rescue birds that are still alive. In addition, people should not collect dead birds without prior training or collaboration with the USFWS.

The Council is also encouraged to contact the USFWS if they would like a presentation regarding birds in their region. Contacts include Jim Johnson (jim_a_johnson@fws.gov – land bird specialist) or Kathy Kuletz (kathy_kuletz@fws.gov – seabird specialist). Both work for the USFWS Alaska Region Division of Migratory Birds (<https://www.fws.gov/alaska/pages/migratory-birds>).

7. Concerns About Donlin Mine Potential Impacts to Subsistence

The Council is concerned about the environmental impacts to subsistence resources and changing access to these resources from the development of the proposed Donlin Mine. The Council is also concerned about the risk of spills or contamination to the Kuskokwim River and surrounding environment. While the Council understands the interest in this economic development in the region, the subsistence resources such as salmon are an irreplaceable part of life and livelihood for all communities on the Yukon-Kuskokwim Delta.

The Council has expressed concerns at previous meetings about the likely impacts to subsistence as reported in the Donlin Gold Project Final EIS ANILCA Section 810 analysis (enclosure), which indicates the mine “may significantly restrict” subsistence for every community in the vicinity and downriver of the mine as proposed – from Crooked Creek to the mouth of the Kuskokwim River. The Council also has very serious concerns about the proposed number of daily barges on the Kuskokwim River required to support the Donlin mine development and operations. Opportunity for subsistence fishing on the Kuskokwim is already limited for Chinook Salmon conservation measures. Barge traffic will increase up to 200 percent, with at least several barges heading upriver and downriver every day during open water on the river from break up to freeze up (June 1 to October 1). This vessel traffic would only add to fisheries management challenges and interfere directly with subsistence fishing opportunity. Subsistence fishers will have to pull drift nets and move out of the way of a barge or dislodge set nets. The large and long lasting wake of large barges will cause bank erosion, thus impacting fish camps and nearshore fish habitat.

Additionally, the Council is gravely concerned about direct impacts on subsistence fisheries and resources from barge accidents spilling diesel fuel or other cargo, such as the cyanide that will be shipped to process gold at the mine site. Sensitive fish habitat and salmon smolt migrating downstream in early spring may also be negatively impacted by prop wash of large barges. Some critical spawning areas may be destroyed by the near constant large barge traffic, such as the

shallow water gravel bed below Kalskag that is known as the primary Rainbow Smelt spawning habitat. Communities will be at a direct risk of losing this highly valued subsistence resource. Rainbow Smelt are some of the most abundant fresh subsistence fish harvested in the spring by communities all along the Kuskokwim River as they migrate upriver to spawn. All of this would occur within the Federal waters of the Yukon-Delta National Wildlife Refuge.

Response:

Thank you for sharing your Council's concerns about the proposed Donlin Mine. Federal agency staff have been providing reviews and comments on the Donlin Mine for about seven years. Like you, the Board has been watching this proposal very carefully. There are clear concerns about the risk to the subsistence way of life on the Kuskokwim River.

On August 13, 2018, the US Army Corps of Engineers and the Bureau of Land Management issued their Record of Decision (ROD) on the proposed Donlin Gold mine project (<http://dnr.alaska.gov/mlw/mining/largemine/donlin/pdf/dg-usace-blm-rod-2018-08-13.pdf>). Other documents related to the Donlin Gold mine project including the final Environmental Impact Statement can be found at <http://dnr.alaska.gov/mlw/mining/largemine/donlin/>

Sub-section C2.6 *Reasonable steps will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions* of ANILCA Section 810 Summary (Attachment C2) in the 2018 Joint Record of Decision states, "The design features, best management practices, agency mitigation, monitoring, and adaptive management opportunities are discussed in Chapter 5 of the Final EIS. These proposed measures are designed to protect various subsistence resources and their habitat and to reduce negative impacts from the proposed Donlin Gold mine." The Sub-section C2.6 also contains a table of Donlin Gold Mitigation Measures Relevant to Subsistence Uses and Resources (enclosure).

The Board recommends that your Council consider requesting presentations from agency staff and Donlin mine representatives on proposed mitigation measures. At that time, the Council can discuss its concerns regarding the project's potential impact to subsistence and determine how the Council can be kept informed on a regular basis on the implementation of these measures or even potentially participate in mitigation.

