



Southcentral Alaska Subsistence Regional Advisory Council

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Anthony Christianson, Chair
Federal Subsistence Board
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chairman Christianson:

The Southcentral Alaska Subsistence Regional Advisory Council (Council) submits this FY-2020 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 meeting via tele/video conference on October 7-8, 2020, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 24-25, 2021 meeting via tele/video conference. The Council wishes to share information and voice concerns dealing with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Southcentral Alaska Region.

1. Council Vacancies

For yet another year, there are vacancies on this 13-seat Council. The Council held its fall meeting with nine seated members. On December 2, 2020, four incumbent Council members' terms expired. Three new appointments for the Council were received on January 15, 2021, just five weeks prior to its winter meeting. Two incumbent members were not re-appointed and the Council currently still has three vacancies¹.

The Council reiterates its concern for the loss of crucial representation across the Southcentral Region as noted in its FY-2019 Annual Report. The lack of appropriate diversity and wide regional representation on the Council creates challenges for the Council members who must often make decisions affecting areas and groups in the absence of a local member who can best represent the users of his or her community. The Council continues to be concerned with the Executive Order on Evaluating and Improving the Utility of Federal Advisory Committees, dated June 14, 2019, and the impacts of this Executive Order on the Federal Subsistence Management

¹ Two incumbents and one previous council member were appointed after the Council finalized the wording for this Annual Report, seating a full council.

Program and Regional Advisory Councils.

In its FY-2019 Annual Report Reply, the Board encouraged the Council to “expand its outreach effort in its communities and throughout the Region to attract a wider pool of applicants, if the Council wishes to see all seats filled.” The Council does not believe that outreach is the issue. Twelve applications were received to fill seven vacancies for the anticipated December 2019 appointments and ten applications were received to fill eight vacant seats for the anticipated December, 2020 appointment. In the last two years, only one applicant was found to be ineligible for Council membership, yet four and three seats remained unfilled on this Council, respectively.

The Council asked the Board to send a letter to Secretaries of Agriculture and the Interior regarding its concern on this matter in its FY-2019 Annual Report. Although the Council was advised that the Office of Subsistence Management (OSM) responded to an information request from the Department of the Interior, it appears that no letter was sent from the Board to the Secretaries conveying this Council’s concern that all Regional Advisory Councils across the State experienced a significant decrease in representation. The Council feels that, especially with new administration personnel changes, it is necessary to send this letter to advise the Secretaries of the substantial impacts these Council membership reductions have on the work of the Councils. The Council respectfully makes a second request that the Board send the requested letter to the Secretaries to remind them that these Councils are provided for under ANILCA and that a lack of representation on the Regional Advisory Councils is detrimental to the intent of ANILCA.

2. Changing Climate Effects

Under Title VIII of ANILCA, this Council is mandated to review and evaluate proposed regulatory changes that allow priority for taking on public lands of fish and wildlife for non-wasteful subsistence uses. Changes in the Southcentral climate affect the ability of this Council to support or oppose seasons and bag limits and otherwise make knowledgeable recommendations. Previous actions by the Council have been made based on the traditional ecological knowledge of what was roughly a regular 20-year cycle pattern. Now, with influences such as changing wind patterns, migratory patterns, and travel conditions, the ability to predict the condition of the various subsistence resources is extremely difficult and therefore, it is problematic to recommend changes for harvesting these resources.

The performance of the fisheries across Southcentral Region was poor in 2020. A number of fisheries were closed to different user groups because of conservation concerns. The Council is concerned that this trend will continue and that it will be harder for subsistence users to maintain critical food supplies for their communities. There is an obvious need for extra resources to be utilized to maintain salmon runs on the Kenai and Kasilof rivers, the Copper River, and elsewhere across the Region.

The Board informed the Council of research being conducted by the U.S. Fish and Wildlife Service, Anchorage Fish and Wildlife Conservation Office, and the University of Alaska Anchorage, regarding stream temperature monitoring. In its FY-2019 Annual Report Reply, the Board stated that this research was expected to include work in the Gulkana River in 2020. The Council requests the results of any research, including fine-scale mapping of stream temperatures

and the use of various parts of the drainage system by juvenile and adult salmon in the Gulkana River area to be shared with the Council.

The Council will continue to express its concerns regarding changes in the environment observed and noted by its members, the public, and subsistence users across the region to the Board. Council members recognize the need to stay vigilant in monitoring these effects to make informed recommendations to effectively adapt Federal regulations to the dynamic parameters of climate change in Southcentral Alaska.

3. Individual National Park Service (NPS) Customary and Traditional Use Process

The Council appreciates that this Board deferred its action on the proposed delegation of authority to the NPS in determining Individual Customary and Traditional uses to allow the Regional Advisory Councils to provide input on this matter. The Council received information on the proposed process at its fall 2020 meeting and learned that the Wrangell-St. Elias Subsistence Resource Commission (WRST SRC) requested more information from the NPS. The Council had many questions and chose to take no action based on the information presented.

The Council would like to consider the additional information coming from the NPS to the WRST SRC before it makes any recommendation. It is imperative that the possibilities and ramifications of such a delegation of authority from this Board are fully explored. It is the Council's understanding that many other Regional Advisory Councils had questions and wanted additional information on this matter. It seems that overall, this issue is not well understood by the Regional Advisory Councils, nor by the subsistence users they represent. For these reasons, the Council respectfully requests that this Board postpone any action on this issue until critical questions are answered and vital information, needed to make an informed recommendation, is known.

4. State of Alaska Prioritizing Personal Use

The Council is concerned about the movements at the State level towards prioritizing de facto subsistence activity in non-subsistence areas. There are dangers in prioritizing 'personal use' of resources in areas around major urban centers where State subsistence activities are prohibited. The Council believes that the State managers are making political decisions by giving an identified population access in these non-subsistence areas. These decisions are not practical and will result in a significant reduction of resources in those areas.

The Council notes that several Federal fishing proposals submitted recently requested more restrictions than those existing under State fishing regulations. ANILCA provides a preference for harvest opportunity to the Federally qualified subsistence user. Subsistence regulations cannot be more restrictive than other regulated uses of the resource. Other user groups should be restricted before Federal subsistence users; however, with increased Federal proposals requesting restrictions on the Federal user and the increased prioritization of personal use in non-subsistence areas by the State, Federally qualified subsistence users are targeted to be the sole group burdened with sacrificing harvest to conserve the species.

The Council requests support for any ANILCA .804 analysis that may be required in the future,

due to a shortage of subsistence resources.

The Southcentral 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 the 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 of the Southcentral Alaska Region. If you have questions about this report, please contact me via DeAnna Perry, Subsistence Council Coordinator with the Forest Service, at 907-209-7817 or deanna.perry@usda.gov.

Sincerely,



Richard Greg Encelewski
Chair

cc: Federal Subsistence Board
Southcentral Alaska Subsistence Regional Advisory Council Members
DeAnna Perry, Subsistence Council Coordinator, Office of Subsistence Management
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
Pippa Kenner, Acting Policy Coordinator, Office of Subsistence Management
Tom Kron, Statewide Support Division Supervisor, Office of Subsistence Management
Katerina Wessels, Supervisory Program Analyst, Council Coordination Division,
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George Pappas, State Subsistence Liaison and Acting Fisheries Division Supervisor,
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record