



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



In Reply Refer To:
OSM.F26017

Nancy Morris Lyon, Chair
Bristol Bay Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Lyon:

This letter responds to the Bristol Bay Subsistence Regional Advisory Council's (Council) Fiscal Year 2025 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to consider these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

1. Tribal Consultation Process and Timing

"The Council appreciates the Board's efforts to consult with Tribes and rural communities on subsistence issues. However, the Council notes that many consultation opportunities occur during the summer, when subsistence activities are at their peaks, which limits participation. The Council recommends that the Board review the timing and accessibility of Tribal consultations to ensure meaningful engagement by rural residents and federally qualified subsistence users. The Council also respectfully requests the Board's guidance or clarification on potential improvements to the consultation process."

Response:

We have long been aware of the challenges of our Program's regulatory cycles and the limitations of summer-based consultations for Tribes and rural community participation. For this reason, the Board added a regularly scheduled Tribal and ANCSA Corporation consultation opportunity to immediately follow the fall Council meetings, usually scheduled for early November of each year. This past wildlife cycle was our third year providing a second statewide consultation opportunity on regulatory proposals, and participation is growing.

Other regularly scheduled opportunities for consultations take place every summer in August and immediately preceding each Board regulatory meeting. We rely on these regularly scheduled opportunities to ensure timely input into Board decision making. Consultations on issues outside of the regulatory cycle are available upon request, as are staff-to-staff meetings on the Federal Subsistence Management Program (Program) and regulatory processes. The Board values all participation in the program. The Board has directed staff to continue their work updating the Board's consultation guidelines.

2. Outreach and Engagement

"The Council emphasizes the need for continued outreach to rural residents, Tribes, and village corporations to clarify processes and overcome language or communication barriers. The Council recommends additional resources to help inform communities about the Federal Subsistence Management Program (Program) and how to participate in Council processes. Moreover, the Council respectfully requests the Board's support and guidance on expanding these outreach efforts."

Response:

The Board agrees that strengthening outreach and engagement with rural residents, Tribes, and village corporations is essential to ensuring meaningful participation in the Program. The Board shares the Council's concern that many users are not fully familiar with Program processes or opportunities, such as submitting public comments, understanding proposal timelines, or engaging with Regional Advisory Councils, and it recognizes the need to improve communication and reduce language or access barriers.

The Board encourages Program leadership to explore ways to expand outreach within current budget and staffing constraints. OSM's FY26 budget was reduced by \$2 million, and the office continues to operate at roughly 30% reduced capacity. Despite these limitations, the Board agrees that outreach must remain a priority and requests that OSM continue evaluating how to enhance communication tools, materials, and practices under existing resources.

The Board also notes that OSM has already begun examining options to revamp its outreach practices, including improving clarity of information, increasing accessibility, and strengthening communication with rural communities. One example of this work is OSM's expanded efforts to encourage Tribes and ANCSA Corporations during Tribal engagement sessions, Council meetings, and office visits to designate an official representative to monitor or attend Council and Board meetings even during busy subsistence seasons. Another positive development is that OSM recently filled the Subsistence Outreach Coordinator position permanently, and this staff member will continue identifying ways to enhance the Program's outreach practices. The Board requests that OSM keep the Council informed as these efforts progress and ensure that Council input is incorporated into future improvements.

Chair Morris Lyon

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The Board appreciates the Council's commitment to ensuring that all subsistence users have the information they need to participate fully in the Program's processes.

The Board wants to thank the Council for sharing information in your FY-2025 Annual Report on other issues significant to the Council. The Board acknowledges the Council's concern that smaller and more remote communities in the region are not adequately represented on the Council. The Board welcomes the Council's support for the relocation of OSM to the Office of Policy, Management, and Budget and agrees that OSM needs adequate staffing and resources. The Board also agrees that the public members of the Board need sufficient staffing support and resources to carry out their duties in a proper way. Additionally, the Board recognizes and acknowledges the on-going decline of Chinook Salmon populations and wants to let the Council know that OSM convened a special strategizing meeting for the Council Chairs or their representatives on this salmon crisis topic on August 3, 2026. Your Council's Vice Chair attended the meeting and can provide more insights.

We recognize that you are uniquely positioned to offer first alerts to changing conditions and important trends that impact subsistence in your region. The Board appreciates and values the traditional knowledge, observations, and expertise you share. We make informed decisions thanks to the knowledge that you provide.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts. Federally qualified subsistence users of the Bristol Bay Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

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