

Yukon-Kuskokwim Delta Subsistence Regional Advisory Councils

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:
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February 25 2026

Anthony Christianson, Chair
Federal Subsistence Board
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

I write on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to request that you relay our comments to the Secretaries of the Interior and Agriculture regarding the Secretarial review of the Federal Subsistence Management Program (Program).

The Council held a public meeting in Bethel on January 20-22, 2026, to discuss the topics outlined in the Secretarial review, along with other agenda items. During the meeting, the Council developed the following comments for submission to the Secretaries.

1. Move of the Office of Subsistence Management (OSM) to the Office of the Assistant Secretary for Policy, Management, and Budget (OS-PMB)

Overall, the Council is satisfied with the move but feels it is still too recent to fully assess changes at the ground level. The Council hopes to receive ongoing updates from OSM about how the new arrangement is working out.

The Council requests that lines of communication between the Councils, Board, and Secretaries be improved for efficiency and to ensure meaningful direct dialogue with the Council, especially on major subsistence issues that fall outside of the Board's jurisdiction and need the Secretaries' attention. Council letters requesting elevation are often significantly delayed in transmission, and once they are sent, there is frequently no reply or follow-up discussion from the Secretaries'

offices. Several Councils raised this concern at the 2024 All-Council meeting and in subsequent discussions, yet no improvements have been noticed (see Enclosures 1 & 2).

The Council puts in a lot of effort and time to write letters and raise important subsistence issues, but they are left wondering if their concerns are being heard. What actions are being taken in response to the suggestions and requests we provide as appointees of the Secretary and as an advisory body?

2. Criteria for Regional Advisory Council membership

The Council feels that the criteria for Regional Advisory Council membership are sufficient and do not need to be changed. However, there are some adjustments that could improve the overall process. The Council highlighted that the term “subsistence user” diminishes the depth of knowledge and qualifications of Council members. Council members are experts whose wealth of knowledge, experience, and insights are essential to the Federal Subsistence Management Program; without their contribution the Program could not function properly or effectively.

Currently, Council members are not fairly compensated for the critical role they play in the Program. Members sacrifice a lot to attend meetings – whether in person or virtually – including time away from jobs, family, and essential subsistence activities. The Council, along with others across the State, has continually advocated for a policy change that would allow members to receive a stipend or honorarium for days spent participating in Council meetings (see Enclosure 3). Providing adequate compensation would also help with membership recruitment, likely increasing the number of applicants and filling vacancies on many Councils.

When scoring Council applicants, the Council would like to see more emphasis placed on local and Indigenous knowledge compared to the other criteria because this is the most important qualification for membership. The Council also suggests that the scoring criteria incorporate additional points for incumbent members who have prior experience on the Council, especially for those with long-term service. Familiarity with the Program and its regulatory processes is invaluable and should be noted in a more meaningful way during applicant evaluation. Further, the incumbent application process should be simplified so that returning members do not have to repeatedly provide the same information and undergo the full interview process every three years.

Lastly, the Council notes the importance of having elders serve on Councils and suggests adding two elder advisor seats to each Council. These would be non-voting seats, similar to the recently added young adult leader seat.

3. Federal Subsistence Board membership

The Council fully supports the current composition of the Board and strongly opposes any changes to the number of public members. The public members were very important additions that took many years to happen. A regulatory body tasked with making decisions about subsistence must include members with direct subsistence experience. Agency heads do not have this firsthand subsistence experience and are often new to Alaska.

Additionally, the public members contribute critical perspectives from across Alaska, providing a direct way for local and traditional ecological knowledge to be incorporated into Board discussions. Their presence ensures that local and traditional knowledge is elevated and respected in the same way as Western knowledge, and it strengthens trust in the system. The Council feels the value of the public members cannot be emphasized enough.

The Council submitted comments during the previous scoping period supporting the addition of the most recent three tribally-nominated public members (see Enclosure 4). The Council further suggests that Regional Advisory Councils be given a role in nominating public members to the Board.

