



## Federal Subsistence Board

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



In Reply Refer To:  
OSM.A25012

Jacqueline Cleveland, Chair  
Yukon-Kuskokwim Delta Subsistence  
Regional Advisory Council  
c/o Office of Subsistence Management  
1101 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Chair Cleveland:

This letter responds to the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council's (Council) Fiscal Year 2024 Annual Report. The Federal Subsistence Board (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. Elevate awareness and response for the on-going Yukon River salmon crisis**

*The Council has written to the Board extensively in the past on this topic, and we refer to our previous Annual Reports and letters, and joint letters from this Council and other Councils for detailed descriptions of our unchanged concerns regarding Yukon River salmon. The Council continues to wait for a response from the Board on this subject. We are appreciative of the response we received from the past Administration acknowledging our concerns on this issue and hope that the current Administration will work to address the salmon crisis. The Council requests that the Board brief the new administration as soon as possible on the critical issues facing our salmon and the tremendous hardships being placed on subsistence users due to on-going fishing closures. Further, we request responses to the letters that have been previously sent.*

### **Response:**

We concur that the impacts of this crisis on your region are devastating. You have highlighted the importance of this issue through multiple Council letters, joint Council letters, and Annual Reports. All of these communications on this and similar salmon related topics have been shared with the former Secretaries as requested via transmittal letters, memo attachments, and in person

with the Secretary of the Interior. We also invited the North Pacific Fishery Management Council to speak at our public meetings and to keep Councils updated on a regular basis. Through direct replies, transmittal letters, discussion at Board meetings, and replies to your annual reports, we continue to be responsive to your communications. Your concerns will be relayed to the current Secretaries of the Interior and Agriculture as we will await their direction.

**2. Request for the Board to take the lead on coordinating interjurisdictional management of salmon**

*The Council sees the need for the Board to take the lead on coordinating interjurisdictional management of salmon. No agency has stepped up to initiate meaningful actions toward ecosystem-based salmon management across jurisdictions or to ensure that commercial users share equally in the burden of conservation with subsistence users. Many Councils have written to the Board on the need for interjurisdictional management of salmon, and those letters have been elevated to the Secretaries of the Interior and Agriculture. Still, no action has occurred, and federally qualified subsistence users continue to suffer and not meet their subsistence needs. The Council requests that the Board take the lead and facilitate a meeting between Federal subsistence fisheries managers, Alaska Department of Fish and Game, and the National Marine Fisheries Service for the purpose of developing and implementing a framework for interjurisdictional management of salmon across their entire habitat.*

**Response:**

Each of the Yukon Region Councils have worked to bring these concerns forward in multiple venues. We agree that joint effort between all parties responsible for managing salmon under different jurisdictions would benefit future salmon populations. One model of interjurisdictional resource management is the Alaska Migratory Bird Co-Management Council (AMBCC). The Council can invite the AMBCC representatives to their meeting to better understand how such model works. However, the Board's delegated authority from the Secretaries is limited to "...administering the subsistence taking and uses of fish and wildlife on public lands and the related promulgation and signature authority for regulations..." (36 CFR 242.10(a)). The Board's authorities, powers, and duties do not extend to taking the lead on coordinating interjurisdictional management of salmon. That ability lies within the scope of the Secretaries.

The avenue for affecting change in activities outside of Federal subsistence jurisdiction is engaging with the decision-making bodies or other non-governmental organizations. The Board encourages Councils, the public, and others to participate in such decision-making processes as the Alaska Board of Fisheries, the Alaska Board of Game, and the North Pacific Fishery Management Council and invite representatives of these bodies to your meetings to discuss your recommended strategy to address salmon crises. Open dialogues can lead to meaningful collaborations, so your voice and participation are crucial in shaping the future of subsistence activities.

### **3. Request to enter into co-management agreement with Yukon River Intertribal Fish Commission**

*The Council requests that the Board take the steps necessary to initiate a co-management agreement with the Yukon River Intertribal Fish Commission for management of salmon on the Yukon River. The Council has seen great benefits from the agreement between the U.S. Fish and Wildlife Service and the Kuskokwim River Intertribal Fish Commission that is currently in place on the Kuskokwim River. It has resulted in increased trust between Tribes and Federal managers and has allowed for local and traditional ecological knowledge to be incorporated more directly into management. Although the Yukon River is a larger system with its own unique management challenges, the process used on the Kuskokwim River can serve as an initial model that can then be shaped to fit the needs of the Yukon River. It is extremely important for the Board to prioritize the capacity building of tribes and Alaska Native organizations when it comes to resource management and to offer them a seat at the table when making decisions.*

#### **Response:**

The Memorandum of Understanding (MOU) between the Kuskokwim River Inter-Tribal Fish Commission and the U.S. Fish and Wildlife Service (FWS), Alaska Region, was initiated in 2014 by then Deputy Secretary of the Interior Mike Conner and signed by the Alaska Regional Director of the FWS along with the Federal in-season fisheries manager from the Yukon Delta National Wildlife Refuge in 2016. The Kuskokwim River MOU is an example of a successful partnership among Federal fisheries managers and Tribes along the Kuskokwim River and has served as a model that can be looked to by other regions throughout Alaska.

