



Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 - 6199



In Reply Refer To
OSM.A25026

AUGUST 19 2025

Jacqueline Cleveland, Chair
Yukon-Kuskokwim Delta Subsistence
Regional Advisory Council
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Cleveland:

This letter provides a report on the actions taken by the Federal Subsistence Board (Board) on proposals and closure reviews affecting federally qualified subsistence users. The Board met on February 4–7, 2025, to consider fisheries closure reviews and proposed changes to Federal subsistence management regulations for the harvest of fish, shellfish, and wildlife in Federal public waters and lands in Alaska.

The Board acted on 18 fisheries proposals, two wildlife proposals, four fisheries closure reviews, and one non-rural determination proposal during the 2025–27 fisheries regulatory cycle. The Board deferred their decision on statewide wildlife proposal WP24-01 regarding the sale of brown bear hides to their summer work session and requested additional recommendations from the Subsistence Regional Advisory Councils (Councils). The Board took action on WP24-01 on July 24, 2025. The enclosed table provides a summary of Board actions on proposals and closure reviews affecting your region.

Section 805(c) of the Alaska National Interest Lands Conservation Act (ANILCA) provides that the Board will accept the recommendations of a Subsistence Regional Advisory Council (Council) regarding take unless, (1) the recommendation is not supported by substantial evidence, (2) the recommendation violates recognized principles of fish and wildlife management, or (3) adopting the recommendation would be detrimental to the satisfaction of subsistence needs. When a Council's recommendation is not adopted, the Board is required to set forth the factual basis and reasons for the decision.

See the enclosed 805(c) report, which provides justification for when the Board's decision did not follow your Council's recommendations on proposals and/or closure reviews.

Additional details of the Board's actions and deliberations are contained in the meeting transcripts. Copies of the transcripts may be obtained by calling toll free number

1-800-478-1456. They are also available online at the Office of Subsistence Management website, <https://www.doi.gov/subsistence/library/transcripts/federal-subsistence-board>.

The Board appreciates your Council's active involvement in and diligence with the regulatory process. The ten Councils continue to be the foundation of the Federal Subsistence Management Program, and the stewardship shown by the Council Chairs and their representatives at the Board meeting was noteworthy.

If you have any questions regarding the summary of the Board's actions, please contact Brooke McDavid, Council Coordinator, at 907-891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Christianson".

Anthony Christianson
Chair

Enclosures: 1. Board Action Summary Table
2. 2025 805(c) Report

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council members
Office of Subsistence Management
Interagency Staff Committee
Administrative Record

Enclosure 1 – Federal Subsistence Board action summary at the February 2025 regulatory meeting

Fisheries Proposals and Closure Reviews Affecting Yukon-Kuskokwim Delta Region

Region	Proposal/Closure Review	Yukon-Kuskokwim Delta Council Recommendation	Federal Subsistence Board Action
Yukon-Kuskokwim Delta	FP25-15 – Decrease allowable distance between subsistence set gillnets in tributaries of part of the Kuskokwim River	Oppose	Reject
Western Interior	FP25-16 – Specify subsistence gear types and Arctic Grayling harvest and possession limits in portions of Bonanza Creek and Kanuti River drainages	Support	Adopt
Eastern Interior	FP25-17 – Rescind closure to subsistence fishing in the Delta River, allow only rod and reel gear, and mirror State sport fish harvest and possession limits	Support	Adopt w/OSM modification
Eastern Interior	FCR23-05 – Review closure to subsistence fishing nonsalmon in the Delta River	Did not consider (based on FP25-17 action)	Take no action (based on FP25-17 action)
Eastern Interior	FCR25-02 – Review closure of Arctic Grayling subsistence harvest in Nome Creek drainage of Beaver Creek	Rescind the closure	Retain status quo

Wildlife Proposals Affecting Yukon-Kuskokwim Delta Region

Region	Proposal/Closure Review	Yukon-Kuskokwim Delta Council Recommendation	Federal Subsistence Board Action
Statewide	WP24-01 (deferred) – Allow the sale of brown bear hides	Support with OSM February 2025 modification	Adopt w/OSM February 2025 modification (July 2025)

