



Ahtna Intertribal Resource Commission

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Southcentral Regional Advisory Council
Via DeAnna Perry, Council Coordinator
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To members of the Southcentral Regional Advisory Council:

We are writing to urge the Southcentral Regional Advisory Council (SCRAC) to encourage stronger federal management of salmon on the Copper River. Salmon runs have been on a decline for at least five years.

We are in times of salmon conservation, with returns in recent years coming in lower than forecasted resulting in fisheries management restrictions. 2020 saw the smallest sockeye run on record. With respect to Chinook salmon, escapement goals have repeatedly not been met in recent years and the State of Alaska is planning to lower the lower bound of the Chinook salmon escapement goal, continuing a trend of lower the Copper River king salmon escapement.

The existing Copper River Salmon management plans and management regime should be evaluated to ensure federal customary and traditional uses receive a priority under ANILCA Title VIII, protections that the Ahtna people fought so hard to ensure. The existing management regime only requires 17,500 other salmon (other than sockeye) to enter the Copper River. How is state management ensuring that the current Chinook salmon escapement goal of 24,000 is met through the current In River Run Goal as outlined in 5 AAC 24.360?

We request the SCRAC demand more proactive federal subsistence management presence and activities involved with the sustainable management of Copper River salmon fisheries. Federal managers must play an active management role to ensure the conservation of stock resilience and diversity, particularly in light of environmental change. Such action could include federal closure to non-federally qualified users in order to ensure that federal subsistence salmon harvest needs are provided.

We also request the SCRAC develop federal subsistence use amounts findings for the next SCRAC Annual Report to the Federal Subsistence Board, which originally was intended for the Secretaries of the Interior and Agriculture's attention. These Copper River sockeye and Chinook salmon federal subsistence use amounts (needs) should be included in the annual report, as outlined in the duties of the SCRAC in its charter (Article 4(d)(2)). These findings on the anticipated federal subsistence needs for Chinook and sockeye salmon during the 2022 fishing season should be developed to ensure that all federally qualified subsistence users have the opportunity to continue the subsistence salmon fishing way of life and that we can teach our children, nieces and nephews, and grandchildren how to catch, process and store fish, and to learn Ahtna traditional salmon stewardship values, techniques, and rules.

Ahtna Intertribal Resource Commission (AITRC) has reported this issue to the SCRAC at least three times during the past five years. At the spring, 2021 meeting, AITRC verbally requested that the RAC include this concern in their letter to the Federal Subsistence Board (FSB). We were disappointed that our concerns were not addressed at this time.

We recognize and appreciate the efforts of Wrangell-St. Elias National Park staff, who have met with AITRC throughout the fishing season this year to discuss conservation concerns. We would like to invite RAC members support these efforts at engagement, and to become more actively involved with federal in-season management authorities.

Sincerely,


Karen Linnell
AITRC Executive Director