8. Address Sunken and Derelict Barges Polluting the Kuskokwim River.

The Council has ongoing concerns about the numerous sunken and derelict barges on the Kuskokwim River. These sunken barges are a safety hazard for people traveling by boat to conduct their regular subsistence activities and overall are contaminating the water with leaking fuel, oil, and other chemicals used onboard and in the barge engines. Some barges such as those located in Steamboat Slough just upriver from Bethel have long since been abandoned by the company that operated them and to date no agency has taken responsibility to clean up or remove them. A barge that sank near the Kwethluk River a few years ago continues to leak contaminants and has never been cleaned up. The clean-up and removal of the barge has not been addressed, even though the barge owner still operates on the river. The Council is very concerned about the impacts of these barges and the pollutants that continue to flow into the waters of the Kuskokwim affecting

subsistence fish and contaminating the water that communities drink. The Council requests that the agencies responsible address the issue. Furthermore, the Council would like to highlight because the contaminants from sunken barges have not been dealt with all these years, there is a high probability that problems caused by the greatly increased barge traffic associated with Donlin Mine would never be addressed, even if there was an accident.

Response:

Thank you for bringing this concern to the Board's attention. The issue of abandoned and derelict vessels is prominent in Alaska. The State of Alaska's Abandoned and Derelict Vessels Act AS 30.30 states, "A person may not store or leave a vessel in a wrecked, junked, or substantially dismantled condition or abandoned upon any public water, or at a port or harbor, of the state, without the consent of the agency having jurisdiction of the water, port, or harbor, or docked at any private property without the consent of the owner of the property" (see <http://www.touchngo.com/lglcntr/akstats/Statutes/Title30/Chapter30.htm>).

In 2014, the ad-hoc Abandoned and Derelict Vessel Task Force was formed to learn from other states, understand Alaska's current derelict vessel laws, and examine Alaskan case studies. The Task Force representatives included Alaska Department of Natural Resources, Alaska Department of Environmental Conservation, Alaska Department of Transportation, Alaska Department of Fish and Game, Alaska Association of Harbormasters and Port Administrators, U.S. Coast Guard, National Oceanic and Atmospheric Administration, Environment Protection Agency, Orutsararmiut Native Council, Alaska Marine Response, and Office of Senator Lisa Murkowski (see enclosed 2018 Briefing for SB92 Derelict Vessels in Alaska).

In May 2018, the State of Alaska passed Senate Bill 92 that authorized creating a derelict vessel program under Alaska Department of Natural Resources. The bill was signed into law in November 2018.

On March 11, 2020, the Alaska Superior Court awarded the State of Alaska \$4.2 million in a barge sinking case (see enclosed press release). This case involved the *Delta Chief*, a barge sunk on the submerged lands of the Kwethluk River outside Bethel, Alaska, on October 4, 2012.

The Board suggests that your Council consider sending a letter to the Alaska Department of Natural Resources regarding its concerns about the sunken and derelict barges on the Kuskokwim River. Your Council also might want to consider inviting an Alaska Department of Natural Resources representative to one of its public meetings to discuss this issue and learn about what is being done.

9. Council Member Travel and Ample Time for Full Participation and Sharing of Traditional Knowledge at Council Meetings

The Council requests more time to allow for safe travel to Council meetings. While all travel is always dependent on weather in the Yukon-Kuskokwim Delta, recent increases in winter storms and freezing rain have created more flight delays and cancellations, which are a real challenge for achieving quorum at meetings. Council travel is often booked immediately prior to the start of the meeting, and meeting days extend late into the night to complete all the business of a very full agenda

covering subsistence management in a vast Yukon-Kuskokwim Region, which is not reasonable. The Council requests that the Board consider more realistic travel-time requirements to get to the Council members to a meeting safely with ample time to be rested and able to participate in full meetings. All Council members should have an opportunity to participate in person at the meetings to share traditional knowledge from throughout the entire region. Often coastal community representatives are at a disadvantage for flying due to the unpredictability of marine weather. A little more time for travel to account for likely delays would help increase the chance for Council members to make it to the meeting in time to participate in person.

Response:

Usually, Regional Advisory Councils meet at least twice a year; once in the fall (August through November) and once in the winter (February and March). Most of the time, Councils take two days to complete their agenda; on some occasions it takes three days. The *Federal Subsistence Regional Advisory Council Membership Application and Nomination Packet for 2020* indicates that “Council members are not paid for their volunteer service; however, their transportation and lodging are pre-paid and per diem is provided for food and other expenses under Federal travel guidelines.” According to the Federal travel regulations, travel must be arranged in a way to minimize expenses paid by the Government; thus, no lodging and per diem are paid on a day when no business or travel occurs, that is why the Council travel is booked immediately prior to the start of the meeting.

Historically, the Federal Subsistence Management Program has been very accommodating to the Council members whose flights were delayed or cancelled due to weather or airline issues, and arranged for flight reservations and meeting start date changes. Since it is in the Federal Subsistence Management Program’s best interest to have all Council members present at a meeting in person, this accommodation will continue. Additionally, the Federal Subsistence Management Program provides a toll-free telephone line for Council members who are not able to travel outside of their communities for a variety of reasons. Weather delays can occur unexpectedly and last for extended periods of time; while, the Federal Subsistence Management Program cannot justify flying Council members to a community a day or more in advance of the meeting, some flexibility in scheduling travel can be explored where possible.

