

Yukon-Kuskokwim Delta 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 Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2021 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 via teleconference on October 6-8, 2021, the Council identified concerns and recommendations for this report. The Council approved this Annual Report at its March 1-3, 2022, 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 Yukon-Kuskokwim Delta Region.

1. Donlin Gold Mine – Impacts to subsistence resources

The Council is concerned about impacts to subsistence resources from the development of the Donlin Gold Mine and barging of mining materials, fuel, and chemicals on the Kuskokwim River. The Kuskokwim River is the lifeblood of subsistence and source of drinking water for many communities in the Yukon-Kuskokwim Delta. The connectivity to the river is everything – if we lose our fish, our salmon, we will lose our entire way of life. The Council is concerned about direct impacts of mining and barging activities to subsistence fish and wildlife and their habitats. We are concerned about contaminants affecting the health of essential subsistence foods and, subsequently, the health of everyone in the region that depend on them.

The Council has expressed concerns in previous Annual Reports about the likely impacts to subsistence as reported in the Donlin Gold Project Final EIS ANILCA Section 810 analysis (enclosure), which indicates the mine as proposed would “may significantly restrict” subsistence for every community in the vicinity and downriver of the mine – from Crooked Creek to the mouth of the Kuskokwim River. The Council also has very serious concerns about the proposed

number of daily barges on the Kuskokwim River required to support the Donlin mine development and operations. Opportunity for subsistence fishing on the Kuskokwim is already limited for Chinook Salmon conservation measures. Greatly increased barge traffic, up to 200 percent with at least several barges heading upriver and downriver every day during open water on the river from break up to freeze up, June 1 to October 1st would only add to fisheries management challenges and interfere directly with subsistence fishing opportunity. Subsistence fishers will have to pull drift nets and move out of the way of barges. The large and long lasting wake of large barges can also dislodge set nets and cause bank erosion thus impacting fishcamps directly.

Additionally, the Council is gravely concerned about direct impacts on subsistence fisheries and resources from barge accidents spilling diesel fuel or other cargo, such as the cyanide that will be shipped in to process gold at the mine site. Sensitive fish habitat and out migrating salmon smolts may also be negatively impacted by constant prop wash of large barges. Some critical spawning areas may be destroyed by the near constant large barge traffic, such as the shallow water gravel bed below Kalskag that is known as the primary Rainbow smelt spawning habitat. Communities will be at a direct risk of losing this highly valued subsistence resource – Rainbow smelt are some of the most abundant fresh subsistence fish harvested in the spring by communities all along the Kuskokwim River as they migrate upriver to spawn. All of this would occur within the Federal waters of the Yukon-Delta National Wildlife Refuge.

The Council would like more information on federal subsistence protections that can be taken to address impacts to subsistence identified in the enclosed in the Donlin Gold Project Final EIS ANILCA Section 810 analysis. The Council seeks to ensure subsistence priority and continuation of subsistence uses in the case of industrial activities such as the planned barge activities would directly harm subsistence resources or displace subsistence users from traditional fishing areas and activities.

2. Whitefish research request – Important subsistence whitefish in decline

The Council is concerned about observed decline in subsistence whitefish species both on the Yukon and Kuskokwim rivers. Council members and other local community members have observed smaller size and abundance of many of the whitefish species that are so important to subsistence. Now, more than ever whitefish are critical subsistence foods and the only fish to eat when the salmon fishing is restricted or closed due to the Chinook and Chum salmon population crash. The Council is concerned that the health and population of the whitefish species should also be monitored to ensure its continued viability for the future as well.

3. Sockeye Salmon research request – Does Sockeye Salmon abundance effect other species?

Sockeye (Red) Salmon populations have been increasing on the Kuskokwim River in recent years. The Council is very grateful for the abundance of this subsistence salmon species but wonders if its increased population impacts other salmon such as Chinook and Chum. The

Council is particularly interested to know if Sockeye Salmon affect the spawning grounds of other salmon species or outcompete other juvenile salmon for resources. Additionally, the Council is interested to learn more about whether there are any concerns about the continuing viability of the Sockeye Salmon if it increases so much to exceed carrying capacity in the available spawning and rearing habitat.

4. North Pacific Fisheries Management Council – Request to lower salmon bycatch

The Council is concerned about Bering Sea commercial trawl fisheries and high rates of Chinook and Chum Salmon bycatch that is still occurring even though the subsistence fisheries have been restricted throughout western Alaska and completely closed on the Yukon River and coast. The Council has requested that the North Pacific Fisheries Management Council reduce the bycatch cap for both Chinook and Chum Salmon to 16,000 for each species. The Council has written several letters addressing this in detail but also wants to put this on the record in our Annual Report to the Board.

Subsistence salmon needs are not being met; hundreds of Alaskans in subsistence communities are going hungry this winter due to closures to salmon fishing in order to meet escapement goals. Salmon is our life and livelihood. We cannot survive without it. There is no subsistence priority being protected in river if salmon are being caught by the thousands in the Bering Sea commercial fisheries. If subsistence fishing is restricted, then all commercial fisheries that intercept salmon must also be restricted. We request the Board engage on this issue with the North Pacific Fisheries Management Council to reduce salmon bycatch in the Bering Sea commercial fisheries in support of our subsistence salmon needs and continuation of subsistence on the Yukon and Kuskokwim rivers.

5. Mulchatna Caribou Herd decline – Conservation measures

The Council is concerned about the dramatic decline of the Mulchatna Caribou Herd. This is an incredibly important subsistence resource for numerous communities throughout the range of the herd. The Council endeavors to ensure that the herd will be able to recover so that it will remain a subsistence resource in the future. Therefore, the Council requests a full closure to any harvest of the Mulchatna Caribou Herd until it rebounds to the established stable population objective of at least 30,000 caribou.

The Council recently supported the Delegation of Authority to the Togiak National Wildlife Refuge Manager to manage the Mulchatna Caribou Herd. We request that the manager works closely in communication with the Council and local communities in the management of this critical subsistence resource. Local subsistence communities are out on the ground observing the caribou and its environment and can share their Traditional Knowledge. It is also imperative to keep communications open on the caribou conservation measures and to work together through these very difficult times when yet another critical subsistence resource is being restricted.

6. Request for information about Snowy Owl population

The Council has heard of declining snowy owl sightings throughout the Yukon-Kuskokwim Delta and would like a report on their population assessment and migration patterns. While the Council recognizes that the Federal Subsistence Program does not manage migratory birds, the snowy owl is important to subsistence communities in the Yukon-Kuskokwim Delta and an important indicator of overall ecosystem health. The Council wonders if the snowy owls are declining due to lack of prey. The Council has observed declines in Alaska hare populations and just supported a proposal to reduce subsistence harvest as a conservation measure. Conservation measures may be needed for the snowy owl as well.

The Yukon-Kuskokwim Delta 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 Yukon-Kuskokwim Delta Region. If you have any questions regarding this report, please contact me via Eva Patton, Council Coordinator, Office of Subsistence Management, at eva_patton@fws.gov, or 1-800-478-1456 or 1-907-786-3888.

Sincerely,

Raymond Oney
Chair

cc Federal Subsistence Board
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record