

**Western Interior Alaska 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 Western Interior 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 2-3, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 25-26, 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 Western Interior Region.

**1. Subsistence Users Continue to Bear the Brunt of Salmon Conservation in the Yukon and Kuskokwim Drainages**

The Council grows increasingly frustrated with Federally and State managed commercial fisheries impacting Federally Qualified Subsistence Users (FQSU) ability meet subsistence needs. Specifically, the North Pacific Fisheries Management Council's (NPFMC) management and regulation of commercial fishing operations during the Bering Sea and Aleutian Island (BSAI) pollock trawl fishery, and the Alaska Department of Fish and Game (ADF&G) and the Board of Fisheries (BOF) management and regulation of commercial fishing operations in the South Alaska Peninsula (Area M) commercial salmon fishery.

In 2024, returns of Chinook and Chum salmon in the Yukon River were yet again catastrophically low, resulting in virtually no subsistence salmon harvest opportunities. The salmon returns on the Kuskokwim River were slightly better but did not allow for subsistence needs to be fully met for either of these species. Yet commercial salmon fishing continued to occur in the marine environment, where salmon bound for the Arctic, Yukon, and Kuskokwim drainages (AYK) were caught and discarded as bycatch in the BSAI fishery, or incidentally caught and subsequently sold in Area M fisheries. While salmon stocks continue to fail to meet

escapement goals in most of the AYK, much less meet FQSU subsistence needs, or meet international treaty obligations in the case of the Yukon River.

The regulation changes to the BSAI fishery the NPFMC initiated to reduce the number of salmon caught and subsequently discarded as bycatch is not a good faith effort, and by no means is a balance of conservation between the BSAI trawl fleet and FQSU. The NPFMC needs to take significant action that will provide actual protection to salmon stocks to allow these stocks to begin rebuilding. This includes modifications to trawl timing, gear modifications, and enforcing the fleet's requirement to not let trawl gear operate on the ocean floor.

The regulation changes that the BOF enacted during their March 2023 meeting to reduce the impact of marine interception of AYK stocks is also not a good faith effort and is also not a balance of conservation between the State managed commercial fishing fleet in Area M and FQSU. The BOF discussion of a very publicly supported regulatory proposal to reduce the amount of time commercial fishermen had to fish during times of known higher AYK bound salmon in this mixed stock fishery was concerning, as the BOF commented that the fleet had started to 'police themselves' and should be allowed to continue to do so without the BOF enacting additional regulations. During the 2023 commercial fishing season in Area M, nine citations were issued to captains and crew members who were observed discarding non-targeted salmon species to circumvent the non-target salmon cap, and in the 2024 season, the number of citations issued "*surged*" \* with "*most [citations] written to fishermen harvesting in closed waters or during a closed period*" \*. Yet these are the fishermen who are volunteering to limit when they fish to allow passage of AYK bound salmon during legal fishing openers. This is the definition of a fox watching the henhouse.

The Federal government is under obligation under ANILCA to prioritize subsistence needs, and the State is under a similar obligation under its state constitution, as well as to manage salmon under sustained yield management. Yet both the Federal and State government are failing to meet these obligations. The NPFMC and the BOF need to take significant action now that will provide actual relief to AYK bound salmon stocks to allow them to begin to recover and rebuild, instead of being caught and sold for profit in the commercial market or dumped over the side of fishing vessels.

Both the Federal and State government are also hindering native salmon stock recovery in a different way. The Federal government by lack of action regarding international hatcheries, and the State government by allowing over release of hatchery salmon into Alaskan waters. The hatchery salmon reduce the amount of food that wild stock salmon can find, reducing their overall fitness. The Department of the Interior (DOI) needs to fully understand the detrimental nature of hatchery releases in the current ocean environment, which other nations release, and how much, Pacific salmon, how many are being released, and where these salmon rear in the marine environment so that discussions may begin with these other nations about the formation of an agreement to severely reduce salmon hatchery production and release. The State needs to also rein in the amount of hatchery releases that are currently permitted. The current practice by

\*Stewart, Carli. "Citations Surge During Bristol Bay Sockeye Season." National Fisherman, 11 July 2024, <https://www.nationalfisherman.com/citations-surge-during-bristol-bay-sockeye-season>. Accessed 13 December 2024.

both other nations and the State is not sustainable to the continuation of healthy wild salmon stocks in the North Pacific and Bering Sea.

Recommendation:

The Council requests that the Board to remind the Federal government and applicable agencies of its ANILCA mandate to prioritize subsistence, and to begin to formulate how an international discussion can start over capping international hatchery production. Additionally, the Council requests that the Board encourages the State to recall its constitutionally mandate to prioritize subsistence and sustained yield.

