

Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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In reply refer to:
OSM.B25039

JUNE 05 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 Western Interior Alaska Subsistence Regional Advisory Council (Council) to ask that the Federal Subsistence Board (Board) elevate to the Secretary of the Interior the Council's concerns on the ongoing Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) (D-1) withdrawals.

The Council voted to send correspondence concerning this topic during their public meeting held in Anchorage on April 4–5, 2023 (OSM.23095 dated July 31, 2023). This subject was again discussed during the Council's public meeting held February 25–26, 2025, in Fairbanks, where the Council chose to update the correspondence language and resend to the Board with the request to elevate to the Secretary of the Interior.

The Council supports the Bureau of Land Management (BLM) process to review and thoughtfully consider the impacts that decisions on the ANCSA D-1 withdrawals will have on fish and wildlife populations and subsistence resources. Federally qualified subsistence users in the Western Interior Region will be highly impacted by the BLM decisions on the D-1 Environmental Impact Statement (EIS) because of the large contiguous block of BLM managed lands in our region under review in this process, the Bering Sea-Western Interior Planning Area (BSWI Area). The 28 million acres of BLM managed lands that are analyzed in the EIS support important subsistence resources in our region and throughout the state. They are central to fish spawning and rearing habitat and contain important territory for moose and caribou.

The originally prepared five Public Land Orders (PLOs) lacked adequate consultation of the federally recognized Tribes and federally qualified subsistence users who will be impacted by these orders. The decision to advance the PLOs was also made without potentially considering how lifting D-1 orders could negatively affect cultural use areas, fish and wildlife habitats, subsistence resources, hunting, fishing, gathering rights, and the food security of hundreds of communities and thousands of federally qualified subsistence users. The potential loss of subsistence priority if the BSWI Area lands are conveyed to the State of Alaska is very

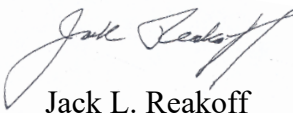
concerning for subsistence users in the Western Interior subsistence resource region.

Under ANCSA, the Secretary of the Interior must evaluate whether the D-1 protection should remain in place to protect the public interest in the Western Interior subsistence resource region. The Council believes it is in the public's best interest to retain the D-1 public land orders in the BSWI Area to maintain land under Federal management. Alaska is at the forefront of increased climate variability and based on our on-the-ground observations widespread impacts are already occurring including melting permafrost, coastal and riverbank erosion, increasing air and water temperatures, and habitat displacements of fish and wildlife populations across subarctic and arctic environments. For instance, this area of the middle Yukon River has had catastrophic Chinook, Fall and Summer Chum, and Coho Salmon returns since 2020 where escapement goals have frequently not been met, much less our subsistence needs, and the salmon do not appear to be rebounding despite significant fishing restrictions and closures for all users on the river. This in turn makes subsistence users even more dependent on other resources to meet our subsistence needs.

These environments support our subsistence resources, and they are changing rapidly. With so many unknowns, it is in the public interest to adopt precautionary approaches and to prioritize the protection of intact lands and pristine waters of the natural environment. We urge action to retain the D-1 public land orders in the BSWI Area to protect subsistence habitat and resources that support the way of life of our region's federally qualified subsistence users.

The Council would like to thank you in advance for taking the views of the Council into consideration. Any questions or comments regarding this matter can be addressed to me through our Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_batespilcher@ios.doi.gov.

Sincerely,



Jack L. Reakoff
Chair

cc: Federal Subsistence Board
Office of Subsistence Management
Kevin Pendergrast, Alaska State Director, Bureau of Land Management
Lisa Doehl, Alaska Region, Department of Interior Office of the Solicitor
Western Interior Alaska Subsistence Regional Advisory Council
Interagency Staff Committee
Administrative Record