

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To:
YKDRAC.B25027

APRIL 04 2025

Anthony Christianson, Chair
Federal Subsistence Board
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to request that the Federal Subsistence Board (Board) elevate the Council's concerns regarding the need to retain the current withdrawals of Alaska Native Claims Settlement Act Section 17(d)(1) lands (D-1 lands) to the Secretary of the Interior.

The Council held a public meeting on March 4-5, 2025, in Bethel. Among the items discussed was the importance of D-1 lands for subsistence. We previously wrote to both the Bureau of Land Management (BLM) and the Board about this issue (see enclosed). Due to recent events, our concerns have resurfaced. In January, the current Administration released Executive Order 14153 that provides direction to re-instate several Public Land Orders that would revoke the D-1 withdrawals of approximately 28 million acres.

The Council is extremely concerned about the impacts that revoking D-1 land withdrawals could have to subsistence in our region and statewide. Revoking D-1 land withdrawals in part or in total would result in a loss of Federal lands, on which rural residents have the benefits of a federal subsistence priority. It would open those lands up to potential development that would have further negative impacts to the environment and animal resources, upon which subsistence users depend.

There are 13,322,000 acres of D-1 lands in the Bering Sea-Western Interior BLM planning area that includes our region. A vast majority of these lands are located along or near the Yukon and Kuskokwim rivers and their tributaries, in areas that provide critical habitat, migration corridors, and ecosystem services. Our Council cannot emphasize enough the importance of keeping as much of this land as possible under Federal subsistence jurisdiction and closed to development. The world is changing at a fast pace and the future presents many uncertainties. We need as many levels of protection left in place as possible because our resources and traditional practices are already under threat. Our region is experiencing significant food insecurity due to the on-going salmon crisis and caribou hunting closures. Revoking withdrawals in our region will

result in mineral development projects and threats to subsistence lifeways. Keeping lands open to Federal subsistence management allows for a rural preference of use in times of conservation concern and gives rural residents a greater opportunity to continue customary and traditional practices, which sustain us nutritionally, culturally, and spiritually.

The Council requests that you elevate these concerns to the new Secretary of the Interior with the recommendation that he retain all D-1 land withdrawals for the on-going protection of subsistence resources and lifeways, upon which rural Alaskans depend. Thank you for considering our concerns and request. If you have any questions or would like to discuss this further, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Jacqueline Cleveland
Chair

Enclosures

1. YKDRAC Comments D1 Withdrawals 2.2.2024
2. Three RAC ltr elevate D-1 lands issue 4.17.24

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, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game

Administrative Record

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In Reply Refer To:
OSM.24007

FEB 02 2024

Steven Cohn, State Director
Bureau of Land Management
222 W 7th Ave., #13
Anchorage, AK 99513

Dear Mr. Cohn,

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide the Council's **comments on the Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) Withdrawals Draft Environmental Impact Statement (DEIS) (DOI-BLM-AK-0000-2022-0003-EIS)** and express concerns for how the Council receives notifications from the Bureau of Land Management (BLM) on issues and comment opportunities such as this one.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act (FACA). Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 10-12, 2023, in Anchorage. Among the items discussed was the ANCSA 17(d)(1) Withdrawals DEIS. The Council is extremely concerned about the impacts that revoking withdrawals could have to subsistence statewide. Revocation of 17(d)(1) withdrawals in part or in total would result in a loss of Federal lands on which rural residents have the benefits of a Federal subsistence priority, and it would open those lands up to potential development that would have further negative impacts to the environment and animal resources subsistence users depend on.

In the Bering Sea-Western Interior BLM planning area there are 13,322,000 acres of withdrawal


under evaluation in the DEIS. A vast majority of these lands are located along or near the Yukon and Kuskokwim rivers and their tributaries, in areas that provide critical habitat, migration corridors, and ecosystem services. Our Council cannot emphasize enough the importance of keeping as much of this land as possible under Federal subsistence jurisdiction and closed to development. The world is changing at a fast pace and the future presents many uncertainties. We need as many levels of protection left in place as possible because our resources and traditional practices are already under threat. Our region is experiencing significant food insecurity due to the on-going salmon crisis and caribou hunting closures. Residents of our region are already fighting the proposed Donlin Gold Mine and the impacts it will have to our subsistence lifeways. Revoking withdrawals in our region will result in even more mineral development projects and threats to subsistence. Keeping lands open to Federal subsistence management allows for a rural preference of use in times of conservation and gives rural residents a greater opportunity to continue customary and traditional practices, which sustain us nutritionally, culturally, and spiritually.