**2. Continued Concern with the Lack of Data on Regional Non-Salmon Populations**

Due to the continued poor run strength of multiple species of salmon into the Yukon and Kuskokwim rivers, FQSUs continue to rely heavily on nonsalmon species such as whitefish, Northern Pike, and Long Nosed Suckers to meet subsistence needs. Little is known of the population or harvest thresholds for these fish in either system. It is concerning to the Council that the people of the Yukon and Kuskokwim could unintentionally overharvest and damage the fitness of these populations while waiting for salmon runs to improve. The Council has previously voiced this concern and will continue to do so until more progress is made on this topic.

Recommendation:

While the Council will continue to utilize the priority information needs through the Fisheries Resource Monitoring Program (FRMP), the Council would like the Board to review how much research on these species has been funded by the FRMP as the Board formulates a reply to the Council so they are aware of what has, and has not, been done.

**3. Creation of a Yukon and Kuskokwim Fish Commission**

The Council has expressed concern over the lack of salmon available to subsistence users and over the impact of a higher reliance on nonsalmon species in AYK drainages, and concern over commercial marine fisheries managed by both the State and Federal government that harvest salmon bound for the AYK in this, and past Annual Reports. Additionally, the Council has sent individual and/or joint Council letters to the Board, the North Pacific Fishery Management Council, and the ADF&G and the BOF with concerns and requests for action in this time frame as well with little to show for it. The Council believes that the next step to create a Yukon and Kuskokwim Fish Commission so that the subsistence users in these drainages can build a stronger voice with our concerns and our requests, and to share information, ideas, and concerns more readily between the two drainages.

Recommendation:

The Council requests the Office of Subsistence Management and Board to assist with the creation of this commission.

**4. Creation of a Memorandum of Understanding between the Department of Commerce, the DOI, and the Department of Agriculture Concerning Commercial Fishing**

The Council would like a Memorandum of Understanding (MOU) to be created between the DOI, the Department of Agriculture (DOA) and the Department of Commerce (DOC) regarding commercial fishing where AYK bound salmon are caught. As marine commercial fishing continues to occur when FQSU are unable to even put a net in the water, the subsistence priority outlined in ANILCA is not being adhered to. This continued lack of action by the Federal government is jeopardizing FQSU ability to harvest wild salmon that have been utilized for millennia. This lack of action is also jeopardizing the sustainability of salmon culture in these drainages as with the lack of salmon there is no opportunity to pass along knowledge of where and how to fish for salmon, and when and how to process salmon to the next generation - subsistence fishing is so much more than how many fish were harvested. Also in jeopardy is the future viability of these salmon stocks for future generation. ANILCA is not an act that only applies to the DOI and DOA, but all Federal agencies, and all federal agencies should recognize this mandated subsistence priority.

Recommendation:

The Council wishes the Board to request that the Secretary of DOI, DOA, and DOC gather to discuss establishing a MOU concerning the protection of salmon bound for the AYK.

**5. Western Bound Salmon Genetic Information Collection and Availability**

There is an imperative need for increased genetic monitoring for all commercial fisheries in the State and Federally managed marine waters of Alaska where salmon stocks headed for the AYK are caught. This should be done for both where salmon are targeted intentionally, such as in mixed stock intercept fisheries like what occurs in Area M, or unintentionally, such as in the BSAI fishery. These fleets are harvesting AYK bound salmon in a variety of methods and with different intentions, but the result is less of these salmon being able to return to their natal streams to meet escapement, much less be available for FQSU needs.

This information should then be compiled and made easily available to the public. While the Council acknowledges that these fisheries are managed by both State and Federal entities, they both need to be aware of what the other is doing so that they understand the full impact of their actions on Western bound salmon stocks. Current management by both means that essentially the right hand is not talking to the left. The Council also acknowledges that genetic monitoring is currently conducted by both entities, but finding the results in multiple different locations is difficult for the public.

Recommendation:

The Council will direct their Coordinator to continue to pursue having reports on this topic at upcoming Council meetings. The Council would like the Board to encourage a collaborative database where genetic information from marine commercial fisheries can be stored for review, and to have this database available for the public in locatable and understandable fashion.

**6. Concern with Transporter Operating in the Innoko Wildlife Refuge**

The Council would like to draw the Boards attention to repeated concerns expressed at the Council's fall 2023, winter 2024, and fall 2024 meetings over activities of nonlocal hunters that

are utilizing a transporter operating out of McGrath. This transporter is relatively new business owner in McGrath and is taking clients into the Innoko National Wildlife Refuge (INWR). A previous transporter had operated in this area, but did so on a much smaller, more sustainable scale that the community didn't not have concerns over. This current season it was reported to this Council that 100 clients were taken out by this one outfit.

