



Federal Subsistence Board

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



In Reply Refer To:
OSM.F26030

Jack Reakoff, Chair
Western Interior Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Reakoff:

This letter responds to the Western Interior Alaska 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. 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.

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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 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.

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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."

Response:

The Board recognizes the serious, perennial challenges subsistence salmon fisheries face in the absence of coordinated interjurisdictional management. 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 requests 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, OSM hosted a much-requested workshop with Council Chairs regarding the Alaska Salmon Crisis prior to the Board's 2026 summer work session that took place August 4-5. During this workshop, the Chairs had the opportunity to hear a presentation from the Solicitor's office and exchange information on salmon issues. The Board will 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 the Interior and Department of Commerce (NOAA NPFMC).

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

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Interior, such as the Yukon River bridge or hub airports, to conduct hunting compliance checks.”

Response:

The Board appreciates the Council’s continued attention to the serious reports of wanton waste and other potential hunting violations occurring across the region. We understand the concerns raised regarding suspicious aircraft activity, improper handling and disposal of game meat, and other troubling behaviors that undermine both conservation and the values of subsistence users.

Despite shrinking budgets across the Departments of the Interior and Agriculture, staff are using the information you have shared to strengthen and better coordinate law enforcement efforts. For example, the National Park Service recently hired a new law enforcement officer for Gates of the Arctic National Park and Preserve, freeing up other Northern hub staff to patrol additional park units.

Specific to the Dalton Highway Corridor, a heavily utilized access point in the Interior, the Bureau of Land Management no longer has jurisdiction for enforcement within the Corridor. The Corridor is under State of Alaska jurisdiction resulting from DOI’s land transfer that conveyed 1.4 million acres of land along the Dalton Highway Corridor to the State of Alaska. Concerns and reports of wanton waste occurring within this area will need to be communicated to the State of Alaska. Continuous input from Council members will help agencies work with partners to refocus enforcement priorities across Western Interior lands and waters.

Regarding the Council’s recommendation for additional check stations, the Northern Interior National Wildlife Refuge Complex, which includes the Koyukuk, Nowitna, Innoko, and Kanuti areas, puts forth considerable effort each fall to staff a check station along the Nowitna River. However, setting up and running these stations requires substantial time, funding, and personnel. As staffing levels have decreased over the years, the U.S. Fish and Wildlife Service (FWS) is hopeful that future hiring opportunities will enable them to maintain the check station’s operations moving forward, as this support is crucial for sustaining these efforts.

The FWS operates the Nowitna check station under a Memorandum of Understanding with the Alaska Department of Fish and Game (ADF&G), which supplies the necessary forms, permits, and reporting structure. Establishing additional federal check stations to support enforcement of State hunting regulations would depend on similar agreements and clearly defined authorities. To our knowledge the Nowitna check station is the only federally operated check station in Alaska.

Given these complexities, the Council could invite relevant federal and State managers to a future meeting to discuss the feasibility of establishing additional check stations at heavily used access points such as the Yukon River bridge or hub airports. In the meantime, the Interagency Staff Committee can gather more information on establishing check stations from federal agencies and the State.

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The Board shares the Council's commitment to addressing wanton waste and improving compliance, and we support the Council's recommendation for increased funding for Department of Interior enforcement programs, filling vacant enforcement positions, and strengthening working relationships between federal officers and their State counterparts. We recognize that Alaska is vast and enforcement resources are limited, but we agree that more must be done, and we remain committed to working with the Council and agency partners to improve protection of subsistence resources.

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."

Response:

The Board appreciates the Council's recommendation and acknowledges the longstanding need for a Wildlife Resource Monitoring Program (WRMP). We agree that a WRMP would provide essential information to address many of the biological data gaps affecting subsistence wildlife resources across Alaska. The Board also recognizes the Council's concern that, unlike the Fisheries Resource Monitoring Program established decades ago, a comparable program for wildlife has never been developed.

Section 812 of Title VIII of the Alaska National Interest Lands Conservation Act, codified at 16 U.S.C. § 3122, says that the Secretary shall, among other things, undertake research on fish and wildlife and subsistence uses on the public lands. This statutory mandate underscores the importance of a structured and responsive research program, and of the creation of a WRMP could assist the Federal Subsistence Management Program in meeting this obligation for terrestrial resources. The individual land managing agencies undertake a great deal of biological research related to wildlife management; however, WRMP would fill data gaps that remain.

The Board agrees that the framework provided by the existing Fisheries Resource Monitoring Program offers a strong foundation from which a WRMP could be developed with only modest modifications to support terrestrial research. However, the lack of dedicated funding and

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staffing remains the primary impediment. As the Council noted, the need is clear; what is missing is the financial capacity to implement the program. Current shrinking budgets across the Departments of the Interior and Agriculture present significant challenges to initiating new programmatic commitments, including a WRMP.

While the Board does not have authority over the development of the annual appropriations for the Office of Subsistence Management, the Council can convey its concerns to the Secretaries of the Interior and Agriculture through a formal letter transmitted via the Board. The Board also encourages coordination with other Regional Advisory Councils that have expressed similar concerns, as a joint Council approach may further emphasize the statewide importance of this issue.

The Board remains committed to supporting the Council's priorities to the fullest extent of its authority and will continue to advocate for the research and information necessary to maintain meaningful subsistence opportunities for rural Alaska residents.

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."

Response:

The Board appreciates your Council's initiative in writing this management strategy and recognizes the effort that went into developing it. Thank you for the depth of knowledge you have shared. The Council is an essential advisor to the Board, and we will consider your recommendations and this management strategy when making Federal subsistence regulatory decisions affecting sheep in the Western Interior Region.

Further we acknowledge the efforts of the National Park Service's Gates of the Arctic Subsistence Resource Commission (SRC) in helping to finalize this strategy. In April 2026, the

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Gates of the Arctic SRC approved the “Hunting Plan Recommendation” built on the strategy you developed and submitted it to the Secretary of the Interior and the Governor of Alaska to initiate the Alaska National Interest Lands Conservation Act Section 808 process. As a part of this process, the final “Hunting Plan Recommendation” will be presented to the Council at your fall 2026 meeting for your review and approval.

In addition, OSM commits to reference this strategy when analyzing regulatory proposals concerning Dall sheep in your region. OSM has also distributed your strategy to the federal agencies on the Board, and it is available to the public on our website. However, the Board has no authority to direct individual governmental agencies to follow this or any other management strategy. These responsibilities fall to agencies like ADF&G and other land managing bureaus. The Board recommends the Council approach land managers directly with how these strategies might be used in their regulatory frameworks.

The Board wants to thank the Council for sharing information in your FY-2025 Annual Report on other issues significant to the Council. Thank you for your information on and evaluation of current and anticipated subsistence needs for salmon, whitefish, Northern Pike, moose, caribou, black and brown bears, and wolves, as well as observations of weather patterns and their influence on caribou and other animals. The Board hears your concerns regarding Ambler Road project, Chinook moratorium and lack of consultation and transparency by the State of Alaska, and frustration over lack of action or forward movement in protecting regional subsistence resources. Lastly, thank you for letting us know about the productive joint meeting with the Eastern Interior Alaska Subsistence Regional Advisory Council. The OSM Director will prioritize these types of joint meetings whenever funding and staff availability allow for it.

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 Western Interior Alaska Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

cc: Western Interior Alaska Subsistence Regional Advisory Council

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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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