

**Southcentral Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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In Reply Refer To:  
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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 Alaska Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2024 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 on October 10-11, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 12-13, 2025, meeting. 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 Southcentral Region.

**1. Reevaluation of the criteria for the Fisheries Resource Monitoring Program**

The Fisheries Resource Monitoring Program (FRMP) was established to identify and provide information needed to sustain subsistence fisheries on Federal public lands for rural Alaskans. The northern ecosystems are changing at an accelerated rate, and the number of subsistence issues and concerns as well as incidents of user conflicts are increasing exponentially. Therefore, the Council strongly believes that the FRMP should evolve to better meet these challenges. The northern ecosystems are changing at the accelerated rate, and the number of subsistence issue and concerns as well as incidents of user conflicts are increasing exponentially. Therefore, the Council strongly believes that the FRMP should evolve to better meet these challenges. The Council would like to see the FRMP updated to better suit the changing climate conditions and federally qualified subsistence users needs. In particular, the FRMP should fund research on marine resources and contaminants.

The Southcentral Region contains more than half of the state's population. The federally qualified subsistence users that call this region home depend upon foods that require a healthy marine environment. This includes shellfish, seaweed, shorebirds and eggs, marine mammals, and marine and anadromous fish. Many of these resources are also utilized by non-federally

qualified users and marine commercial fishing operations. The high population in the urban centers in the region also means continued land development and infrastructure expansion that are occurring to support this population. The Council is concerned about ground and water contaminants from development and industry leaching into the ecosystem and becoming part of the food web. If federally qualified subsistence users from this region cannot trust subsistence foods to be free of contaminants and healthy for regional users to consume, then this is a food security issue, which should be addressed through the FRMP.

The inability to submit projects on most marine and contaminant topics for funding consideration under the FRMP significantly hampers the Southcentral Region – focusing on only freshwater topics limits support for projects of great concern to this region’s subsistence needs

*Recommendation:*

The Council requests the Board direct OSM to review if the current FRMP requirements meet current subsistence users' needs across all regions. If barriers, such as the lack of ability to request funding on marine or contamination topics exist, the Council request the Board examine how these barriers can be removed or modified to better suit the needs of the regions.

**2. Review the effects of the Chitina Subdistrict Personal Use Fishery on subsistence fishing opportunities and Chinook and Sockeye salmon returns**

Ensuring the viability of salmon that return to the Copper River drainage is of utmost concern to this Council. This Council would like to acknowledge that it is important for all Alaskans to be able to harvest food for their families, but these practices should not be done to the detriment of Federally qualified subsistence user needs.

This Council is concerned with the ever-growing Chitina Personal Use Salmon Fishery that is conducted in the Copper River. This concern was highlighted after FP21-10 was submitted, which requested the creation of a federal dip net season near the mouth of the Copper River. This created discord between some Federally qualified subsistence users in the Southcentral region, which is downriver of the personal use fishery, and the Eastern Interior Region, which is upriver of it. Public testimony was heard that a new fishery in the lower river would further reduce the number of salmon available for those Federally qualified subsistence users who reside in the upper portions of the Copper River. Federally qualified subsistence users should not be fighting amongst themselves over allocation of subsistence resources when non-Federally qualified subsistence users are harvesting the bulk of the salmon in the drainage.

*Recommendation:*

The Council would like the Board to be briefed on the growing Chitina Personal Use Salmon Fishery that is conducted on the Copper River and managed by the Alaska Department of Fish and Game (ADF&G). The Council also requests that the Board consider any actions to help mitigate the impacts of this fishery on Federally qualified subsistence users and on the long-term viability of salmon in this river for continued use.

**The remainder of this report is for informational purposes only and the Council does not require a response; however, the issues are significant, and the Board may benefit from this knowledge.**

**3. Concern over acquiring Ceremonial Harvest Permits for Prince William Sound shrimp**

At the Fall 2024 Council meeting, it was brought to the Council's attention that some Tribal members encountered difficulty in navigating the process that would allow them to harvest ceremonial shrimp for an important potlatch in the Prince William Sound. This was concerning to learn. While the Council recognizes that marine waters are not in the jurisdiction of the Federal Subsistence Management Program, the Council would still like to draw this issue to the Board's attention.

**4. Provide information on the process to list Southcentral Region Chinook Salmon as a threatened or endangered species**

The Council has voiced concern over Chinook Salmon returns throughout the entirety of the Southcentral Region. Many Chinook Salmon runs in the region are struggling at best and completely absent in some systems. Chinook Salmon that do return are considerably smaller than historic averages. This is not a new concern for the Council, and while it may be too late to act for some runs, the Council would like to believe that not all hope is lost. The Council would like to receive information on the listing process for species under the Endangered Species Act, as well as the implications listing would have for users in terms of subsistence activities, recreation, and resource development.

A staff member from the National Oceanic and Atmospheric Administration was to attend the Fall 2024 meeting to present on current efforts to have Gulf of Alaska Chinook Salmon listed as a threatened or endangered species but was ultimately unable to attend and present. Efforts are being made to ensure staff will be able to present at the Winter 2025 meeting. If this is not going to happen again, the Council may have additional requests to the Board in the FY-2025 Annual Report.

**5. Ongoing effects of changing environmental conditions impacting this region in relation to ocean resources**

The Council remains interested in how changing environmental conditions are impacting marine food webs, including changes to the distribution and timing of paralytic shellfish poisoning (PSP), as well as what short- and long-term effects ocean acidification have on the marine ecosystem. Marine subsistence resources such as shellfish, salmon, and seaweed are critical to the people that call the Southcentral Alaska region home. Drastic changes to marine food webs have profound impacts on species utilized as subsistence resources and; therefore, on subsistence users.

The Council envisions that the combined effects of the new seasonality of PSP and ocean acidification will be highly detrimental to these food webs and to our ability to meet our subsistence needs. Understanding the impacts of climate change on shellfish and salmon will

allow State and Federal subsistence managers to respond more readily to changing populations. The Council did hear from a lead subject matter expert on these topics during fall 2023 meeting, and we hope to continue to hear from them in the future.

**6. Alarming rate at which the Southcentral Region's subsistence resources are being depleted**

The Council continues to grow concerned about the rate, at which the region's subsistence marine and terrestrial resources are being depleted. Many Council members recall a time when there were enough resources for all, but that no longer seems to be the case. The demand for fish, shellfish, and land mammals is growing. The state has more roads and marine and freshwater docks serving as access points. Additionally, new technologies for boats and off-road vehicles far surpasses the abilities of these vehicles of 40 years ago. Teamed with the ongoing effects of climate change, the result is the depletion of many subsistence resources of great cultural importance, Council members have not just observed these changes through their lifetimes but even within the years they have served on this this Council. The Council is deeply concerned about this trajectory and implications for Federally qualified subsistence users and subsistence resources. The Council will continue to inform the Board on specific examples of concern through the annual report process.

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 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 Nissa Pilcher, Subsistence Council Coordinator, Office of Subsistence Management, at [nissa\\_pilcher@ios.doi.gov](mailto:nissa_pilcher@ios.doi.gov), or 1-800-478-1456, or 891-9054.

Sincerely,

R. Greg Encelewski  
Chair

cc: Federal Subsistence Board  
Southcentral Alaska Subsistence Regional Advisory Council  
Interagency Staff Committee  
Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Gam  
Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of Fish and Game

Administrative Record