



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



In Reply Refer To:
OSM.A25011

Rebecca Skinner, Chair
Kodiak/Aleutians Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Skinner:

This letter responds to the Kodiak/Aleutians Subsistence Regional Advisory Council's (Council) Fiscal Year 2024 Annual Report. The Federal Subsistence Board (Board) appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

1. Need for Online Access to Federal Subsistence Harvest Permits

The Council previously shared concerns about the time and difficulty involved in obtaining Federal subsistence harvest permits in our region. We were happy to hear about plans to develop an online permit application system and stress the importance of implementing that system quickly (within two years) to improve accessibility and efficiency for our rural residents. The current system requires obtaining permits in person or by mail and poses challenges in our region, especially for our remote rural communities. We also stress the importance of ensuring that online access works effectively for remote areas with limited internet connectivity and bandwidth.

Response:

We agree easy access to Federal subsistence permits is important. In 2024, the Office of Subsistence Management (OSM) initiated the modernization of the Federal subsistence permitting application. Part of this modernization is to make permits more readily available to users through an option to obtain permits via an online portal. This effort is still in progress and easier options to obtain permits should soon be available. Please check with your local Federal

land management office for options to obtain permits while the Program works toward an online option.

2. Lack of Fisheries Research Monitoring Program (FRMP) Funding for Weir Projects

The Council is grateful for the previous FRMP funding supporting the McLees River and Buskin River weirs. However, the Council is deeply concerned about the loss of FRMP funding in 2024/2025, particularly for the McLees River weir. This lack of funding prevented the weir from operating and resulted in loss of essential salmon escapement data to support effective management of Unalaska salmon and subsistence opportunity for Unalaska residents. The Council emphasizes the need to improve communication about FRMP funding availability with Councils, communities, and users. Furthermore, the Council urges the Board to advocate for greater Regional Advisory Council involvement in the FRMP application review and evaluation process. Currently, our Council's involvement occurs very late in the process and does not provide meaningful opportunity to provide input on projects during the scoring phase. Providing the Council with earlier and more meaningful involvement would help ensure the importance of community projects is effectively communicated and considered during the review process.

Response:

We share your concern regarding the lack of funding for critical projects like the McLees and Buskin River weirs during the 2024 FRMP cycle. We recognize the vital role these weirs play in providing real-time escapement data, which support sustainable salmon management and protect subsistence harvest opportunities for Unalaska and Kodiak residents.

The absence of new project funding in the 2024 cycle reflects a confluence of factors. First, a strategic decision was made in 2022 to fully fund all viable projects. There was enough money to do this because of cost savings from virtual Council meetings due to Covid-19 and staffing vacancies. Two years later, in 2024, there was an ongoing commitment to multi-year funding obligations for those projects. Next, OSM's operational expenses have increased since 2022, and its budget did not grow proportionately to cover both ongoing and new project needs. Lastly, funding for the required modernization of the subsistence permit database system also impacted OSM's budget. Despite these constraints, the Board remains deeply committed to ensuring that high-priority research and monitoring efforts continue to be supported in future cycles.

Current legal frameworks such as the Federal Advisory Committee Act limit direct Council participation in the Technical Review Committee (TRC). Councils play a crucial role at two key stages: the development of Priority Information Needs (PINs), and formal recommendations on proposed projects. These points of Council input significantly influence the scope of project proposals received, and which projects are funded. We encourage the Council to leverage these opportunities to share how proposals serve community needs, address subsistence resource

concerns, and fill critical information gaps. By providing specific, constructive input, Councils can help ensure that research proposals are aligned with local priorities.

3. Dedicated Funding for Weirs

In addition to our recommendations for the existing FRMP funding, the Council requests the Board create a special fund or funding pool for weir projects on a 5- or 10-year basis; perhaps this funding could be coming from FRMP or completely outside of FRMP if possible. While this pool might be funded by multiple sources and agencies, the Council proposes the Board take the lead on this request. Once the funding pool is set up, then the Council requests that the Board then evaluate each prospective project applied for funding through this special fund (including costs), then prioritize these projects, like with the FRMP process.

Response:

We agree that continuity in data collection is critical to monitoring population trends, understanding stock dynamics, and informing adaptive management. However, under the current statutory authority, we do not have the ability to establish new funding streams independently. FRMP has been used to answer specific research questions and for inventory and monitoring, such as weir projects. We are committed to strengthening and modernizing FRMP to meet evolving research needs, including long-term biological monitoring vital to subsistence users and resource managers.

We encourage the Council to collaborate with Federal, State, and academic partners to explore alternative funding avenues such as cooperative agreements, multi-agency grants, or tribal partnerships that could support long-term research needs while maintaining scientific rigor and community relevance.

4. Lack of Law Enforcement Officers for Monitoring and Enforcing Subsistence, Sport, and Commercial Fishing Violations

Our Council previously reported our concerns about the lack of enforcement presence and operation in the Kodiak/Aleutian Region, including both Federal and State lands and waters. Our Council continues to receive increasing reports of concerning subsistence and sport activities, especially along the Unalaska, Alaska Peninsula, and Kodiak Road systems. Enforcement is vital for monitoring and enforcing sport, subsistence, and commercial fishing regulations. We believe a coordinated effort among State, Federal, local, and tribal entities is essential for effective enforcement and recommend dedicating a coordinator to facilitate collaboration and communication among these entities with the goal of increasing enforcement capacity and effectiveness. While enforcement is clearly outside the direct purview of the Board, because this issue is so important to continued access to subsistence, we ask that the Board take the lead on championing and coordinating this effort.