Our Council urges the BLM to adopt the alternative that will have the least impact to subsistence and leave the most amount of land under Federal subsistence management jurisdiction. Although the alternatives presented in the DEIS were not available for review during our fall 2023 meeting, the sentiments expressed by the Council at that time are in line with selection of Alternative A, the no-action alternative, which has since been released.

The Council would additionally like to let BLM know our concerns about how our Council was made aware of this issue and the accompanying opportunity for public comment on this topic. BLM did not notify the Council of this issue prior to our fall 2023 meeting; a non-governmental advocacy organization informed us. We should have been notified directly by BLM about the forthcoming ANCSA 17(d)(1) Withdrawals DEIS given the significance of this issue and its potential impacts to subsistence, as well as our Council's authority under ANILCA. We do thank BLM staff for agreeing to present on this issue to our Council at our fall 2023 meeting after we found out about it from other sources. However, in the future, we request that BLM *directly* notifies affected Subsistence Regional Advisory Councils of all upcoming and open public comment periods so that we may exercise our Council's authority under ANILCA to review and make recommendations on plans and proposals that have impacts to subsistence. It is particularly important that we receive timely notice of issues such as this one because we are chartered under FACA and we must conduct all our business in a public forum. We cannot elect to submit comments as a Council except during our biannual meetings. Further, even after BLM staff presented to us on this issue and notified us there would be an upcoming public comment period, the Council never received notification from BLM when the comment period actually opened. Again, we had to rely on other organizations and our Coordinator to make us aware.

The Council thanks you for considering these comments and for working to improve the process by which Subsistence Regional Advisory Councils are notified of such issues and comment periods in the future. If you have any questions or would like to discuss this further, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@fws.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray", is centered on a light gray rectangular background.

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, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record

**Yukon-Kuskokwim Delta, Seward Peninsula, and Eastern Interior Alaska Subsistence
Regional Advisory Councils**

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In Reply Refer To:
OSM.24049

APRIL 17 2024

Anthony Christianson, Chair
Federal Subsistence Board
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

We write to you on behalf of the Yukon-Kuskokwim Delta, Seward Peninsula, and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to request that the Federal Subsistence Board (Board) elevate the concerns of several Councils regarding the proposed withdrawal of Alaska Native Claims Settlement Act (ANCSA) Section 17(d)(1) lands to the Secretary of Interior.

The ten Subsistence Regional Advisory Councils met together during the All-Council Meeting March 5-8, 2024, in Anchorage Alaska. Among the items discussed was the pending decision on the Bureau of Land Management (BLM) draft Environmental Impact Statement (DOI-BLM-AK-0000-2022-0003-EIS). The Councils are extremely concerned about the potential revocation of ANCSA 17(d)(1) withdrawals in part or in total. The pending decision has the potential to negatively impact millions of acres of land and hundreds of rural communities.

A revocation of any size will result in a loss of habitat protections and the Federal subsistence priority. Our subsistence resources and way of life are already under threat. D-1 lands support large contiguous landscapes and provide critical habitat for fish and wildlife that we depend on for food, culture, and well-being. We strongly advocate for the No Action Alternative to be selected because it will retain the status quo and keep these lands protected from development.

The Councils ask that the Board expeditiously forward these concerns to the Secretary of the Interior and urge her to take action to protect our subsistence resources and way of life by keeping D-1 protections in place. One Council has previously requested you elevate these concerns and several other Councils have submitted comments to BLM in support of maintaining D-1 protections as they currently stand. We have enclosed copies of those submissions with this letter for your awareness.

Thank you for your timely attention to this important matter. If you have questions or would like

to discuss this further, please contact Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or katerina_wessels@fws.gov.

Sincerely,



Raymond Oney, Chair
Yukon-Kuskokwim Delta
Regional Advisory Council



Louis Green, Chair
Seward Peninsula
Regional Advisory Council



Robert Wright, Sr., Chair
Eastern Interior Alaska
Regional Advisory Council

Enclosures

1. BBRAC Support for D-1 Protections
2. YKDRAC Comments on ANCSA D-1 Withdrawals
3. WIRAC Comments on ANCSA D-1 Withdrawals
4. WIRAC Request to FSB to Elevate ANCSA D-1 Withdrawals
5. SPRAC Comments on ANCSA D-1 Withdrawals

cc: Federal Subsistence Board

Bristol Bay Subsistence Regional Advisory Council
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Seward Peninsula Subsistence Regional Advisory Council
Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
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