



Federal Subsistence Board

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



In Reply Refer To:
OSM.F26027

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 2025 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to consider these reports. The 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. Fisheries Research and Weir Funding

"The Council expressed concern over funding inconsistency for fisheries research and weir projects, as well as the lack of communication regarding funding status decisions. A Council member noted that the McLees Lake Weir has been inactive for two years and funding to support its continued operation has not yet been secured on a consistent, long-term basis. Council members are frequently asked by community members for project updates but lack clear points of contact for information access during the funding process. Council updates are not available until decisions are publicly announced. Acknowledging that funding fluctuations present challenges for Fisheries Resource Monitoring Program (FRMP) staff, the Council emphasized the need for improved communication and timely notifications for Council members serving as community liaisons, particularly when unusual changes or lapses in funding occur. The Council recommended continued prioritization of weir projects and consideration of regular funding status updates or a designated FRMP staff point of contact to ensure continuity of critical fisheries research and population monitoring."

Response:

The Board shares Council concern regarding insufficient funding for sustainable subsistence salmon management in the Southwest Alaska region and all FRMP geographic regions in Alaska. Inconsistent FRMP funding levels and delays in the Congressional budget process influence program administration and create uncertainty for partners who rely on this support to maintain subsistence opportunities in rural Alaska. While funding levels and timelines remain outside our control, we do retain some authority over project solicitation, selection, and process communication.

Regional Advisory Councils collaborate within their regions to identify information gaps before each funding cycle. These Priority Information Needs (PINs) guide proposal development and their number and scope have varied over time based on Council direction. Councils may collaboratively refine their PINs to address a specific information need rather than a specific project, ensuring they identify the biological or management concern to be addressed (e.g., monitoring Sockeye Salmon escapement to the Buskin River) rather than prescribing a particular method or project.

FRMP communications and timelines have evolved over the life of the program. Historically, budgets were finalized ahead of winter Board meetings, allowing for final project funding updates at winter Council meetings. However, recent funding cycles have seen delays in these updates due largely to lapses in government appropriations and continuing resolutions (CRs). New projects can't be funded under a CR and must wait until the budget is passed. Although the Fiscal Year 2025 Notice of Funding Opportunity (NOFO) included a February 28, 2026 deadline for project selections, notifications to all applicants were issued March 31, 2026. While OSM cannot control or guarantee final project funding release dates and notification letters, OSM can commit to providing proponents with budget updates and overviews of proposal merit review outcomes. Future FRMP NOFOs will be updated to reflect this new commitment, and the Board appreciates the Council's feedback on improving the process. Additional communication opportunities are always welcomed and available upon Council request. Please contact Anna Senecal, OSM Fisheries Biologist, (anna_senecal@ios.doi.gov) with questions.

2. Wildlife Population Studies

“Similar to fisheries, Council members highlighted ongoing information gaps and challenges in wildlife population monitoring across the region. Incomplete surveys over multiple years for several species such as caribou and migratory birds have hindered accurate assessment of population trends. These gaps are often due to logistical constraints, such as limited availability of airplanes, pilots, and other resources needed by refuge staff to conduct surveys. The Council emphasized that reliable population data are essential for understanding the status of key species and for informing management decisions that support subsistence needs. Members noted that prior commitments from USFWS to prioritize surveys at Izembek National Wildlife Refuge had not consistently been fulfilled, leaving important monitoring incomplete. The Council recommended ensuring that refuges be adequately resourced, staffed, and supported to carry out

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consistent and comprehensive wildlife surveys necessary for effective management of sustainable subsistence uses throughout the region.”

Response:

The Board understands the significance of the Council’s concerns regarding gaps in wildlife population monitoring and the challenges these gaps create for informed subsistence management. Reliable, long-term data are essential for understanding population trends, especially for key species such as caribou and migratory birds. We support the Council’s recommendation that National Wildlife Refuges in Alaska be adequately resourced, staffed, and supported to carry out consistent and comprehensive wildlife surveys necessary for effective management of sustainable subsistence uses.

The Board communicated your concerns to the U.S. Fish and Wildlife Service (USFWS) and received the following response:

“USFWS recognizes the importance of long-term monitoring and values providing this information as a steward of resources and a committed partner. Therefore, they will make every effort to continue to provide consistent, high-quality wildlife population data as their fiscal resources and capacity allow. As staffing transitions occur, there are ongoing efforts to ensure adequate staffing within the hiring opportunities that are available to them.”

The Board acknowledges the Council’s concerns about incomplete surveys in recent years, including at Izembek National Wildlife Refuge. While the Board does not have authority over the development of the annual appropriations for the Office of Subsistence Management, the Council can convey its concerns to the Secretaries of the Interior and Agriculture through a formal letter transmitted via the Board. We also encourage coordination with other Regional Advisory Councils that have expressed similar concerns, as a joint-Council approach may further emphasize the statewide importance of this issue.

