



Federal Subsistence Board

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



In Reply Refer To:
OSM.F26029

Jacqueline Cleveland, Chair
Yukon-Kuskokwim Delta Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Cleveland:

This letter responds to the Yukon-Kuskokwim Delta 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. Struggling Salmon and Caribou Remain Priority Food Security Concerns

"Yukon and Kuskokwim River Salmon

Western Alaska salmon continue to struggle, and their declines are significantly impacting subsistence users who are unable to meet their needs. The Council has written extensively on this issue in the past, and we maintain our request for the Board to ask the Secretaries of the Interior and Agriculture for their guidance and intervention in this matter. We urge the Board to be proactive and invite the Secretaries or their representatives to meet with the Board and Council Chairs to discuss a path forward for an interjurisdictional, ecosystem-based approach to salmon management that prioritizes conservation and subsistence over other uses across both marine and in-river environments.

Mulchatna Caribou Herd

The Council is also concerned about the status of the Mulchatna Caribou Herd, another important subsistence resource for our region that is struggling. The population remains below management objectives, and the herd is currently closed to all hunting, including by federally qualified subsistence users. While we support the continuation of this closure for conservation reasons, we would like to see more coordinated efforts to rebuild the herd."

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Response:

The Board recognizes the serious, perennial challenges communities in your region face related to declining salmon and caribou resources. We acknowledge that the absence of coordinated interjurisdictional salmon management is having detrimental impacts on western Alaska salmon and the continuation of subsistence uses. From 2022 to 2024, the Board sent five letters, representing nine of ten Subsistence Regional Advisory Councils, to the Secretaries of the Interior and Agriculture (Secretaries) outlining Council recommendations for policy and co-management changes. In January 2025, the Office of the Secretary of the Interior acknowledged that administrative boundaries and jurisdictions do not support effective subsistence management of the entire salmon life-cycle and requested Council suggestions.

The Board has since received additional Council recommendations regarding statutory changes, interdepartmental coordination, and trawl fleet efficiencies to reduce salmon bycatch. These, along with previously referenced letters, were all sent to the new Secretaries in March 2026.

To continue this important discussion, on August 3, prior to the Board's 2026 summer August 4-5 work session, the Office of Subsistence Management (OSM) hosted a much-requested workshop with Council Chairs regarding the Alaska Salmon Crisis. The Board is committed to requesting an annual meeting with the Secretaries to discuss important subsistence issues such as those that fall outside of the Board's jurisdiction. Until we have further guidance, we continue to encourage the Councils to engage directly with other regulatory bodies such as Alaska Board of Fisheries and the North Pacific Fishery Management Council. The Board will also follow up on Council requests made to the Office of the Senior Advisor for Alaska Affairs at the April 2026 wildlife regulatory meeting to request interdepartmental engagement between the Department of Interior and Department of Commerce (NOAA NPFMC).

The Board recognizes the hardships that long-term closure to Mulchatna caribou hunting has caused to food security in your region. As the Mulchatna herd remains below population objectives, opportunities on smaller, resident herds are being identified. OSM has recently received a wildlife special action request of interest to your Council. Temporary Wildlife Special Action WSA26-05 requests opening an April hunt for caribou in the Cape Pierce area of Units 17A and 18. Your Council will be reviewing this special action request at the fall 2026 meeting. The Board is aware that your Council sent a letter to ADF&G and USFWS to request the formation of a Mulchatna caribou working group and encourage you to continue working with these agencies toward this goal.

The Board agrees that coordination with our Federal, State, Tribal, and rural partners is critical for addressing declines in shared wide-ranging resources especially salmon and caribou herds like the Mulchatna and Western Arctic. We are committed to continuing ongoing dialogue at the local, statewide, and federal levels.

2. Federal Subsistence Eligibility for those Relocated due to Natural Disasters

“The Council believes 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 be granted special permission to continue to qualify to hunt, trap, and fish under Federal subsistence regulations while their homes and communities are rebuilt or relocated. We ask the Board to ensure these families retain their eligibility, and to work with the Secretaries if needed.”

