

Western Interior Alaska Subsistence Regional Advisory Council

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FEBRUARY 26 2026

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

Dear Chairman Christianson:

The Western 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 18, 2025, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 24-25, 2026, meeting. The Council wishes to share information and raise a number of concerns dealing with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Western Interior Region.

1. Continuing Salmon Crisis

This portion of the Annual Report is similar to topics included in the Council's FY23 and FY24 Annual Reports. It will continue to appear in future reports until tangible steps are taken to reduce the burden subsistence users are carrying in relation to salmon conservation, or until the salmon go extinct. From the Councils' current perspective, the latter is an increasingly real possibility.

Subsistence Users Continue to Bear the Brunt of Salmon Conservation in the Yukon and Kuskokwim Drainages

The Council remains deeply concerned that federally and state-managed commercial fisheries continue to undermine federally qualified subsistence users' (FQSU) ability to meet subsistence needs. This includes the North Pacific Fishery Management Council's (NPFMC) regulation of the Bering Sea and Aleutian Islands (BSAI) pollock trawl fishery, as well as the Alaska Department of Fish and Game (ADF&G) and Alaska Board of Fisheries (BOF) management of the South Alaska Peninsula (Area M) salmon fishery.

In 2025, Chinook and Chum salmon returns to the Yukon River were again catastrophically low, leaving virtually no subsistence harvest opportunities. While Kuskokwim River returns were somewhat better, subsistence needs were still not met. Meanwhile, commercial fisheries continued to intercept Arctic–Yukon–Kuskokwim (AYK)–bound salmon in the marine environment—either as bycatch in the BSAI trawl fishery or as incidental harvest in Area M—despite persistent failures to meet escapement goals and, in the Yukon’s case, international treaty obligations.

The Council applauds the action taken by the NPFMC at its February 2026 meeting to mitigate the damage being done by the BSAI trawl fishery to AYK Chum Salmon. These steps are appreciated, and the Council is eager to see what results from these regulatory changes. Yet these regulatory changes continue to place the burden of conservation on subsistence users: commercial vessels continue fishing and catching AYK-bound salmon while subsistence users remain unable to harvest.

The BOF’s 2023 regulatory changes at the Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting, which governs Area M did not meaningfully address the marine interception of AYK salmon or balance conservation needs between commercial fisheries and FQSU. The BOF’s reliance on the fleet to “police themselves,” rather than adopting widely supported restrictions during periods of high AYK salmon presence, was especially concerning. The Council is hopeful that the BOF will take meaningful action at its upcoming February 2026 Alaska Peninsula/Aleutian Island/Chignik Finfish meeting to demonstrate that the State understands what sharing the burden of conservation truly entails.

Unaddressed Hatchery Component

Hatchery salmon compete with wild salmon for limited food resources in the marine environment, reducing the overall fitness of wild stocks. The Department of the Interior must recognize the ecological impacts of large-scale hatchery releases—both domestic and international. This understanding is essential to initiating discussions with other nations on establishing agreements to significantly reduce hatchery production and releases.

The State of Alaska must also limit the volume of hatchery releases currently authorized. The scale of hatchery production by both international partners and the State is not sustainable and poses a long-term threat to the health and viability of wild salmon populations in the North Pacific and Bering Sea.

Unsustainable Federal Commercial Fishing Quotas and Failure to Meet National Standards

The North Pacific Fishery Management Council recently approved a 1.4-million-metric-ton quota for the Bering Sea/Aleutian Islands trawl fleet targeting pollock in December 2025. This level of harvest is unsustainable and poses significant risks to marine ecosystems and subsistence resources, particularly because the Bering Sea, Aleutian Islands, and Gulf of Alaska are critical habitats for salmon originating from the AYK drainages.

The National Oceanic and Atmospheric Administration’s national standards, mandated under the Magnuson-Stevens Fishery Conservation and Management Act, require measures to prevent

overfishing and rely on the best scientific information. Yet in the AYK drainages, escapement goals are not being met and salmon populations continue to decline. Despite claims of using the best science, the evidence suggests otherwise.

National Standards 1 (Optimum Yield), 2 (Scientific Information), 4 (Allocations), 8 (Community Impacts), and 9 (Bycatch) are being violated. The reliance on cost-benefit analyses focuses narrowly on economic metrics of potential actions and disregards the cultural significance and subsistence value of fisheries to our communities. Families along these rivers depend on these resources for food security and cultural continuity. The lack of fish is devastating communities, as the Board has heard repeatedly.

Need to Liaise with Other Federal and State Departments and Agencies on Salmon Issue

Salmon do not recognize the jurisdictional silos that the Federal and State governments have created around commercial fishing management. There is an immediate need for the Secretaries of the Interior and Agriculture to work directly with the Secretary of Commerce and the State of Alaska. It is unacceptable for FQSU to be told that, even as salmon stocks essential to subsistence are pushed toward extinction in the Yukon River, nothing can be done.

