

**Kodiak/Aleutians Subsistence Regional Advisory Council**

c/o Office of Subsistence Management

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**MAY 17 2021**

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

Dear Chairman Christianson:

The Kodiak/Aleutians Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit the 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 held via teleconference, on September 2-3, 2020, the Council brought forward the following concerns and recommendations for this report. The Council approved this report at its winter 2021 meeting held via teleconference. 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 Kodiak/Aleutians Region.

**1. Adak Island Caribou Management Plan**

The Council appreciates the response from the Board and looks forward to beginning the process of forming a management plan for Adak Island. The Council encourages the Board to initiate the management plan soon, and to include a member from the Council and a member from the community of Adak into the management plan development group.

In its FY-19 annual report reply, the Board said,

*“As noted by the Council, development of a management plan may allow for more thoughtful management of the species. The Alaska Maritime NWR supports the development of a caribou management plan for Adak that reflects the wishes of various interest groups. Roughly 2/3 of Adak Island is Alaska Maritime NWR and 1/3 is Aleut Corporation land. Development of a plan should involve at a minimum ADF&G, the Aleut Corporation, the City of Adak, and the USFWS. Other interest groups may want to be involved, as well. The Alaska Maritime NWR would be more interested to support opportunistic monitoring of caribou, if a well-designed caribou management plan for Adak Island is developed. The plan should include population objectives that consider the needs of Federally qualified subsistence users, non-local hunters, local community, native wildlife, and natural biodiversity, and a way to manage the herd towards that population objective.*”

*The Board will contact ADF&G through OSM and encourage coordination and initiation of a planning process with the Alaska Maritime NWR, Aleut Corporation, the Council, Adak residents, and other interested parties.”*

The Council looks forward to progress on contacting Federal and State agencies, as well as non-government agencies and other interested parties. Please keep the Council apprised of any development on the Adak caribou management plan.

## **2. Izembek National Wildlife Refuge**

The Council appreciates the hiring of Izembek NWR manager, Ms. Maria Fosado. The manager and staff provide critical resource information to the Council. The reports presented by the Refuge provide the Council with information needed to develop subsistence and resource recommendations.

## **3. Regional Advisory Council Alternate Member**

The Council currently has two vacant seats. The Council depends on members who have knowledge of their region and communities to develop recommendations to the Board on subsistence resource related issues in public meetings. It is important for the Council to have all the seats filled in order to represent the cultural and geographic diversity of the region. Not reappointing the Council incumbents who have served on the Council for several terms and that have reapplied to serve again, has handicapped the effectiveness of the Council in developing informed decisions.

The Council recommends that when the nominations package is submitted to the Secretaries of Interior and Agriculture that the Board will recommend that the Secretaries appoint alternates from a pool of qualified applicants identified by the interagency panel. Designation of alternate members to each of the ten Councils is needed to ensure seats remain filled and communities in the region have adequate representation at Council meetings.

In its FY-19 reply, the Board said,

*“As a result, prior to the charter language change, the seat would have remained vacant throughout an entire year, leaving subsistence regions underrepresented. With the new provision in place, the Board suggests that whenever possible the Council nominations panels identify qualified alternates from the pool of applicants and present names to the Board. After review, the Board might recommend that the Secretaries appoint them as alternate member(s).*

*After the Secretaries appoint an alternate member(s), this member remains “in reserve” and will engage in the Council’s business only if a seat becomes permanently vacant for the reasons stated above. An alternate member cannot replace a sitting Council member during a meeting if that Council member is sick or otherwise unavailable to attend the meeting. Under the new provision, alternate members do not become available until around December 2020, as noted by the Council.”*

## **4. Sea Otter – Endangered Species Act designation**

In prior Council public meetings, the Council has questioned the designation of the northern sea otter population in the Kodiak Archipelago as part of the Southwest Alaska Stock. The Southwest stock is currently considered a population that is threatened.

Sea otter numbers have declined in southwestern Alaska over the past 20 years. Once containing more than half of the world's sea otters, this population segment, which ranges from Kodiak Island through the western Aleutian Islands, has undergone an overall population decline of at least 55–67 percent since the mid-1980s. In 2005, the U.S. Fish and Wildlife Service (Service) listed this distinct population segment as Threatened under the Endangered Species Act.

(<https://www.fws.gov/alaska/pages/marine-mammals/sea-otters>)

In 2005 the Service listed sea otters in southwest Alaska as threatened under the Endangered Species Act (ESA). As a result of this ESA listing, the Service has developed a recovery plan to identify the cause of the decline, monitor population trends, and help recover the sea otter population in southwest Alaska.

In 2009 the Service finalized the designation of critical habitat for the threatened northern sea otter in southwest Alaska. Critical habitat areas contain habitat that is essential to the conservation and recovery of a threatened or endangered species.