4. Federal regulations and State regulations for duplication and inconsistency

Elder members of the Council set the stage for discussing this topic by recalling times before Statehood, when living a subsistence life required hard work but was also far less complicated before all sorts of regulations and restrictions started being imposed. Both State and Federal regulations were forced on us without proper consultations with the Native people who had stewarded their traditional homelands for generations. Over time, these regulations have greatly impacted our traditional subsistence practices, and today we are so heavily regulated that it is difficult to get the food we need. This historical context needs to be remembered when discussing regulations.

The Council noted that the dual management system is important because it provides a rural priority under Federal regulations; however, it is also very confusing for subsistence users. The Council requests increased outreach and education to help people better understand the overlaps and differences between Federal and State regulations and regulatory processes. While this outreach and education should be targeted to the general public, focused efforts should also be made to help young people learn about these systems in school or at camps.

The Council pointed out that the constant battles between the State and Federal governments are frustrating because these high-level political disputes trickle down and directly impact local people's abilities to harvest the food they need. Continued litigation feels like a constant threat to our subsistence rights and creates anxiety in communities.

Especially with respect to salmon, the Council stressed that something must be done immediately to make the two systems work together to protect this critical resource and uphold the subsistence priority. State-managed commercial fisheries in Area M continue to intercept Western Alaska salmon despite serious conservation concerns for the future of Chinook and Chum salmon stocks and while subsistence users face closures and severe restrictions on fishing. Both State and Federal laws require a subsistence priority, but it is not being provided.

The Council highlighted that the issue of navigable waters is particularly frustrating because it severely complicates jurisdictional boundaries and impacts the rural priority for hunting. The Yukon-Kuskokwim Delta is entirely off the road system and our numerous rivers and streams are the main way we travel throughout the region. Most of Unit 18 lands are Federal, with the rest being mostly Native corporation lands and only a small portion being State land. Allowing non-federally qualified users to hunt below the mean high-water line has led to increasing numbers of outside hunters coming to the region especially to hunt moose, increasing competition with rural subsistence users and leading to conflicts. Additionally, the navigable waters issue combined with the checkerboard land status, makes it very difficult for anyone to tell where Federal or State jurisdiction starts and stops when travelling on the land and waterways. And then it is completely different when it comes to fishing jurisdiction. The Council requests that more effort be made to put signs along rivers to clearly mark Federal and State jurisdiction.

The Council also noted that the misalignment of regulatory cycles timing between the Federal and State systems makes it difficult and confusing for subsistence users to keep track of which process is happening from year to year. The Council suggests that efforts be made to explore how to better align the timing of Federal and State regulatory cycles. Further, both systems should work together to reduce confusion wherever possible and make regulations more easily accessible and understandable to the average member of the public.

The Council requests that better maps be produced for regulation books that show not just Federal versus State lands but also include Native allotments and regional and village corporation lands. Additionally, large land-status maps should also be supplied to all communities for local people to reference and placed at boat launches and airports so that non-locals can reference them.

In many cases, the Council feels that State policies and regulations should be changed to better match Federal ones. For example, the Council would like the State to implement something similar to the Government-to-Government consultations and hold more public hearings as well. Overall, the Council feels that the Federal program does a better job of respecting and incorporating local perspectives in decision making through consultations, public hearings, deference to the Regional Advisory Councils, Tribal trust responsibilities, co-management agreements, and allowing virtual participation in meetings. The Alaska Boards of Fisheries and Game do not allow call-in or virtual testimony from the public, which greatly reduces the ability of rural Alaskans to participate in the public process. Some Council members noted that this feels like an intentional decision to prevent their opinions from being heard.

5. Regulations governing special actions

The Council noted that the current system for special actions is working well and does not need to be changed. Special actions help to timely address issues that arise outside of the normal regulatory cycle. Such issues are more prevalent in times of diminishing resources, like we are experiencing now with salmon. Special actions help protect resources when there are conservation concerns and can help federally qualified subsistence users in rural areas meet their needs. Sometimes it is necessary to implement closures to non-federally qualified users to protect the resource and meet the needs of federally qualified subsistence users. The Council emphasized that several past special actions in our region have been really helpful and critically important.

