

**Seward Peninsula Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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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 Seward Peninsula 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 24 – 25, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its April 1 – 2, 2025, public meeting. The Council wishes to share information and raise a number of concerns dealing with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Seward Peninsula Region.

**1. Youth Engagement in Subsistence Practices and the Federal Subsistence Management Program in the Seward Peninsula Region**

Our Council is fortunate to have many dedicated members with decades of experience advocating for subsistence needs and a wealth of Traditional Knowledge. We recognize; however, that our Council's future depends on the involvement of younger generations in subsistence management and their understanding of ANILCA and the Alaska Native Claims Settlement Act (ANCSA). As such, the Council seeks opportunities to engage younger generations in the Federal Subsistence Management Program (FSMP), to develop and prepare them as future leaders and to reconnect them to practices that may bring each of them a sense of identity.

**Request to the Board**

The Council requests the support of the Board to engage youth in subsistence practices and FSMP in the Seward Peninsula Region. Our Council seeks to replicate the University of Alaska Southeast's "Policy and Procedures Practicum: Understanding the Federal Subsistence Process" in the Seward Peninsula region. This dual enrollment program is conducted in partnership with the U.S. Forest Service (USFS), the Sitka Conservation Society, and Mount

Edgecumbe High School. The USFS has allocated funding in a multi-year partnership agreement, allowing high school students to earn school credit while learning about the regulatory process behind fish and wildlife management on Federal public lands. This program also prepares students to provide public testimony and builds their skills for future participation in public processes. The Council has received the approval of the Sitka Conservation Society to replicate this effort in our region. However, it requires a sponsoring Federal partner and seed funding of \$50,000 to pilot this program for two years. The Council asks the National Park Service (NPS), Bureau of Land Management (BLM), or the U.S. Fish and Wildlife Service (FWS) to consider participating in such efforts. Additionally, the Council understands that this effort requires the support of other organizations in order to be successful and will advocate to receive the support of the Bering Strait School District, the Alaska Conservation Fund, the University of Alaska Fairbanks, and other regional organizations. The Council is eager to discuss this opportunity further with NPS, BLM, and FWS.

## **2. Request to Host Interagency Workshops to Address Long-Standing Issues Negatively Impacting Subsistence Users in the Seward Peninsula Region**

We, the Council members, have spent many years advocating for the protection of subsistence resources through our involvement on multiple councils, boards, or committees across the state and have grown frustrated by the fact that despite our efforts, subsistence users must bear the burden of conservation. We committed our time and energy to our Council with the expectation that our efforts would be meaningful contributions to the management of the renewable resources, on which we depend. Twice a year, our Council meets to learn about trends in resources and provide recommendations on regulatory proposals. However, we feel this process does not affect the critical issues that are impacting federally qualified subsistence users in our region. Salmon populations have plummeted over the past twenty years, but commercial fisheries are still allowed to harvest indiscriminately. Caribou populations continue to decline. It is discouraging to feel that the only legacy that we may leave our grandchildren will be to continue bearing the burden of conservation. The Council believes we are at a point that requires inter-agency dialogue, planning, and collaboration to ensure the sustainability of subsistence resources in Alaska.

### *Request to the Board*

The Federal Subsistence Management Program revolves around building consensus and cooperation among Federal agencies, the State, Tribal governments, and the public. As such, the Board is uniquely positioned to promote increased collaboration and a greater understanding of subsistence issues across the state. The Council requests that the Board agencies provide funding and staff to host workshops and other opportunities for dialogue that bring people together to establish goals, objectives, and strategies to keep these issues from becoming more severe.

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

### **3. Continued Concerns Over the Impacts of Trawling and Commercial Fisheries on Bering Sea Salmon**

The Council continues to be concerned over the long-term negative impacts of the trawl fishery and commercial fishing on Bering Sea salmon and the marine environment. The Council believes these practices contribute to the destruction of the ocean floor, habitat loss detrimental to the health of the marine ecosystem, and the collapse of species necessary for subsistence. Additionally, trawling removes many non-target species from the environment as bycatch, and we are concerned about the cumulative impacts bycatch has on the overall health of the marine ecosystem. Lastly, in a time when climate change has played a significant role in the health of salmon populations and subsistence practices in our region, the Council is particularly concerned about the amount of carbon dioxide released into the water column and the atmosphere due to the disruption of the ocean floor through these practices. The Council believes that understanding the long-term impacts of climate change on salmon should be a priority for the National Oceanic and Atmospheric Administration and the North Pacific Fishery Management Council.

The Council acknowledges that the management of these fisheries is outside of the scope of the Board's authority but believes this issue is of utmost importance to the subsistence users of our region. As such, the Council felt compelled to express our concern by asking the Board to elevate these concerns to the Secretaries of the Interior and Agriculture.

### **4. Concerns About the Impacts of Microplastics and Pollution on the Arctic Marine Environment**

The Council is also concerned about microplastics and pollutants in the marine environment. The Council has observed increased ship traffic and more plastic and other debris in the Bering Sea; thus, we are concerned that increased human activity will further impact fisheries and food webs in the marine environment. Severe storms, flooding, and above-average water levels leads to contaminated runoff from Coastal communities, further exacerbating pollution of the Bering Sea. For instance, the Council identified nutrient-rich runoff from sewage as a likely contributor to eutrophication in coastal waters and chemicals from improperly disposed petroleum products infiltrating waterways. Furthermore, the Council shared other observations on the impacts to the marine environment, stating that more freshwater flowing into coastal waters also changes the composition of the water column, impacting salinity, and; therefore, the distribution of organisms. One Council member stated, “*(with) more rain, you have more saltwater below the surface.*” The Council believes these elements are significant contributors to the declining health of the marine ecosystem and the depletion of subsistence resources such as salmon and marine mammals. The Council stresses the importance of monitoring water quality in the marine environment because of the severe food security concerns and impacts on subsistence.

The Seward Peninsula 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 Seward Peninsula Region.

Chairman Christianson

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If you have any questions regarding this report, please contact me via Gisela Chapa, Subsistence Council Coordinator, Office of Subsistence Management, at [gisela\\_chapa@ios.doi.gov](mailto:gisela_chapa@ios.doi.gov), or 1-800-478-1456 or (907) 310-6129.

Sincerely,  


Louis Green, Jr.  
Chair

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