([https://www.fws.gov/r7/fisheries/mmm/seaotters/pdf/factsheet\\_wildlife\\_biologue.pdf](https://www.fws.gov/r7/fisheries/mmm/seaotters/pdf/factsheet_wildlife_biologue.pdf))

The Council has the following questions regarding sea otters. How does the Service determine stock identification (SW, PWS, and SE stocks), and the criteria/process for determining population stock designation? What criteria and administrative, genetic, and population size trends were used to designate the Kodiak Island sea otter population a part of the SW population?

Council discussions, and dialogue, with rural residents within the Kodiak Archipelago by Council members, reported that the sea otter population in the area are healthy. Rural residents have concerns on how the sea otters have impacted subsistence shellfish resources caused by the increasing sea otter population.

Additionally the council asked, can the population within the Kodiak Archipelago be reclassified as a separate stock? Stock assessment and habitat assessment within the Kodiak Archipelago should be evaluated to determine if the population is healthy.

The Council is interested in participating in agency sponsored meetings, and other public forums, relating to its knowledge of sea otters within the Kodiak area. The Council is willing to send a delegate to participate in future meetings and to sponsor a member from the Council to attend and participate when funding is available.

## **5. Fisheries Resource Monitoring Program**

The Council would like to express its appreciation for Ms. Robbin La Vine and Mr. Jarred Stone for their assistance at our recent meeting to develop Priority Information Needs (PINs) Working Group volunteer meeting on August 31, 2020.

The Council is impressed with the information the staff assembled and their professional facilitation for our “informal” teleconference to review the “2022 Draft Priority Information Needs for the Southwest region” (Bristol Bay Regional Advisory Council and Kodiak Aleutian Regional Advisory Council).

This was a great assistance in developing our research priorities list and Mr. Keith Ivy, the young intern, who assembled the “backlog information” materials, did a great job as well.

The Council indicated this Fisheries Resource Monitoring Program cycle was an exhausting endeavor and was probably without a doubt, the best prepared and conducted working group planning meeting and review session in which we have participated, in the experience of our Council.

## **6. Food Security**

With the recent COVID-19 pandemic and food production plants shutting down throughout the country, it is important to emphasize the importance of subsistence resources in Alaska. It is uncertain how long the pandemic will continue, along with delays of goods and services caused by the pandemic and its associated affects across Alaska. Food security for subsistence users is important. The Board can continue to support subsistence opportunities by providing subsistence resource access through season extensions and special actions to address food security.

## **7. Closure Reviews**

The Boards policy on closure reviews is to provide transparency to the public regarding the process for addressing Federal closures and provide for periodic review of regulatory closures, and subject to change during the regulatory year.

The Council had seven closure reviews to consider at its fall 2020 meeting and develop its recommendations to the Board. It is important to the Council, that the public has an opportunity to review these closures and the Council seeks their comments regarding affected subsistence activities. The Council deferred all seven closure reviews until its winter 2021 public meeting. The Council requested that the Office of Subsistent Management (OSM) staff present the closure reviews to local State advisory committees and Tribal entities to gather additional public comments in the fall of 2020. The Council will develop its final recommendations to the Board after hearing all public comments on the closures. The Board convened in January 2021 to act on the April 2021 – March 2023 fishery proposals and closure reviews. The Board deferred the Federal fishery closure reviews to the 2023 fishery cycle, in deference to the Council.

At its winter 2021 March meeting, the Council approved a planning team to develop outreach strategies to inform the public, affected by the Federal fishery closure reviews, to inform the public of these closures within the Kodiak/Aleutians region and take testimony and comments. The planning team is composed of three Council members and OSM staff.

## **8. Invasive Species**

The Council recognizes the presence of invasive species in the region and within the State. Invasive species have the potential to invade anadromous streams and lake systems in Alaska affecting the native flora and fauna and disrupting the natural environment. The Sun'aq Tribe of Kodiak reported they have begun investigations of introduced crayfish in the Buskin Lake drainage. The Buskin River currently has crayfish that may compete for habitat used by juvenile salmon, as an example, and potentially feed on salmon eggs or fry.

The Council encourages Federal and State agencies to monitor invasive species in the State. Invasive species affecting the natural environment will also affect subsistence resources, specifically for all salmon. Invasive species should be mitigated to protect the natural resources. Mitigation of invasive species is key to protecting subsistence resources.

The Kodiak/Aleutians 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 Kodiak/Aleutians Region. If you have questions about this report, please contact me via Donald Mike, Subsistence Council Coordinator, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3629, or email at donald\_mike@fws.gov

Sincerely,



Della Trumble  
Chair

cc: Federal Subsistence Board  
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management  
Lisa Maas Grediagin, Wildlife Division Supervisor, Office of Subsistence Management  
George Pappas, State Subsistence Liaison and Acting Fisheries Division Supervisor  
Office of Subsistence Management  
Jonathan Brent Vickers, Anthropology Division Supervisor, Office of Subsistence Management  
Tom Kron, Statewide Support Supervisor, Office of Subsistence Management  
Kodiak/Aleutians Subsistence Regional Advisory Council  
Donald Mike, Subsistence Council Coordinator, 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