

Kodiak/Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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MAY 11, 2020

Mr. Anthony Christianson, Chair
Federal Subsistence Board
c/o 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-2019 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 in Cold Bay, Alaska, on September 26-27, 2019, the Council brought forward the following concerns and recommendations for this report. The Council approved this annual report at its winter 2020 meeting in Kodiak. 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.

At its fall 2019 meeting the Council decided through consensus to resubmit five topics from its FY-2018 annual report to the Board. The Council appreciates the Board replies; however, these items are of continuing concern to the Council. The Council would like to receive additional information on the topics and learn about any new or recent developments on the issues.

1. Request for annual surveys of Adak Island caribou

(Topic #3 in the FY-18 annual report)

The Council requests that the Board support annual surveys of Adak Island caribou and salmon. The last caribou survey for Adak Island was conducted in 2010. Adak Island caribou are an important subsistence resource for Federally qualified subsistence users in the Kodiak/Aleutians Region. Hunting pressure for caribou on Adak Island is high. Updated annual surveys are needed to determine how many caribou remain on Adak Island. The Council also recommends the Board explore the use of drones for conducting these surveys as a possible means to reduce survey costs.

In order to manage the Adak Caribou Herd in a sustainable manner, a management plan is required. The US Fish and Wildlife Service (USFWS), the Alaska Department of Fish and Game (ADF&G), and stakeholders should form a task force that will develop an approach to initiating a management plan for the Adak Caribou Herd, some of which has migrated to Kagalaska Island. The Alaska Maritime National Wildlife Refuge manager suggested that it would be more expeditious if ADF&G were to take the lead on developing a joint plan. To move forward, the Council requests the Board initiate the development process of a management plan for caribou on Adak Island through outreach efforts and correspondence with interested parties.

2. Request to maintain Fisheries Resource Monitoring Program (FRMP) full funding
(Topic #6 in the FY-18 annual report)

The Council requests the continuation of full funding for FRMP. The Council emphasizes the importance of FRMP in providing timely information to Federal land managers regarding the population status of subsistence fisheries resources. This data is essential to the management of fisheries and to meet the nutritional needs of Federally qualified subsistence users.

3. Educational opportunities for Council members
(Topic #1 in the FY-18 annual report)

Under the current training system, the only training provided to the Council is a 2 hour session for newly-appointed Council members prior to the winter meeting. The rare opportunity to attend extensive training at the 2016 All-Council meeting was very welcome. There is a need for continuing education for Council members including, but not limited to:

1. Producing a summary description of the role of the Regional Advisory Councils in making recommendations to the Board;
2. Providing an updated *Regional Advisory Council Operations Manual for Council Members*;
3. Convening a more in-depth orientation for new members than what is currently provided (the two-day training session provided in Anchorage in 2017 is a great example), and;
4. Having the Council Coordinators provide formal training classes for the Council.

Training materials should be appropriate for a variety of learning styles and include the use of web-based (online) and video-based instruction materials.

4. Request for evaluation of the Fisheries Resource Monitoring Program (FRMP) project selection process
(Topic #2 in the FY-18 annual report)

There needs to be a meaningful way for the Council to have its comments and input taken into consideration during the FRMP project selection process. This Council's prior communications with the Board on the topic of McLees Lake do not appear to have been considered by the FRMP technical committee. The Council believes it has a unique role to establish priorities for its

region, as it is not a State or Federal agency representative. The Council understands the present FRMP process is designed to protect the integrity of project selection; however, it ignores the region's needs identified by the Council. The present Technical Review Committee project selection process should not override the Regional Advisory Council's defined research needs for subsistence users in the region. The Council requests that the Board examine this policy or provide some other means to achieve this goal. The Council recommends having a Council member participate in the FRMP project evaluation process as was the practice during the first decade of the FRMP process. The Council requests an evaluation of the FRMP process and presentation of findings to the Council and Board.

The Council at its September 2019 meeting, discussed that Council members be involved in the Technical Review Process when evaluating priority information needs. The Council feels that having Council members involved in the FRMP has not been adequately addressed.

5. Agencies Reports

(Topic #4 in the FY-18 annual report)

The Council appreciates the written reports that agencies produce for its meetings. However, it is easier for the Council to absorb these reports if they are included in the Council meeting book. Council Coordinators begin their outreach to agencies for reports months in advance of the Council meeting. For the fall 2018 Council meeting, extensive outreach began in July 2018. The majority of agencies responded within 24-48 hours. Several agencies did not provide presentation materials until 24, 48, or 72-hours before the meeting. The Council understands that resource management agency staff are conducting work during the field season. However, a lack of advance production of reports does not provide Council members adequate time to review materials prior to the meeting.

6. Izembek and Kodiak National Wildlife Refuges Resource Information Technicians (RIT)

RITs serve as critical interpreters of the Refuge's policies and programs to local communities. Currently, the Izembek National Wildlife Refuge does not have an RIT position, and the Council brought the issue to the Board's attention in its FY-2015 annual report. The Board provided its response to the Council dated August 10, 2016:

"The Board passed your issue on to the U.S. Fish and Wildlife Service, Alaska Region Division of Refuges, which provides this response:

The USFWS agrees that the Refuge Information Technicians (RIT) are valuable members of our Refuge team. As a liaison the RIT's help build a stronger connection between local communities and the Refuge. The USFWS looks forward to continuing to promote the RIT program."

