



**Southcentral Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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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 Southcentral Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2021 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 via video/teleconference on October 13-14, 2021, the Council identified concerns and recommendations for this report. The Council approved this Annual Report at its February 10-11, 2022 meeting. The Council wishes to share the following information and concerns dealing with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Southcentral Region:

**1. Customary and Traditional Use Determinations (C&T)**

The Council has concerns about the process currently being used to make C&T determinations and its relation to current and anticipated subsistence harvests. The Council found it very confusing during its fall 2021 regulatory meeting to consider and address the many issues presented in proposals. The manner in which they were written, analyzed, and combined made it very difficult for the Council to adequately concentrate on each proposal. For instance, wildlife proposal **WP22-16/17/18/19/21/22/23/24/26a** was a combination of proposals regarding the harvests of moose, caribou, goat, and sheep resources for the residents of Moose Pass in four different game management units. In addition, for some of these C&T proposals, the Council felt there was a lack of information or substantial evidence to make an adequate and well-supported C&T determination.

The Council suggests that the Office of Subsistence Management make further efforts (with additional funding) to do research to get the information/evidence necessary for the Council to make a recommendation on proposed C&T determinations. The Council also suggests that when an area is up for C&T determination, that the effect this designation may have on surrounding

areas is also considered. C&T analyses should be wholly inclusive and should address all effects. A significant amount of additional C&T proposals are anticipated in the future on resources that, in some cases, are declining. It is important that a review of the strategy to address C&T determinations be done now so that any exacerbation of declining resource populations can be avoided. The Regional Advisory Councils need to receive the most comprehensive analyses with the most current data possible to make an effective decision regarding C&T determinations.

## **2. Subsistence Use Amounts**

The Council recognizes declining populations of fish and wildlife throughout the State. It recognizes the need for a review of Federal Subsistence Use Amounts to identify specific needs and subsistence uses for fish and wildlife. The Council requests that supporting staff substantiate the shortage of fish and wildlife statewide and then provide information on how Subsistence Use Amounts may be reviewed and changed to support subsistence users' needs and priorities during these periods of declining fish and wildlife populations.

The Council received a request from Ahtna Intertribal Resource Commission (AITRC) to put this item in its Annual Report and the Council is attaching that letter for full details. AITRC encouraged this Council to demand more proactive Federal subsistence management presence and activities regarding sustainable management of salmon fisheries on the Copper River. There was a request for this Council to develop Federal subsistence use amounts findings to include in this report to the Board; however, the Council cannot fulfill such a request without assistance from the Office of Subsistence Management (OSM). AITRC seeks to have Copper River Sockeye and Chinook Salmon Federal subsistence use amounts findings made on the anticipated Federal subsistence needs. There was no time for the Council to discuss this at its last regulatory meeting due to the large amount of required action items that the Council had to address. Therefore, the Council asks that the Board direct OSM to provide information at its winter meeting advising the Council how it may follow through on such requests. The Council would like to support efforts to conserve salmon on the Copper River and would like to know if Subsistence Use Amounts is a viable and productive way to move towards stronger Federal management of salmon on the Copper River.

## **3. Jurisdictional Issue to Provide for Federally Qualified User Harvest**

This report topic specifically addresses current and anticipated subsistence needs: Opportunity for Federally-qualified users to harvest finfish and shellfish in the salt waters of Prince William Sound (PWS) area. The Council recognizes that rural residents of this area have historically utilized crabs, shrimp, and other items found in the tidal zone and understands that there is a need for subsistence harvest of saltwater resources at the Federal level similar to what occurs in other communities throughout the state. These PWS rural and Tribal residents live within or on the edge of the Chugach National Forest (where land and freshwater streams are 'Federal public lands') and have hunted and fished upon these lands for decades. However, when they wish to dig a clam, they are only able to dig clams according to State regulations. They can put a shrimp pot out one-half mile from shore but only under State regulations. Everything from shellfish,

octopus, and crabs to the rockfish harvest limit is under State regulations.

Subsistence users are experiencing conflicts with other users for shellfish, octopus, shrimp, crab, finfish, and rockfish. Under State regulations, which provides no priority for Federally-qualified subsistence users, the allowable catch of these resources is limited and because of competing commercial and sport interests, subsistence users are not able to meet their subsistence harvest needs. The Council feels this is a disservice to subsistence users in this area.

There is a substantial need to shift jurisdiction in saltwater by using a co-management strategy in order to provide opportunities for subsistence users to obtain food. The Council would like to know what policies, standards, guidelines, and regulations (North Pacific Fishery Management Council, NOAA – National Marine Fisheries Service, etc., ANILCA, extra-territorial jurisdiction) can be explored to establish dual jurisdiction (Federal and State) for these resources to provide a meaningful opportunity for subsistence and personal use harvest.

#### **4. Fisheries Resource Monitoring Program (FRMP) – Research and Funding**

There are many key FRMP projects that will provide vital information on fish stocks in the Southcentral region. The Council is concerned about the shortage of funds for these projects in recent years as it seems the money set aside for these projects is reduced with each passing year. The Council would like to see the Federal Subsistence Management Program revise research and monitoring projects to include work that could be done by Tribes and regional organizations. Cooperative agreements with Native organizations and Tribal entities would better meet the intent of ANILCA. There is more competition for funding FRMP projects, and the Council would like to see more projects awarded to local Native and Tribal organizations as they have the traditional ecological knowledge to offer in addition to the skills required to successfully accomplish the FRMP project tasks. Further, the State of Alaska should develop their own programs for research and monitoring instead of competing with Tribes and local organizations for FRMP monies. The Council requests that the Board instruct OSM to investigate options for assisting local entities in receiving FRMP funds to continue critical research and monitoring of fish stocks and to report these options to the Council.

#### **5. Climate Change**

The Council would like more information and research on the impacts that ocean acidification and other recent effects of climate change have had on the fish stocks in the Southcentral region. The last two years of limited salmon runs have been quite alarming in various parts of the region. The Council would like to know if an organized effort or an FRMP project can be put forward to gather specific data that may explain the drastic changes observed in lower stocks for different salmon species, changes in salmon run timing, and various effects on shellfish. This would be a good project for Native/Tribal organizations where local traditional knowledge could be incorporated. The Council would support an FRMP research on finfish and shellfish in Prince William Sound with priorities on understanding the effect of ocean acidification on those resources. The information gathered from such a project would be crucial for the management decisions on the Copper River and other areas of Prince William Sound.

The Southcentral 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 Southcentral 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](mailto:deanna.perry@usda.gov), or 1-800-478-1456 or 907-209-7817.

Sincerely,

Richard (Greg) Encelewski  
Chair

Enclosure: Letter from Ahtna Intertribal Resource Commission to Southcentral Regional Advisory Council (*dated Aug 9, 2021*)

cc Federal Subsistence Board  
Southcentral Subsistence Regional Advisory Council  
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DeAnna Perry, Subsistence Council Coordinator, USDA – Forest Service  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record