FEDERAL SUBSISTENCE BOARD 805(c) REPORT

February 4–7, 2025

Anchorage, AK

The purpose of this 805(c) report is to detail how the Board’s action differed from the Council’s recommendations based on these criteria. Section 805(c) of the Alaska National Interest Lands Conservation Act provides that the “Secretary ... shall consider the report and recommendations of the regional advisory councils concerning the taking of fish and wildlife on the public lands within their respective regions for subsistence uses.” The Secretary has delegated authority to issue regulations for the take of fish and wildlife to the Federal Subsistence Board. Pursuant to this language in Section 805(c), the Board defers to the Council’s recommendations. However, Section 805(c) also provides that the Board “may choose not to follow any recommendations which [it] determines is not supported by substantial evidence, violates recognized principles of fish and wildlife conservation, or would be detrimental to the satisfaction of subsistence needs.”

YUKON-NORTHERN AREA FISHERIES PROPOSALS

Crossover Proposals

Fisheries Proposal FP25-17 – Delta River gear types and possession limits

DESCRIPTION: Proposal FP25-17 requested that the closure to the harvest of all fish in the Delta River be rescinded and regulations be modified to allow rod and reel gear only in the drainage and mirror State sport fish harvest and possession limits.

COUNCIL RECOMMENDATIONS:

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council – **Support**

Western Interior Alaska Subsistence Regional Advisory Council – **Take no action and defer to home region**

Eastern Interior Alaska Subsistence Regional Advisory Council – **Support as modified by OSM**

BOARD ACTION: Adopt as modified by OSM

JUSTIFICATION: A limited subsistence harvest on the mainstem of the Delta River using rod and reel only will provide federally qualified subsistence users with harvest opportunities in an area that is currently closed while also helping to protect fish populations from overharvest. If this area is opened to rod and reel only, State sportfishing harvest and possession limits would apply, which would align State and Federal regulations, reducing regulatory confusion and enforcement actions. Since there would be no permit required for federally qualified subsistence users if this closure is rescinded, some thought should be given to such a requirement to track harvest, given the ease of access in the area and the potential for overharvest. Other portions of the Delta River drainage, such as the Delta River tributaries and the Tangle Lakes area, are currently open to subsistence fishing under both Federal and State regulations. Limiting federally

qualified subsistence users to rod and reel only in these areas would make Federal regulations more restrictive than State regulations. However, the tributaries of the Delta River are vulnerable to overharvest due to their small size and because they are easily accessible; therefore, such a restriction is warranted due to conservation concerns. The Tangle Lakes system supports a Federal and State subsistence fishery and a rod and reel restriction is not warranted in this area in order to maintain harvest opportunities for federally qualified subsistence users while also minimizing regulatory complexity.

YUKON-NORTHERN AREA FISHERIES CLOSURE REVIEWS

Crossover Closures

Fisheries Closure Review FCR25-02 – Nome Creek Arctic Grayling

DESCRIPTION: Closure FCR25-02 reviews the closure to the harvest of Arctic Grayling in the Nome Creek drainage by federally qualified subsistence users.

COUNCIL RECOMMENDATIONS:

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council – **Rescind**

Western Interior Alaska Subsistence Regional Advisory Council – **Take no action and defer to home region**

Eastern Interior Alaska Subsistence Regional Advisory Council – **Retain status quo**

BOARD ACTION: Retain status quo

JUSTIFICATION: Retaining the closure would protect Arctic grayling populations from overharvest until a proposal to restrict Federal subsistence harvest and/or gear types in the closure area can be submitted. The Federal in-season manager does not currently have a way to track harvest levels or increased harvest if the closure is rescinded, and there is no scientific data to inform creation of a harvest limit, if necessary. The Board requests recommendation from the Eastern Interior Council as the local knowledge holders. If, in the future, the Council were to submit a proposal to allow harvest with rod and reel and set a harvest limit, the Board could review the analysis and potentially support it. The proposal would need to be submitted in the next Federal fishery regulatory cycle.