

**Bristol Bay Subsistence Regional Advisory Council**

c/o Office of Subsistence Management

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503-6199

Phone: (907) 787-3888, Fax: (907) 786-3898

Toll Free: 1-800-478-1456

In Reply Refer To:

OSM.R26005

Anthony Christianson, Chair  
Federal Subsistence Board  
1011 E. Tudor Road  
Anchorage, Alaska 99503

Dear Chair Christianson,

On behalf of the Bristol Bay Subsistence Regional Advisory Council (Council), I am writing to provide comments for the Federal Subsistence Management Program (Program) Programmatic Review. We appreciate the opportunity for Council members to share perspectives based on direct experience with subsistence management in our region.

The Council held its public meeting on January 12, 2026, in Anchorage, during which members received a briefing on the public scoping process being conducted by the Secretaries to evaluate whether the Program is meeting the needs of subsistence users. The Council respectfully submits the following comments for consideration.

**1. Program Administration and Organizational Structure (Office of Subsistence Management)**

In response to the scoping question regarding the effectiveness of the Program's administrative structure, Council members discussed the relocation of the Office of Subsistence Management (OSM) from the U.S. Fish and Wildlife Service (USFWS) to the Office of the Assistant Secretary for Policy, Management and Budget. Members expressed concern about the loss of administrative and technical support services that previously existed under USFWS and noted that responsibility for these services remains unclear and unresolved.

The Council does not support additional organizational changes at this time and believes the Program needs stability to function effectively.

**2. Regional Advisory Council Structure, Membership, and Effectiveness**

Regarding whether the current structure and membership criteria of Regional Advisory Councils are effective, the Council supports maintaining the existing criteria and does not recommend changes at this time. Members emphasized that maintaining diverse representation from

different subsistence user communities has strengthened Council composition by broadening perspectives and improved the quality of recommendations.

At the same time, Council members noted that subsistence needs are still not fully represented in practice, particularly among Yup'ik speakers and residents of smaller communities.

Approximately 70 percent of subsistence representation is not being adequately met. Members also discussed whether allowing applicants to identify more than one user group, such as both subsistence and commercial use, on Council applications could help better reflect the full range of perspectives individuals bring to the process. Continued attention to outreach, language access, application flexibility, and participation is necessary to ensure that all subsistence users can meaningfully engage in the Program.

### **3. Federal Subsistence Board Composition and Functioning**

In response to scoping questions regarding the composition and effectiveness of the Federal Subsistence Board, the Council supports maintaining the current make-up of the Board, including the additional public seats. It is important that all subsistence users, including non-Native rural residents, continue to be represented as public members. This diversity has positively improved the Federal Subsistence Board (Board) by increasing representation and perspective.

Council members recommend providing dedicated staff or technical assistance to public Board members, comparable to the support provided to agency representatives, to ensure public members can effectively review materials and participate fully in Board deliberations.

### **4. Coordination Between Federal and State Regulations**

Regarding duplication or inconsistency between federal and state subsistence regulations, Council members expressed concern about regulatory complexity and confusion. Subsistence users often struggle to determine which regulations apply based on land status, increasing the risk of unintentional violations. Where feasible, consistency between federal and state regulations is beneficial and reduces confusion for users.

At the same time, the Council values the ability of the federal system to maintain regulatory differences, when necessary, as these differences sometimes allow for essential subsistence uses that would otherwise not be accommodated.

### **5. Special Action Regulations and Management Flexibility**

In response to questions about the effectiveness of special action regulations, the Council strongly supports their continued use. Hunting and fishing seasons do not always align with when people are able to access resources, and environmental conditions change annually. The ability to extend seasons or adjust regulations is essential to meeting subsistence needs.

Council members emphasized that special actions are an important management tool and noted that the federal system provides greater flexibility than the state system in responding to emergency or time-sensitive subsistence needs.

### **6. Role of the State of Alaska in the Federal Subsistence Management Program**

Regarding coordination with the State of Alaska, Council members emphasized the importance of continued staff reports and participation by the Alaska Department of Fish and Game during Council and Board meetings. These contributions are essential to informed decision-making and effective management within the Program.

## **7. Procedures for Rural and Non-Rural Determinations**

In response to scoping questions on rural determination procedures, the Council noted it has limited experience with non-rural determinations, as all communities within the Bristol Bay region are currently designated as rural. Council members expressed concern about the potential impacts that changes to rural determination criteria could have on subsistence users. If criteria are revised, it is critical that the Bristol Bay region remains rural under Alaska National Interest Lands Conservation Act (ANILCA).

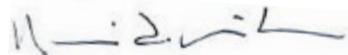
## **8. Additional Program Considerations and Subsistence User Needs**

- Council members emphasized the importance of ensuring that ANILCA is consistently followed in all aspects of federal subsistence management.
- Members raised concerns regarding predator control and commercial hunting and their impacts on subsistence resources.
- The Council also noted that non-English-speaking residents are often excluded due to a lack of translated regulations and materials, and regulations and other important information should be made available in local native languages to promote meaningful participation and increase regulatory compliance.
- Members suggested exploring a system that would allow a set number of community-based permits to be available for use when conditions are appropriate for harvesting, rather than tying all harvest opportunities strictly to fixed season dates.
- The Council highlighted the need for improved law enforcement training on cultural and traditional practices, including respect for people's space, property, and subsistence activities.
- Finally, the Council emphasized the importance of holding joint meetings of all ten Regional Advisory Council meetings, including meetings dedicated to discussing recommendations resulting from this Programmatic Review.

Thank you for passing on the Council's comments as part of the Programmatic Review. The Council appreciates the opportunity to contribute to this process and looks forward to continued engagement to ensure federal subsistence management effectively meets the needs of subsistence users.

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](mailto:leigh_honig@ios.doi.gov).

Sincerely,



Nanci Morris Lyon,  
Chair

cc: Federal Subsistence Board  
Interagency Staff Committee  
Bristol Bay Subsistence Regional Advisory Council  
Office of Subsistence Management  
Administrative Record