Response:

As your Council has noted, enforcement is outside of the direct purview of the Board. Because of this we reached out to the U.S. Fish and Wildlife Service to learn more about their current enforcement presence and operation in your region. They noted that State and Federal officers rely on the public to report violations in addition to law enforcement patrols. They pointed out that the [Federal Subsistence Management Regulations for the Harvest of Fish and Shellfish on Federal public waters](#) has directions on how to report violations.

An enforcement update from the National Wildlife Refuges (NWR) includes the following:

- Izembek NWR does not have a Law Enforcement Officer (LEO) stationed on-site; however, an officer has been assigned to provide law enforcement support and is based out of King Salmon. Additionally, Izembek NWR maintains communication with Alaska Wildlife Troopers.
- Kodiak NWR no longer has a LEO stationed on Kodiak; they are based out of Kenai NWR.
- Alaska Maritime NWR, as was shared in 2022, does not have a LEO. All response will be out of officers from Kenai NWR. Timely reporting of incidents could provide better response opportunities for LEOs.

We recommend your Council invite Refuge managers, Federal fisheries managers, and the State to your meetings to learn more about their fisheries management and enforcement operations and to discuss concerns related to subsistence and sport violations in your region.

5. Challenges in Ensuring Subsistence Access to Resources Arising from Fragmented Management Approaches

Our Council once again notes that State and Federal agencies often operate in silos, with very different management structures, perspectives, and mandates. For example, the fragmented jurisdiction over salmon management between the Federal Subsistence Board, State authorities, and National Oceanic and Atmospheric Administration Fisheries creates significant challenges. This makes it difficult to manage and ensure subsistence access to resources and creates very high frustration with subsistence users who have to navigate this fractured system. A coordinated approach is crucial for effective management and subsistence access. We strongly encourage the Board to look for opportunities to bridge these divisions and improve coordination whenever possible.

Response:

Our delegated authority from the Secretaries is limited to “...administering the subsistence taking and uses of fish and wildlife on public lands and the related promulgation and signature authority for regulations...” (36 CFR 242.10(a)). As you mention, different agencies have different mandates, often specified in statute, that can only be changed by the relevant legislative bodies. The Board’s authority, powers, and duties do not extend to lobbying Congress to change the

statutes that it is charged with administering. Regardless, we are committed to providing a subsistence priority as outlined in the Alaska National Interest Lands Conservation Act, Title VIII.

Per mandate in the Executive Order 14153 “Unleashing Alaska’s Extraordinary Resource Potential”, Section xxii, we direct OSM and the Councils to work towards consistency and alignment between State and Federal hunting and fishing regulations, where feasible. OSM is currently engaged with the Alaska Department of Fish and Game to establish a tracking system for new regulations adopted by the Alaska Boards of Fisheries and Game and the Federal Subsistence Board. The goal is to identify if the new regulations differ and can be made consistent by proposing a recommended fix to the relevant Regional Advisory Council. As those instances are identified, Councils can then help to align the regulations by submitting proposals accordingly.

To affect change outside of Federal subsistence jurisdiction, one needs to engage with the appropriate decision-making bodies. For example, during winter the 2025 Council meeting cycle the North Pacific Fishery Management Council (NPFMC) conducted three evening outreach and engagement sessions on Chum Salmon bycatch management in the Bering Sea in conjunction with the Eastern Interior, Yukon-Kuskokwim Delta, and Western Interior Councils. We encourage all Councils to participate in such decision-making processes as the Alaska Board of Fisheries, Alaska Board of Game, and the NPFMC and invite representatives of these bodies to participate and engage at your meetings.

6. Importance of FRMP Funding for Statewide Salmon Research Projects

The Council encourages the Board to facilitate and promote FRMP salmon research projects at a statewide level in addition to granting salmon research projects by region. Chinook Salmon is struggling across the state, Chum Salmon are in crisis in the north, Coho Salmon across the Gulf of Alaska are showing signs of trouble. The Council believes that focusing more resources on statewide salmon research would better reflect how salmon populations operate and align with the struggles we are observing, rather than continuing to only fund projects at a fragmented regional level.

Response:

This topic has been raised by other Councils as well. As salmon face a confluence of stressors, ranging from oceanic changes to freshwater habitat degradation and interspecies competition, region specific research may not be sufficient to understand or address these challenges.

Currently, the FRMP is organized into six regions with an additional multi-region category for projects that transcend regional boundaries. This multi-region framework is specifically designed to accommodate the type of cross-ecosystem or species-wide research that the Council is advocating. We commend the Council’s past efforts in shaping priority information needs (PINs) within this framework and encourage continued engagement to ensure statewide research

needs are emphasized.

Other Annual Report Topics for Information Purposes Only

The Board thanks the Council for sharing information in your FY-2024 Annual Report on another issue significant to your region and subsistence users: (7) importance of identifying funding to eradicate invasive Signal Crayfish in the Buskin River system and, specifically, in Buskin Lake.

We appreciate and value the traditional knowledge, observations, and expertise you share. With this information, we are better prepared to make informed decisions.

In closing, we want to thank you and your Council for your continued involvement in the Federal Subsistence Management Program and the work you do on behalf of federally qualified subsistence users. We appreciate your efforts and are confident that federally qualified subsistence users of the Kodiak/Aleutians Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

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