3. Enforcement Capacity

“Council members expressed ongoing concerns about limited enforcement capacity in the region. Given constraints, they inquired as to whether refuge and agency staff received law enforcement cross-training or instead relied solely on a single officer. Members noted past examples of effective cross-agency coordination, including support from local police and the use of tools like remote cameras, but emphasized that such efforts had been inconsistent. The Council reiterated that inadequate and inconsistent enforcement continues to hinder subsistence users. Members recommended improving refuge staffing, cross-training, and coordination with state and local partners to ensure more reliable enforcement in support of subsistence needs.”

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Response:

The Board appreciates the Council's continued attention to enforcement challenges in the region. We understand the Council's concerns about limited and inconsistent enforcement presence, the reliance on a small number of officers, and the need for stronger cross-agency coordination to support subsistence users. Most of the Councils have expressed similar concerns.

The USFWS currently has 12 Fish and Wildlife Officers (FWOs) responsible for enforcing regulations across 78 million acres of USFWS lands in Alaska. Currently, the USFWS does not have the budget to hire additional officers. Despite these constraints, the agency is working hard to maximize its enforcement presence and to strengthen coordination with partners whenever possible.

To address the Council's concerns about cross-agency coordination, we want to assure you that the USFWS continues to make a concerted effort to work with other enforcement entities. Recently, the USFWS hosted a multi-agency Southwest Alaska Land Management enforcement meeting at the Kenai National Wildlife Refuge. Representatives from the Alaska Wildlife Troopers, Bureau of Land Management, U.S. Forest Service, Bureau of Indian Affairs, National Park Service, National Oceanic Atmospheric Administration, Alaska State Parks, and the Alaska Department of Fish and Game participated. During this day-long meeting, agencies discussed new State and Federal regulations and planned joint patrol efforts. The USFWS is also coordinating closely with OSM, as it has in years past.

The Board encourages subsistence users to report violations promptly to FWOs and to gather as much information as possible, such as photographs, number of individuals involved, dates and times, boat or aircraft descriptions, aircraft identification numbers, and specific locations. This information greatly improves officers' ability to respond effectively.

Regarding staffing at the Kodiak National Wildlife Refuge, the USFWS acknowledges recent shortages due to retirements and other factors. The agency is actively pursuing hiring solutions to fill both seasonal and permanent positions when available.

The Board recognizes that Alaska's vast geography and limited enforcement staffing create real challenges for consistent field presence. We appreciate the Council's recommendations to improve refuge staffing, expand cross-training, and strengthen coordination with State and local partners. These remain shared priorities, and we will continue working with our agency partners to enhance enforcement capacity in support of subsistence needs.

4. Mortensens Sockeye Salmon Returns and Subsistence Access

"Council members noted that Mortensens Lagoon Sockeye Salmon returns remain well below levels observed eight to ten years ago. While there was a slight increase this year, the overall abundance is still much reduced. The impacts of these low returns are expected to be felt more acutely following the closure of the King Cove processing plant. When the processor was

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operating, community members were often able to meet subsistence needs through participation in the commercial fishery. With that option no longer available, residents may need to rely more heavily on direct subsistence harvests at Mortensens, potentially increasing pressure on that fishery. The Council recommended that the Board consider this issue as part of regional resource assessments and subsistence planning, noting that commercial catch declines can reduce the amount of fish available to households in our region. This also affects subsistence fishing that takes place during the commercial season, when residents often rely on commercial openings to meet household needs.”

Response:

Thank you for sharing this change in how people may access their harvest of subsistence salmon at Mortensens Lagoon considering the closure of the King Cove plant. The Board suggests the Council continue to advocate for research and monitoring returns of Sockeye Salmon at Mortensens Lagoon. There is currently a FRMP Priority Information Need (PIN) for this topic soliciting proposals and the Council can encourage agencies and organizations to apply for funding. Additionally, we recommend the Council invite the USFWS delegated in-season fisheries manager to your Council meeting to discuss subsistence planning and the changing reliance on direct subsistence harvests at Mortensens Lagoon. Additional conversations could also include the Alaska Department of Fish and Game to learn more about the land status of Mortensens so that all appropriate management agencies are included in the discussion.

The Board also thanks the Council for sharing information in your FY-2025 Annual Report on another issue significant to the Council—declining emperor goose, brant, and cackling goose populations and limited harvest opportunities due to conservation measures.

We recognize that you are uniquely positioned to offer first alerts to changing conditions and important trends that impact subsistence in your region. The Board appreciates and values the traditional knowledge, observations, and expertise you share. We make informed decisions thanks to the knowledge that you provide.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts. Federally qualified subsistence users of the Kodiak/Aleutians Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

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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
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

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