Address What Can Be Fixed

It is understood that climate plays a major role in the current decline of salmon abundance along Alaska's west coast, but climate is not something that either the State or the Federal Government can control. What can be controlled is how many salmon are allowed to reach their spawning grounds, and right now, every single fish that can make it upriver is needed for recovery. Finger-pointing at other commercial industries or blaming the weather does nothing to put more salmon in the rivers. Subsistence users' nets and baskets remain dry; the same cannot be said for the commercial fishing fleet.

Recommendation:

The Council appreciates the Joint Council meeting held between this Council and the EIRAC during the Fall 2025 meeting cycle, where cross-regional discussions on salmon concerns were held, and the Councils and took joint action on correspondence to the NPFMC and BOF regarding the meetings mentioned above. The Council is also pleased to hear that the Program is working to improve lines of communication with the State.

However, this is not enough.

The Board must immediately elevate the salmon crisis to the Secretaries of the Interior and Agriculture and ensure coordinated engagement with the Secretary of Commerce and the State of Alaska to address federal management issues affecting salmon.

The Council seeks clear guidance from OSM on how the Solicitor can support efforts to correct regulatory inequities and restore balance between commercial use and sustainability. This includes engagement with the Solicitor's Office and the Department of Commerce to ensure compliance with national standards.

2. Need for Enforcement Funding and Check Stations

The Council continues to receive reports of wanton waste committed by hunters visiting the region's lands and waterways. Reports provided to the Council describe suspicious bush plane activity near rural airports, boats carrying multiple hunters and large racks, but not low enough in the water to allow for multiple quarters of moose to coincide with the trophies. Other reports described full game bags being jettisoned off boats into waterways, spoiled meat being discarded in rural dumps, and nonlocal hunters attempting to hand off spoiled or sour meat to rural residents in the name of a 'donation'.

Recommendation:

The Council strongly recommends increased funding for DOI federal enforcement programs and offices, the filling of vacant DOI federal enforcement positions, and ensuring that federal enforcement officers have the ability and opportunity to build and maintain strong working relationships with their State counterparts in the Department of Public Safety. The Council recognizes that Alaska is a vast state with limited Federal and State enforcement officers dedicated to natural resources protection, but more must be done. Additionally, the Council would like to see check stations established and staffed in heavily utilized access points in the Interior, such as the Yukon River bridge or hub airports, to conduct hunting compliance checks.

3. Fund Wildlife Resource Monitoring Program

The Fisheries Resource Monitoring Program (FRMP) has been of great benefit to the state and to subsistence resources. The Council requests that a Wildlife Resource Monitoring Program (WRMP) be established. Numerous biological needs and data gaps across the state would benefit greatly from such a program. The Council also hears similar concerns from other regions regarding declining mammal populations and increasing pressure on these resources for all user groups.

Recommendation:

It is unclear to the Council why a WRMP was not created when the FRMP was established decades ago. The Council recommends addressing this gap by creating a WRMP. Because the FRMP already provides a basic framework, only minimal modifications would be needed to support terrestrial research projects. The only missing component is funding.

4. Finalize the Sheep Management Strategy Guidelines

The Council undertook drafting the Dall Sheep Management Strategy Guidelines (enclosed) in response to concerns about sheep populations in Unit 24A and a portion of 26B. The Council feels the region must rely on scientific data to better understand the status of sheep and support the recovery of this species. Beginning with the FY22 Annual Report, the Council has kept the Board informed of the progress of these strategy guidelines, and the Council now considers it final. The Gates of the Arctic Subsistence Resource Commission (SRC) endorses the strategy, with potential further action being taken by the SRC in creation of a separate action to further the plan on NPS lands.

Recommendation:

The Council previously requested that OSM use the Dall Sheep Management Strategy as a guideline when drafting future analyses for relevant proposals and that OSM distribute the strategy to relevant agencies when applicable. Additionally, the Council requests that the Board approve this plan and direct relevant agencies to review and follow this management strategy when Dall sheep are discussed, and management decisions are made.

The remainder of this report is for informational purposes only, and the Council does not request a response. However, these issues are significant and important, and the Board will benefit from being aware of them.

5. An Evaluation of Current and Anticipated Subsistence Needs for Fish and Wildlife Populations Within the Region

Salmon

While there is cautious hope for Kuskokwim River Chinook and Chum runs, as it appears that runs are beginning to rebound, the Yukon River remains in a far more dire state. Chinook and both summer and fall Chum Salmon continue to experience a near-total collapse. Smokehouses, freezers, and pantries are empty of salmon. Summer fish camps and dog yards are silent and unused. Cultural practices continue to erode, and the current generation is growing up opening food wrapped in plastic while staring at screens instead of learning from their elders how to catch, cut, preserve, and prepare salmon.

Nonsalmon

The Council has repeatedly expressed concern, both in past Annual Reports and through the Priority Information Needs process, about the increased pressure on whitefish and northern pike populations. As reliance on these fish species grows to fill the void left by the lack of salmon, the risk of causing long-term harm to these populations increases.

Mammals

Many Council members report that moose hunting has become increasingly difficult due to declining moose populations, challenging weather conditions, and rising nonlocal hunting pressure. Central Arctic Caribou that once were present in the northern part of the region have not come into Koyukuk River communities since the Dalton Highway was constructed, and this, as well as other herds that have previously been present in the region are experiencing downward population trends.