The Kodiak National Wildlife Refuge currently does not have an RIT, the position has been vacant for several years, which is detrimental to building strong relationships between the Refuge and the public. The Council urges USFWS to continue their support for the RIT program,

as it has proven critical to fostering relationships between Refuges and local communities. Having RIT positions at these refuges would help build strong relationships with the public.

7. Izembek and Kodiak National Wildlife Refuges staffing

The Council fully supports maintaining a full staff, including Refuge Managers in the Izembek Refuge office in Cold Bay and the Kodiak Refuge office to meet the priority goals of the refuges. The Izembek Refuge Manager's position has not been filled since last vacated. The Council noted that from 2001-2014 the Kodiak Refuge had a Wildlife/Subsistence Biologist who conducted deer and goat research. This position was never refilled either. It would enhance Refuge operations, if the biologist position was filled.

Staff is an imperative resource to the Council, particularly for caribou issues, which is an important subsistence resource for residents of Akutan, False Pass, King Cove, and Sand Point. Staff provides important biological data on the Unimak Caribou Herd. The surveys and monitoring of the herd provides the Council with important data to develop proposals to change Federal subsistence regulations. The Council encourages the USFWS Regional Director to maintain staffing in the Izembek and Kodiak Refuges. The Council also requests that the refuges continue its dialogue with communities on management and policy issues to keep communities informed of public processes of the refuge mandates.

8. Access and harvest limits of subsistence salmon

Residents of Adak depend on salmon as part of their subsistence lifestyle. Some residents of Adak might have difficulty obtaining access to salmon fishing sites outside of the community since it requires having a skiff. A permit to harvest 25 salmon and 25 per household member is required. Access to fishing sites becomes cost prohibitive when fishers are only allowed 25 salmon and cost of fuel is six dollars a gallon. Most residents are not requesting a permit for 25 salmon, when travel to a fishing site is located four hours away.

The Council supports a household limit of 250 salmon for residents of Cold Bay. Residents of the Alaska Peninsula are permitted 250 salmon per household, similar permit stipulations should be applied to the residents of Adak.

9. Bering Sea Community Conference

During the summer of 2020, the community of Unalaska is hosting the Coastal Communities Forum for all Bering Sea communities and Tribes. The host will extend invitations to all Federal partners to participate, including the Office of Subsistence Management. The invitations to attend will also be extended to the Council members. The Council is seeking funding to attend the conference and/or recommendations of any funding sources that the Council can apply for.

10. Sea Otters impacts on subsistence resources in the region

The Council emphasizes that the impacts of sea otters on subsistence resources in the region, particularly throughout the Kodiak Archipelago, continue to be a concern. The Council

recognizes that marine mammals' management is outside of the Board's authority; however, local communities, Tribes, and the Council believe sea otters are negatively impacting shellfish resources, which do fall under the Board's jurisdiction. Locals are regularly reporting increasing numbers of sea otters, including in areas where sightings were previously rare.

The Council formed a working group to begin a dialogue with impacted communities and user groups, and to look for alternative ways to manage the growing population of sea otters. The working group will need the Board's support and funding to make the working group effective.

11. Request to share National Oceanic and Atmospheric Administration Alaska Fisheries Science Center research findings in the Gulf of Alaska and Bering Sea with all ten Subsistence Regional Advisory Councils

The National Oceanic and Atmospheric Administration (NOAA) Alaska Fisheries Science Center, Ellen Yasumiishi, PhD, Research Fishery Biologist, presented to the Council reports on the agency's completed surveys, sea temperatures, feeding conditions, salmon survival, and implications of a marine heat wave in the Gulf of Alaska, as well as the Bering Sea ecosystem. The presentation was well received by the Council. The Council suggests that the Board recommend presenting this NOAA information to all ten Subsistence Regional Advisory Councils.

12. Regional Advisory Councils Appointments and Vacant Seats

The Council requests clarification on how the alternate appointment process will work to fill vacancies on the Council. The Council currently has two vacant seats; will these be able to be filled with alternates or full members during the 2020 year? Based on information received at the Council's March 2020 meeting, the Kodiak/Aleutians Region currently has no approved/vetted alternate members. Based on the vetting process, it seems the alternates would not be available until around December, 2020. The Council would like to know how many applications were received in the last nomination cycle and how many names were forwarded to the Secretaries of the Interior and Agriculture for appointment.

After reviewing the number of members serving on each of the Councils in 2019 and comparing it with the number of members serving after the latest round of appointments, it becomes evident that each Council membership was effectively reduced (the numbers are listed below for reference). If reduction in membership is being considered for all Councils, the Kodiak/Aleutians Council would like to know the reasons and discuss how this impacts the Council and the subsistence resource users in the region.

Council	number of seats	2019 seated members	2020 seated members
SEARAC	13	13	10
SCRAC	13	11	9
KARAC	10	10	8
BBRAC	10	10	8
YKDRAC	13	11	9
WIRAC	10	9	7

SPRAC	10	9	8
NWARAC	10	8	7
EIRAC	10	9	8
NSRAC	10	7	7

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, with the 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
 Kodiak/Aleutians Subsistence Regional Advisory Council
 Susan Detwiler, Assistant Regional Director, Office of Subsistence Management
 Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
 Suzanne Worker, Acting Subsistence Policy Coordinator,
 Office of Subsistence Management
 Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
 Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management
 Robbin La Vine, Anthropologist, Office of Subsistence Management
 Tom Kron, Acting Council Coordination Division Chief, Office of Subsistence Management
 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