We reached out to the FWS, and they shared their readiness to work with the Yukon River Inter-Tribal Fish Commission (YRITFC). This was noted in FWS report at your Council's Winter 2025 meeting. They highlighted that they will be working more with the YRITFC, in addition to their engagement with the Yukon River Drainage Fisheries Association (YRDFA). Holly Carroll, the FWS Yukon River Federal in-season manager, agrees that it is important to have tribal organizations involved in decision making. Ms. Carroll has been working closely with current staff and the Chair of the YRITFC and met with their Executive Council to discuss next steps to help build trust, develop a working relationship, establish regular information sharing, develop decision-making processes (both within the YRITFC and between the YRITFC and resource management agencies), and establish cross training on scientific fisheries management and traditional ecological knowledge for decision-making. Ms. Carroll has stated that she will attend all YRITFC meetings she is invited to.

We support the continued efforts of the FWS to work with the YRITFC.

### **4. More balanced geographic representation on the Council**

*The Council would like to have a more balanced geographic representation amongst members. As of fall 2024, the membership is skewed heavily toward Kuskokwim River representation. We*

*hope that future appointments to the Council will bring additional Yukon River representatives as well as representatives from Mekoryuk and Nelson Island communities. We request that the Board seriously consider geographic representation, which is an item in our Council Charter, when making recommendations for appointments.*

**Response:**

Every year, through the Office of Subsistence Management (OSM), we broadly solicit applications from communities within the geographic boundary of the Yukon-Kuskokwim Delta subsistence resource region. Examples of this outreach are mailing application packets, advertising on public radio, social media, and websites, and conducting word-of-mouth and personal targeted outreach. During our summer executive sessions, we review applications and make recommendations to the Secretaries of the Interior and Agriculture for new Council members with geographic representation in mind.

In order to achieve a good geographic balance, a sufficient number of qualified applicants is needed from all parts of the region. We are happy to report that in 2025 the composition of the Council is well balanced with six members representing Kuskokwim communities, four members representing Yukon communities, and two members representing Yukon Delta/coastal communities. The Council currently has one vacant seat.

While OSM conducts an extensive campaign to solicit new Council member applications each year, the Council knows their region best and has connections and relationships with many people in communities. We would like to ask for your assistance in recruiting qualified applicants from Mekoryuk and Nelson Island communities to help gain additional geographic representation.

**Other Annual Report Topics for Information Purposes Only**

The Board thanks the Council for sharing information in your FY-2024 Annual Report on other issues significant to your region and subsistence users, (5) conflicts between local moose hunters and non-local sport hunters on the lower Yukon River; (6) the need for a public member of the Board from the Yukon-Kuskokwim Delta region; (7) Alaska Native Claims Settlement Act (ANCSA) D-1 land withdrawals; (8) Donlin Gold SEIS and mining impacts to subsistence and the environment; (9) crane habitat near Marshall from the Calista gravel quarry; (10) Mulchatna caribou population and support for Alaska Department of Fish and Game predator control efforts; (11) disappearing fish camps and the cultural impacts of closed or reduced fishing; (12) meaningful tribal involvement in decision making and capacity building of tribal organizations in management and science; (13) North Pacific Fishery Management Council (NPFMC) Chum Salmon Bycatch Preliminary Draft EIS; (14) need to reduce total allowable catch for pollock in commercial fisheries; (15) reductions in halibut sizes and need to reduce bycatch of Pacific Halibut; and (16) link between Coho Salmon harvested in Area M and low returns to AYK and need for genetic sampling and stock assessment of Coho Salmon harvest and 100 percent observer coverage in Area M commercial fisheries.

We appreciate and value the traditional knowledge, observations, and expertise you share. With this information, we are better prepared to make informed decisions.

In closing, we want to thank you and your Council for your continued involvement in the Federal Subsistence Management Program and the work you do on behalf of federally qualified subsistence users. We appreciate your efforts and are confident that federally qualified subsistence users of the Yukon-Kuskokwim Delta Region are well represented through your work.

Sincerely,

Anthony Christianson  
Chair

cc: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Federal Subsistence Board  
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