Black bears, once plentiful and utilized as a food source, are now absent from large portions of the landscape where they were historically common. Brown bears can no longer depend on plentiful salmon and berries to build fat reserves for winter, and are having to turn to predation of black bears, and increasingly, caribou and moose calves. This further accelerates the downward trend of caribou populations and adds to concerns about moose populations.

Wolves are plentiful and are heavily trapped by experienced local hunters in an effort to bolster struggling moose populations. Yet nonlocal hunters often reap the benefits of these conservation efforts, arriving with powerful boats and expensive gear to harvest the very moose local residents are working so hard to protect.

Weather

Seasonal timing and typical monthly weather patterns are no longer reliable. Recent high-water events during key salmon rearing times in Yukon tributaries have scoured out salmon rearing habitat, and the long term impacts on future salmon returns remain unknown. Additional high-water episodes in the fall made it difficult for residents to utilize the river corridors for customary moose hunting practices. These ever-changing weather patterns also challenge the winter survival of ungulates, with rain-on-snow events becoming more commonplace, creating crusted snow conditions that hinder winter foraging. Fall arrives later, and spring weather is increasingly erratic. This past calving season, Central Arctic Caribou calves were born into subfreezing nighttime temperatures and several inches of snow, reducing survival from the outset, and creating long-term consequences for a herd already in decline. Colder, wetter weather and hotter, drier weather both take a toll on small mammals, birds, and berry availability, further straining the ecosystem and the subsistence resources communities depend on.

6. Ambler Road

The Council strongly opposes the proposed Ambler Road. Our position is informed by hard lessons from the Dalton Highway, which was initially promised as a private road intended to protect subsistence activities, wildlife populations, and migration routes – a promise that was quickly broken, leaving lasting harm.

The Ambler Road threatens to repeat this history on an even greater scale. Its construction would fragment critical habitats, disrupt migration patterns, and jeopardize the delicate balance of ecosystems that sustain both wildlife and the communities that depend on them. For generations, these lands and waterways have supported subsistence practices central to cultural identity and food security. The intrusion of this road risks eroding these traditions and livelihoods, with consequences that extend far beyond the immediate footprint—some predictable, others unknowable.

The accelerated pace of this process and the timing of its fast-tracking raise serious concerns about transparency and due diligence. While the Council acknowledges that this matter lies outside the Board's direct authority and does not carry a formal recommendation, we believe it is imperative to document our strong opposition to both the road and the manner in which it is being advanced.

7. Chinook Moratorium and Lack of Consultation/Transparency by the State of Alaska

Yukon River communities are in the midst of a seven-year moratorium on Chinook Salmon, imposed by the ADF&G without any public process or consultation. At the same time,

Canadian-bound Chinook Salmon continue to be caught in State-directed commercial fishing openers, including Area M, and then sold in the open market for profit.

Salmon are a dynamic and fascinating species. To ensure Alaska meets its treaty obligations with Canada, protections must exist in both their natal and spawning freshwater habitat and marine environment where they spend the majority of their life cycle. Currently, the responsibility for meeting treaty obligations has been placed squarely on the backs of subsistence users and subsistence users only. The Council recognizes that the Board has no authority over this issue, but it remains a matter of deep importance to subsistence users throughout the Yukon Drainage.

8. Joint Council Meetings

The Council found it highly productive to meet with the Eastern Interior Alaska Subsistence Regional Advisory Council in December of 2025 during the rescheduled fall 2025 meetings. The Council thanks OSM for ensuring the meeting happened, and strongly encourages holding additional joint Council meetings to support cross-regional collaboration and dialogue.

Prioritizing more cross-regional meetings would benefit the Councils, the Federal Subsistence Management Program, and the resources by creating and maintaining Council relationships, and fostering collaboration and dialogue. Regular cross-regional meetings would also help streamline future all-Council meetings. Many needed conversations between neighboring Councils would already have taken place, freeing up limited time during the all-Council meetings for other priority topics and help to identify which work sessions and trainings would be best to engage all regions.

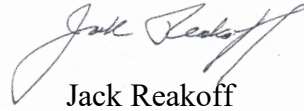
9. Frustration Over Lack of Action or Forward Movement

The Council wishes to voice deep concern over the lack of any tangible, positive change in this region's subsistence resources in the past several decades. The current membership of this Council collectively holds more than 130 years of accumulated experience, yet members increasingly feel that they attend meetings, discuss issues, draft correspondence and these reports, only to return the following season to find that no meaningful progress has resulted from these efforts. It is exhausting to continually have to fight simply to continue to exist.

The Western Interior Alaska Subsistence Regional Advisory 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 Western Interior Region.

If you have any questions regarding this report, please contact me via Nissa Pilcher, Subsistence Council Coordinator, Office of Subsistence Management, at nissa_pilcher@ios.doi.gov, or 1-800-478-1456 or (907) 891-9054.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Reakoff". The signature is fluid and cursive, with a large initial "J" and "R".

Jack Reakoff
Chair

Enclosure: Topic 4: Dall Sheep Management Strategy Guidelines

cc: Federal Subsistence Board

Western 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