

Kodiak/Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To:

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JANUARY 23 2026

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

Dear Chair Christianson,

I am providing comments on behalf of the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) regarding the Federal Subsistence Management Program (Program) Review being undertaken by the Secretary of the Interior and the Secretary of Agriculture (Secretaries).

The Council held a public meeting on September 17–18, 2025, in Cold Bay during which members received a briefing from Sara Taylor, Policy Advisor to the Secretary of Interior for Alaska Affairs, regarding the public scoping process the Secretaries are conducting to evaluate whether the Program is meeting the needs of subsistence users. At the time of our meeting, Ms. Taylor identified specific topics on which feedback would be requested and indicated that official notice of the public scoping process was expected to publish in early October 2025.

In response to the limited advanced notice provided prior to the Council's meeting, the Council voted to send a letter to the Federal Subsistence Board requesting that the 60-day comment period be extended through March 2026, following the conclusion of the winter 2026 Council meeting cycle. The Council expressed concern that the abbreviated timeline did not allow sufficient opportunity for the Subsistence Regional Advisory Councils to fully consider the review topics or engage meaningfully with regional subsistence users. Extending the comment deadline would allow all ten Councils to provide more thorough and informed input. The Council also developed the following comments in response to the topic areas Ms. Taylor identified, which are consistent with the formal scoping notice that later published on December 15, 2025.

1. Interior Department move of the Office of Subsistence Management to the Office of the Assistant Secretary for Policy, Management and Budget

The Council noted that the recent move of the Office of Subsistence Management (OSM) to the

Office of the Assistant Secretary for Policy, Management and Budget (PMB) has not been in place long enough to fully evaluate its effectiveness. Although the transition appears to be working well so far and may ultimately reduce bureaucracy and improve operations, Council members noted that the move was very disruptive to staff, the public, and program stability, and expressed concern about any additional reorganization in the near future. Overall, members recommended that the current structure be given sufficient time to function before implementing any additional changes.

2. Criteria for Regional Advisory Council membership

The Council expressed concern about the length of the Council member nomination and appointment process, noting the process can take ten months or longer and the lack of interim updates makes it difficult for applicants to plan their time commitments. Council members also discussed the statutory composition of Councils, currently set at a 70/30 balance between subsistence and sport/commercial representation. While some supported the current ratio for providing diverse perspectives, some Council members expressed a preference for increasing subsistence representation to an 80/20 ratio, to reflect the subsistence priorities established under the Alaska National Interest Lands Conservation Act (ANILCA) while still allowing input from sport and commercial users.

3. Membership of the Federal Subsistence Board

Some Council members noted that the increased number of public members on the Board has improved balance and representation by providing more public seats than Agency seats and including Tribally nominated seats. The Council emphasized the importance of geographic diversity to ensure all regions are represented and acknowledged that increasing public membership changes the dynamics of Board decision-making and could impact how efficiently Board decisions are implemented. Members expressed cautious optimism and will monitor how these changes affect Board operations. The Council also noted the importance of maintaining some public seats not tied to Tribal recommendations, ensuring that rural residents who are not affiliated with Tribes still have a pathway to serve on the Board in accordance with ANILCA.

4. Federal regulations and state regulations for duplication and inconsistency

The Council emphasized that federal regulations should remain distinct from state regulations, reflecting differing mandates under ANILCA and state law. State and federal regulations should be published together in a single, accessible booklet to allow eligible users to easily determine which rules apply. The Council encouraged efforts to identify and resolve any inconsistencies where possible, recognizing that some differences reflect jurisdictional authority rather than errors or oversight.

5. Regulations governing special actions

The Council strongly supported maintaining the Board's authority to issue Special Actions, noting their continuing relevance and utility for adaptive management in response to unique or unforeseen circumstances. Recent examples like emergency moose permits issued by the Organized Village of Kake and special actions for salmon fishing on the Kuskokwim River demonstrate the ongoing necessity of this authority. The Council emphasized the importance of a clear process and structure for Special Actions, including adherence to established time limits and procedures, to ensure transparency, prevent conflict, and maintain trust.

6. Role of the State and the Alaska Department of Fish and Game (ADF&G) in the Federal Subsistence Management Program

The Council highlighted the importance of ADF&G biologists and staff providing critical technical data on fish and wildlife stocks for the federal subsistence management process. Effective management relies on collaboration between state and federal agencies, and this technical partnership should be maintained or strengthened. Council members noted differences between federal and state mandates, emphasizing that under ANILCA, federal management prioritizes subsistence uses for rural residents, while the State of Alaska manages resources for all users under maximum sustained yield and without a rural preference. These differing mandates can create tension, particularly during times of scarcity or high-level policy disputes. The Council also emphasized the value of allowing direct communication between regional/local ADF&G staff and OSM staff to support effective subsistence management at the local level, and they recommend returning to the more open communication process and policy that was used in the past.

7. Board's process for rural determinations

The Council observed that the evaluation process for non-rural determinations is qualitative and flexible, rather than based on strict population thresholds or other prescriptive criteria. While this approach allows nuanced and adaptable decisions, Council members recognized that the lack of concrete criteria can create frustration and uncertainty, as seen in recent decisions in the Ketchikan area. The Council suggested that the policy document be re-titled and formatted as "procedures" to improve consistency and clearly communicate that it is the official guidance used in non-rural determinations.

8. Other topics relating to federal subsistence management

a. Subsistence priority clarity and implementation

The Council identified ongoing challenges related to how subsistence priority is defined, interpreted, and applied. While the concept appears clear in statute, members noted that its meaning, implementation, and feasibility are often unclear in practice and can vary by user group, species, and geographic area. This lack of clarity is particularly evident for salmon, where management authority shifts among various federal and state management bodies, and no single

body has full responsibility across a stock's entire range. Some Council members expressed frustration that subsistence users are often curtailed to the same extent as sport users, undermining the intent of a subsistence priority. Others noted that in certain programs, such as migratory bird management, subsistence users receive expanded seasons and substantial harvest opportunity. Overall, the Council encouraged the program review to clarify how subsistence priority should be implemented across overlapping jurisdictions and to improve consistency and understanding among all managers and users.

b. Online access to subsistence permits and program services

The Council emphasized the importance of improving online access to subsistence permits and program information as part of ensuring subsistence users' needs are met. Members noted the absence of a clear, accessible online pathway for obtaining permits, such as a web portal, downloadable forms, or clear contact information. While acknowledging that the program has historically relied on in-person or community-based assistance, the Council observed that expectations have shifted and that younger users increasingly rely on digital access. The Council supported developing an online permit system or interface, while also maintaining multiple access options, including in-person and community-based support, to ensure accessibility for all users.

The Council appreciates your assistance in relaying these comments to the Secretaries for their consideration. The Council values the opportunity to participate in the scoping process and would welcome continued engagement as the program review moves forward. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator, Leigh Honig at (907) 891-9053 or leigh_honig@ios.doi.gov.

Sincerely,



Rebecca Skinner Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Kodiak/ Aleutians Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record