While the INWR is only 40 nautical miles from McGrath, the Kuskokwim Mountains lay between them, and any weather event slows down the retrieval of moose and hunters from the field. During the fall hunting season, bad weather events are typical in this part of Alaska. In 2023 and 2024, the weather was bad long enough that to the extent that nonresident family members were reaching out to McGrath residents to assist in retrieving their loved ones from the field as the transporter was unable to retrieve hunters via plane. This delay caused meat to be in the field longer than anticipated with individuals who were unaware or unable to take proper care of it. When the weather did lift, all the hunters and their harvested meat returned to McGrath in a large influx. Limited space was available to properly store the influx of meat, and only one commercial meat processor in the community to assist in processing. Attempts were made to distribute some of the meat in the community, but most of it was not fit for dog teams by the time these efforts were made. Much of the meat ended up at the McGrath dump to be disposed of by the community, taxing McGrath's resources and angering community members to see such waste especially for those individuals who were unable to harvest a moose in the fall.

*Recommendation:*

The Council was pleased to have Mr. Karlin Itchoak, US Fish and Wildlife Service (FWS) Assistant Director of Refuges, attend the fall meeting in Galena to speak to this concern. Additionally, the Council was glad to hear that the transporter in question is being investigated by federal wildlife agents, but it is unclear at this time if any charges resulted in this investigation, or if the transporter will be issued permits to operate in the INWR in the future. The Council requests that the Board direct the FWS to report to the Council the outcome of this investigation, as well as what steps are being done to ensure that these series of events does not continue to occur regardless of the end result of the investigation.

**7. Continued Efforts to Finalize the Council's Sheep Management Strategy Guidelines**

The Council continues to have concerns over reopening Federal public lands in Unit 24A and a portion of Unit 26B to sheep hunting. With the approval of Wildlife Special Action WSA22-02, the Board temporarily closed these Federal lands to all users through the wildlife regulatory year 2023–2024. This closure was enacted due to conservation concerns over the sheep population in these units, and the original special action request was submitted by this Council. The Council then submitted Wildlife Proposal WP24-26 to place the actions initiated by WSA22-02 into regulation, which is set to sunset in June of 2026. As previously noted, the Council would like to establish a management framework for when these units reopen to sheep hunting and wishes to establish these parameters in advance. For this reason, the Council drafted the *Dall Sheep Management Strategy Guidelines* (Enclosed). The Council has requested applicable Federal land managers review this document before it is submitted through the Annual Report Process to the Board during the upcoming wildlife regulatory cycle. The Gates of the Arctic Subsistence Resource Commission (GAAR SRC) is assisting in this endeavor. They requested Gates of the

Arctic National Park staff to evaluate and prepare comments on this document for the spring 2025 GAAR SRC meeting. The Council feels that the region should utilize scientific data to better understand the status of Dall Sheep and assist in the recovery of this species.

Recommendation:

The Council requests that OSM use the *Dall Sheep Management Strategy* as a guideline while drafting future analyses for relevant proposals. The Council also asks OSM to distribute the strategy to relevant agencies when applicable. Additionally, the Council requests that the Board approve this plan and direct relevant agencies to review and follow this management strategy when sheep is discussed and management decisions are made.

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

**8. Liberalization of Central Arctic Caribou's Harvest Limit Implications to FQSUs**

The Council is highly concerned over the recent liberalization of the harvest limit for caribou in Unit 26B at the March 2024 Alaska Board of Game meeting. At this meeting, the harvest limit in 26B, which is where the Central Arctic Caribou Herd migrates through, was changed from 4 bulls to 5 caribou for residents, and from 1 bull to 2 bulls for nonresidents. Currently, many of the other caribou herds in Alaska are in a decline, such as the Nelchina, Fortymile, and Western Arctic, and the harvest limits and seasons have been adjusted accordingly. This liberalization will result in greater hunting pressure on this herd by non-Federally qualified subsistence users, which will impact FQSU and communities that this herd migrates close to. Due to this change, the Council wishes to inform the Board not only of our concern, but also to prepare the Board for the potential of regulatory change requests directed at federal lands within the migration pattern of this herd.

The Western Interior 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 Western Interior 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 (907) 891-9054.

Sincerely,



Jack Reakoff  
Chair

Enclosure: Topic 7: Dall Sheep Management Strategy Guidelines

cc: Federal Subsistence Board

Western Interior Alaska Subsistence Regional Advisory Council

Interagency Staff Committee

Office of Subsistence Management

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

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Administrative Record