

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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OSM.R26019

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson:

The Eastern Interior Alaska Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2025 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held on December 16-18, 2025, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 3-5, 2026 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Eastern Interior Alaska Region.

1. Delays in Council Letter Elevation and Lack of Engagement

The Council continues to be frustrated by the lengthy delays in elevating Council letters, which in some cases have taken more than a year to transmit despite addressing time-sensitive concerns. These frustrations extend to the lack of meaningful engagement on important subsistence issues that we raise as an advisory body to the Federal Subsistence Management Program (Program).

In our comments provided for the Secretarial review, the Council identified the following actions to help address these longstanding issues:

- *Develop a strategy* for how the Councils, the Board, and the Program can engage with the Secretaries and other agencies on major subsistence issues that fall outside the Board's authority but directly impact federally qualified subsistence users.
- *Establish clear, written policies* for Board and Board-agency correspondence, similar to the existing Council correspondence policy.
- *Develop guidance* for how OSM or the Board can advocate for federally qualified

subsistence users in other regulatory arenas involving cross-jurisdictional issues, for example, proposals or actions impacting Yukon River salmon at the North Pacific Fishery Management Council or Area M deliberations at the Alaska Board of Fisheries meetings.

The Council requests that the Board discuss and consider taking action on the above suggestions.

2. Inter-jurisdictional collaboration and Co-management for Rebuilding Yukon River Salmon

The Council asks the Board to follow up with the Offices of the Secretaries of the Interior and Agriculture (Secretaries) on previous Council letters regarding the need for inter-jurisdictional management of salmon. We also request that the Board seek guidance from the Secretaries on how to initiate an inter-jurisdictional collaborative management strategy to rebuild salmon on the Yukon River. To be effective, this effort will require collaboration between the Program, the State of Alaska, the Yukon River Panel, the National Marine Fisheries Service, and the Department of State. Additionally, the Council feels there should be greater cross-participation in each regulatory process, and one way to achieve this could be through establishing more liaison positions and/or fisheries specific liaison positions.

Another essential component of rebuilding Yukon River salmon is implementing a co-management framework that gives rural and Tribal voices a meaningful seat at the management table. The Gravel-to-Gravel initiative was an important step toward this goal, and the Council recommends expanding the MOU to include the National Marine Fisheries Service.

The Council also suggests that the Board invite representatives from the Secretaries' Offices to hear directly from subsistence users about the impacts of the salmon crisis. Public members on the Board, Council Chairs, and Tribal consortia representatives are well-positioned to help share their knowledge and experiences on this subject. Hearing directly from subsistence users is the only way to begin to fully understand how devastating the loss of salmon has been to our communities.

3. Add Requirement for Coordination with Tribal Entities on Salmon Management Actions

The Council requests that the Tanana Chiefs Conference Tribal Resource Stewardship Department, the Yukon River Drainage Fisheries Association, and the Yukon River Intertribal Fish Commission be added to the list of entities with whom the federal manager is required to coordinate for Yukon River salmon management actions. Western Interior Council supported this action at their Winter 2026 meeting. *[Add YKDRAC feedback before finalizing report].*

4. Outreach and Education to Address Hunter Conflicts and Ethics

The Council requests that the Board direct OSM and the agencies represented on the Board to prioritize funding or staff time to develop communications aimed at reducing hunter conflicts and improving hunter ethics. If each agency could dedicate even a small amount of funding

toward this effort, these resources could be combined to develop effective outreach and education materials. Hunter ethics is a statewide issue, and several Councils have echoed our requests to address it in the past. Some materials could be used statewide, while others could be tailored to regional conflict issues identified as priorities by the Councils. The Eastern Interior Council and other stakeholders have put significant efforts toward hunter ethics and conflict reduction initiatives in the past, but a lack of funding has prevented these initiatives from flourishing.

5. Council Comments on the Secretarial Review of the Program

The Council would appreciate the Board reviewing the full comments that our Council submitted jointly with the Western Interior Council for the Secretarial review (see Enclosure). Together, our two Councils provided in-depth comments on each of the topics identified in the review, as well as several additional topics that we believe require the attention of the Board and the Secretaries. We hope there will be an opportunity for further discussion between the Councils and the Board on all these topics.

Some items the Council identified, we believe the Board or OSM could begin to address without direction from the Secretaries include:

- Improving correspondence and Annual Report processes
- Making the Council member application process more efficient
- Exploring design options for a combined State-Federal regulations booklet
- Developing more detailed regulatory maps that show Native corporation lands
- Working toward renewing the MOA with the State of Alaska
- Modifying Board policy on rural/nonrural determinations to provide deference to the Councils
- Formalizing additional co-management arrangements

Additional priority topics that need the attention and engagement of the Secretaries include:

- Interjurisdictional, ecosystem-based management of salmon
- Processes for engaging with the Secretaries on issues outside the Board's jurisdiction, along with two-way communication with the Councils on such issues
- Publishing a comprehensive socio-economic analysis of subsistence in Alaska and how it has changed over time
- Requesting additional funding for effective administration of the Program and for resource management research
- Changing policy to allow OSM to conduct primary research

The Council asks that the Board and OSM discuss and consider taking action on the items within their purview and liaise with the Offices of the Secretaries on the other topics.

The Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the

Eastern Interior Alaska Region. If you have any questions regarding this report, please contact me via Brooke McDavid, Subsistence Council Coordinator, Office of Subsistence Management, at brooke_mcdavid@ios.doi.gov or 1-800-478-1456 or 907-891-9181.

Sincerely,

Robert “Charlie” Wright, Sr.
Chair

Enclosure: WI-EIRAC Comments for Secretarial Review (2/18/2026)

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Interagency Staff Committee
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record