

**Western Interior Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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FEB 16 2022

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 Western Interior 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 teleconference on October 13-14, 2021, the Council identified concerns and recommendations for this report. [The Council approved this annual report at its winter 2022 meeting held February 16-17.] 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 Western Interior Region.

**1. Poor return of Yukon and Kuskokwim River Chinook and Chum Salmon in 2021**

Returns of Chinook and Chum to the Yukon and Kuskokwim Rivers in 2021 was catastrophically low, resulting in no salmon harvest opportunities on the Yukon River and several harvest restrictions on the Kuskokwim River. The Council believes there is a need to broaden Federal, Tribal, and State government participation in rebuilding the in-river stocks on the Yukon and Kuskokwim Rivers, particularly by looking at the Bering Sea and Area M fishery impacts. The Council would like to include National Oceanic and Atmospheric Administration, National Marine Fisheries Service, and the North Pacific Fisheries Management Council in this strategy and requests that fishery managers do a better job of working together and acknowledging that there is a crisis in both river systems and that in some areas, escapement and subsistence harvest goals are not always being met.

**Recommendation:**

The Council recommends that Federal, Tribal, and State managers implement precautionary cooperative management of the Chinook and Chum Salmon fisheries in the Yukon River and as

has been implemented in recent years on the Kuskokwim River. The Council further recommends that all provisions of ANILCA be upheld by the Federal Subsistence Board at all times, including those provisions of requiring that harvest be limited to Federally qualified subsistence users when a resource in federal waters is declined to the point that harvest must be restricted to meet their subsistence needs in the region.

## **2. Concerns about other species utilized by subsistence users as a result of poor salmon returns**

This issue is closely related to the first issue identified by the Council. There needs to be an increased effort to monitor other fish species like whitefish and Sheefish because they are being targeted more due to the Chinook and Chum Salmon collapse. The Council also believes that there is a greater need for terrestrial animals, such as moose, to be monitored as well because subsistence users begin to shifting harvest to other species due to the low salmon stocks. There are wider ramifications for the region as a result of this fishery disaster.

### **Recommendation:**

The Council is requesting increased monitoring of populations of other fish species and terrestrial animals as subsistence users in the region begin to adjust their harvest patterns to compensate for low Chinook and Chum Salmon stocks in the Yukon and Kuskokwim rivers drainages. Increased demand for these other species will necessitate closer assessment of these populations by Federal and State managers.

## **3. Tribal representation on the Fisheries Resource Monitoring Program (FRMP) Technical Review Committee (TRC)**

At its meeting held October 13-14, 2021, the Council discussed at length the need to revise FRMP research to prioritize projects by local Tribes and regional Tribal organizations. The Council believes there needs to be more consultation and involvement with Tribes and that the current FRMP process precludes Tribal input. The Council discussed the need to have a Tribal entity on the TRC so that there is meaningful Tribal involvement in the FRMP decision making process, and the need to include monies for natural resources monitoring in their region in the base funding for State and Federal agencies.

### **Recommendation:**

Pursuant to the intent of ANILCA, Title VIII and cooperative agreements with Alaska Native Organizations as described in ANILCA Section 809, the Council requests that sustainable management of Alaska fish and wildlife populations should be funded through State and Federal base budgets, not through competitive grant programs like the FRMP. Furthermore, the TRC should be expanded to include technical expertise from Alaska Tribal organizations who are best positioned to be able to advance traditional knowledge, research and management integration, as well as employ biologists and anthropologists who should be involved in reviewing FRMP proposals.

#### **4. State violation of ANILCA Title VIII during a Federal closure on the Kuskokwim**

The Council is very concerned about the State of Alaska's violation of ANILCA, Title VIII, on June 28th, 2021, when the Alaska Department of Fish and Game opened gillnet fishing for salmon in Federal waters for all Alaska residents after the Federal in-season manager, in partnership with the Kuskokwim River Intertribal Fish Commission, had closed all salmon fishing with gillnets in Federal waters. This action, if unchallenged, indicates that the Federal subsistence protections, fought for so long and hard by Katie John, no longer exist. The Board and Secretaries of the Interior and Agriculture must take proactive actions to enforce ANILCA, Title VIII.

##### Recommendation:

The Council requests the Board and Secretaries of the Interior and Agriculture take immediate action to enforce the Federal subsistence priority of Title VIII of ANILCA on the Kuskokwim River to prevent future illegal State gillnet openings, like the one that occurred on June 28<sup>th</sup>, 2021. This opening caused confusion for Federally qualified subsistence users in the region, was not justified due to conservation concerns, and went against recommendations of the Kuskokwim River Salmon Management Working Group.

#### **5. Bureau of Land Management Guide Use Permitting for Dall's Sheep**

The Council continues to be very concerned about the impact that guided hunting for Dall's sheep is having on the population of this species in the central Brooks Range. Sheep populations continue to be very low and the Council believes that the continued issuance of guide use permits by the Bureau of Land Management (BLM) is exacerbating this problem. Section 802 of ANILCA states that the utilization of public lands in Alaska is to cause the least adverse impact possible on rural residents who depend upon subsistence uses of resources of such lands, consistent with sound management principles and the conservation of healthy populations of fish and wildlife. The Council would like to see the elimination of any guided hunters on BLM lands until sheep populations are sufficiently recovered.

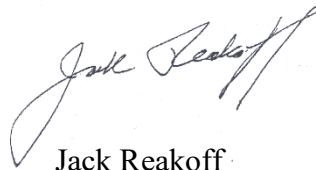
##### Recommendation:

The Council will be writing a letter to the State Director of the BLM stating that we have a crisis situation with the Dall's sheep population in our region as a result of the BLM's special recreation process and that this process needs to be revised to protect the sheep population and provide for a subsistence priority as outlined in ANILCA, Title VIII.

The Western Interior 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 Western Interior Region. If you have any questions regarding this report, please contact me via Karen Deatherage, Subsistence Council Coordinator, Office of Subsistence Management, at karen\_deatherage@fws.gov, or 1-800-478-1456 or 907-351-0083.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Reakoff". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jack Reakoff  
Chair

cc Federal Subsistence Board  
Western Interior Subsistence Regional Advisory Council  
Office of Subsistence Management  
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