However, considering the specific needs of this Council (such as additional time necessary for Yup’ik-English/English-Yup’ik translation during meetings and a typically extensive agenda), the Board will suggest that the OSM Assistant Regional Director allows extending the Council meetings to three days when necessary. This will allow to have ample time for all of the issues on agenda and prevent meeting days extending late into the night.

10. Importance of Appointing More Yukon River and Coastal Representatives for Balanced Membership on the Council

The Council remains very concerned about the number of vacancies created because of an insufficient number of Council appointments in the last two years. The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council serves a large and diverse region with over 40 communities, including several of the largest rivers and coastal deltas in both size and importance for subsistence fishing. The Council cannot adequately represent the many communities of the region and address

resource management on the diverse subsistence hunting and fishing issues from the Yukon to the Kuskokwim, Kanektok, and Goodnews rivers and deltas and everything in between without a full membership of the 13-seat Council with balanced representation from each part of the region. The complexity of fisheries management on the Yukon and Kuskokwim rivers in particular requires having at least several representatives who are residents from several villages along each river and coastal areas to adequately inform the Council's recommendations. The recent lack of sufficient Yukon River and coastal representatives has hampered the Council's ability to fully inform management on subsistence issues specific to communities in these regions of the Yukon-Kuskokwim Delta. The Council requests the Board's support for outreach in the region to recruit a balance of applications from the 41 villages and to ensure that the Secretary of the Interior appoints highly qualified applicants from across the region.

Response:

The 1992 Record of Decision for *Subsistence Management for Federal Public Lands in Alaska* states that “the Regional Advisory Council system required by ANILCA Section 805 was created to provide subsistence users the opportunity to participate effectively in the management and regulation of subsistence resources on Federal public lands.” Moreover, the Record of Decision directs that “to the extent possible, the size of the Council and distribution of the membership within the region will be designed to ensure the maximum participation in the Federal Program by local subsistence users.”

In accordance with ANILCA and the Record of Decision mandates, the Board fully support outreach efforts for the Yukon-Kuskokwim Delta Region to insure the recruitment of a balanced and diverse pool of applicants and nominees. In order to fill all the vacancies and forward a full set of the appointment recommendations to the Secretaries of the Interior and Agriculture for their review and decision, the Board needs to have an ample number of applications and/or nominations from the Yukon-Kuskokwim Region. The Board will recommend the most qualified applicants to the Secretaries; however, it is important to note that the Board does not make the final decision over which recommended applicants are appointed to the Councils. After the Board submits its appointment recommendations to the Secretaries, all recommended applicants undergo a vetting process administered by the Department of the Interior. The Board and OSM are not privy to the vetting information and do not participate in this process. The process is set up this way to make selection impartial and objective. The Secretaries finalize appointments to the Councils after the completion of vetting and review process by the Department of Interior.

Additionally, during the next biennial charter review in 2021, the Board recommends that the Council submit a request to add geographic membership balance language to the Council's charter. The Board recommended and the Secretaries approved similar requests from two other Councils—the Kodiak/Aleutians and Western Interior—in 2015 and 2019 respectively. Your Council should work with the Council Coordinator to draft the request. The Board will review the Council's request and submit its recommendation to the Secretaries for the final review and decision.

11. Recognition in Honor of the Late Harry Wilde, Sr.

The Council requests the Board formally recognize Harry Wilde, Sr. for his lifetime of service and dedication to subsistence in the Yukon-Kuskokwim Delta region. Harry Wilde, Sr. was a long-time

member and Chair of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council, serving from 1993 to 2014. Sadly, he passed away shortly before the winter 2020 Council meeting. The Council would like to honor his legacy as a tireless subsistence advocate and revered elder.

Response:

Thank you for making this request to the Board. The Board appreciates the service of each and every Council member and values long term members' dedication to advocating for subsistence. The Board will gladly recognize Harry Wilde, Sr. formally during its next regulatory meeting in January of 2021. The Board encourages Council members to share their stories and photos of Mr. Wilde, Sr. during the fall 2020 Council meetings. This information can be compiled and included in the Board's recognition of Mr. Wilde, Sr.

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 Federally qualified subsistence users of the Yukon-Kuskokwim Delta Region are well represented through your work.

Sincerely,



Anthony Christianson
Chair

Enclosures

cc: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Federal Subsistence Board
Susan Detwiler, Assistant Regional Director, Office of Subsistence Management
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
Lisa Maas, Acting Subsistence Policy Coordinator, Office of Subsistence Management
Tom Kron, Acting Council Coordination Division Supervisor,
Office of Subsistence Management
Acting Wildlife Division Supervisor, Office of Subsistence Management
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management
Acting Anthropology Division Supervisor, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Katerina Wessels, Council Coordinator, Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Project Coordinator, Alaska Department of Fish and Game
Administrative Record