The Council appreciates the co-management arrangement between the U. S. Fish and Wildlife Service and the Kuskokwim Inter-tribal Fish Commission (KRITFC) for salmon on the Kuskokwim River. The in-season manager consults with KRITFC and ensures they have an equal seat at the management table, including making recommendations for special actions. The Council views this as a successful example of co-management and believes this should be used in other places across the State, including the Yukon River. The Council wants to emphasize the importance of consulting with Tribes and conducting public hearings so that local people can provide input on proposed special actions.

6. Role of the State and the Alaska Department of Fish and Game in the Federal Subsistence Management Program

The Council does not think that the Alaska Department of Fish and Game (ADF&G) should have a voting seat on the Federal Subsistence Board, nor should the Board defer to the State in its decision-making. The Council noted that the rural priority established in ANILCA must be protected at all costs. The State already participates in Board meetings and provides input into the process.

Council members acknowledged the valuable work of ADF&G field staff and managers, who often work closely with local people and collect important resource management and harvest data. They also noted the importance of State staff attendance at Council meetings, as local staff contribute a great deal to discussions and help provide a useful cross-reference when comparing the State and Federal regulations. The Council understands that ADF&G cannot be at every meeting because they have busy schedules but would like to see their attendance encouraged whenever possible. There was some frustration expressed about higher level political issues trickling down and preventing more open interaction and communication with the Council.

An elder Council member offered this message in closing of the topic discussion, “We should work together instead of being against one another because once we work together and come to an understanding, we’ll be blessed.”

7. Board procedures on non-rural determinations

The Council advises that the Board does not rely solely on a community population size without considering other factors in making non-rural determinations. They support a more nuanced, case-by-case approach to determinations. Council members recalled having to fight to keep Bethel designated as rural in the past, despite it being very far off the road system, having a heavy reliance on subsistence foods, and longstanding traditional patterns of use and sharing networks. They also noted the high costs and limited availability of store-bought food, and how detrimental it would be to local people if the community status were to change. One Council member emphasized a sentence found in reference materials provided to the Council: *Rural status provides the foundation for subsistence priority on federal public lands to help ensure continuation of subsistence way of life in Alaska.*

The Council also submits a special request to the Secretaries regarding eligibility under the Federal program by those impacted by natural disasters. The Council feels that it is extremely important to ensure federally qualified subsistence users who are evacuated and relocated to urban areas after natural disasters do not lose their rural residency status. Recently, Typhoon Halong devastated several communities in our region of Western Alaska, forcing families to relocate through no choice of their own. The Council requests that these families should be granted special permission to continue qualifying to hunt, trap, and fish under Federal subsistence regulations while their homes and communities are rebuilt or relocated.

8. Additional Council comments on other topics

a. Western Alaska Salmon Crisis – The Yukon River Councils and the people of Western and Interior Alaska have long been requesting meaningful action from the Federal and State governments to address this crisis. We are exhausted from continually advocating across multiple regulatory arenas for a resource that is so vital to our way of life, yet still seeing government agencies fail to address the issue appropriately.

The Council requests that the Secretaries initiate action toward an interjurisdictional, ecosystem-based approach to salmon management, one that prioritizes conservation and subsistence over other uses across both marine and in-river environments. We respectfully request review of the letters previously sent by our Council and others on this issue and kindly ask for direct engagement with the Councils on this critical and time-sensitive issue (see Enclosures 5 & 6).

b. Co-management and traditional ecological knowledge as standards in resource management – The Council emphasizes that co-management should be a standard practice adopted in both fish

and wildlife management across the State. More collaboration with Tribal governments and organizations is needed in resource management and research. Co-management ensures that traditional ecological knowledge is regarded and incorporated equally along with scientific data, and it builds trust in the system by giving those most directly affected by management decisions a meaningful seat at the decision-making table.

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 would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Jaqueline Cleveland
Chair

Enclosures:

1. Nine Council letter re: programmatic correspondence issues (4/3/2024)
2. YKDRAC letter re: lack of correspondence replies (9/27/2024)
3. Nine Council letter re: Council member compensation (4/3/2024)
4. YKDRAC comments re: FSB Membership proposed rule (4/17/2024)
5. Seven Council letter re: fisheries issues and requests (3/28/2024)
6. YKDRAC letter requesting coordinated salmon management (3/3/2025)

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