Response:

The Board is following the impacts of Typhoon Halong on those federally qualified subsistence users displaced by such an extreme event. Federal agencies, State, and Tribal partners are working to provide some support to these rural Alaskans who are currently living in an unfamiliar urban environment. Local organizations are coordinating southcentral based subsistence opportunities, gatherings, and youth programs for the victims of Typhoon Halong, and federal and State agencies have issued permits (bird egg collection) in response to special requests. Federal agencies are also working to confirm if temporarily relocated rural residents can retain their federally qualified subsistence user status. Furthermore, Individual Assistance and Public Assistance programs through the State and the Federal Emergency Management Agency can reimburse individuals and communities for the replacement of lost and damaged subsistence equipment and infrastructure. Additional funding resources and potential donations are being pursued as well. We will keep your Council updated as we learn more.

3. Delays in Elevation of Council Correspondence and Lack of Engagement

“This remains an ongoing issue. Council letters requesting elevation are often significantly delayed in transmission, and there is frequently no reply or follow-up discussion from the Secretaries’ offices after they have been sent. The Council puts a lot of effort and time into writing letters and raises important subsistence issues, but we are left wondering if concerns are being heard.

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 the Board’s jurisdiction and require the Secretaries’ attention.”

Response:

The Board appreciates the Council raising this concern and agrees that delays in elevating Council correspondence and the lack of follow-up from the Secretaries’ offices remain an

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ongoing issue. We recognize the effort the Council puts into developing these letters and understand the frustration when it is unclear whether concerns are being heard.

The Board acknowledges that some delays were due to the significant number of vacant positions within OSM and Departments-wide, which affected the timeliness of processing and transmitting Council correspondence. We are sorry for the impact this has had on communication and on the Council's ability to receive timely responses.

We are pleased to report that OSM has now implemented a more efficient and streamlined internal tracking and review system for Council letters. This new process is designed to reduce bottlenecks and ensure that correspondence moves more quickly through review and elevation to the Secretaries. Please let the Board know if you notice any changes.

Additionally, now that OSM is part of the Office of the Secretary, the Board is hopeful that the elevation of critical issues to the Secretaries will improve, including more consistent acknowledgment and follow-up from the Departments of the Interior and Agriculture.

To further strengthen communication, the Board plans to request an annual standing meeting with the Secretary or their immediate staff. This would provide a dedicated opportunity for direct dialogue on major subsistence issues that fall outside the Board's jurisdiction and require Secretarial attention and would allow supporting documents to be shared in real time.

The Board is committed to improving communication between the Councils, OSM, the Board, and the Secretaries, and we appreciate the Council's continued engagement and patience as these improvements take effect.

4. Council Comments on the Secretarial Review of the Program

"The Council would appreciate the Board reviewing the full comments we submitted for the Secretarial review (see Enclosure). We commented on each of the seven topics identified in scoping documents, and also included additional topics we believe require the attention of the Board and the Secretaries. A few issues that we highlighted included the need for:

- *Council member compensation*
- *improvements to the correspondence process and communication between the Councils, Board, and Secretaries*
- *interjurisdictional, ecosystem-based management of salmon*
- *co-management as a standard for all resources*
- *increased outreach and education about the dual management system*
- *better alignment of State and federal regulatory cycles*
- *regulatory maps that include Native corporation lands and Native allotments*
- *more signage to clarify federal-state jurisdictional boundaries on the landscape"*

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Response:

The Federal Subsistence Management Program (Program) has benefitted from several previous reviews by the Secretaries of the Interior and Agriculture in its relatively short history. Regardless of what initiated the reviews, the results have always included thoughtful comments on the importance of the Program, concerns about the Program, and changes that could be implemented to improve the Program. The current review has continued in this tradition, and the Board is exceptionally thankful to each of the Councils for the wisdom that they have shared both regarding the seven identified topics as well as for the additional topics that you felt needed attention.

Within these additional topics, your Council and others have identified short- and long-term issues that need to be addressed. Some of these are long-standing issues, such as improving correspondence or Council applications processes, while others are more recent developments, such as updated maps that also show Native Corporation lands. The Board has requested that OSM provide us with a summary of the issues identified in these Council comments divided into categories that will allow us to determine those we can directly affect in the near future, those we can affect in the long term, and those which will require attention from a Secretarial level.

Please accept our thanks for highlighting these items. We look forward to further discussions and making progress.

The Board wants to thank the Council for sharing information in your FY-2025 Annual Report on another issue significant to the Council – the request to the U.S. Fish and Wildlife Service and to the Alaska Department of Fish and Game to form a Mulchatna and Kilbuck Caribou Herds Working Group. Please continue keeping us informed on this matter.

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 Yukon-Kuskokwim Delta Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

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cc: Yukon-Kuskokwim Delta 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

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