



Federal Subsistence Board

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



In Reply Refer To:
OSM.F26033

Robert C. Wright, Sr., Chair
Eastern Interior Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1101 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Wright:

This letter responds to the Eastern 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. 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.*

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- *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.”

Response:

The Board acknowledges the Council’s concerns regarding delays in elevating correspondence and the challenges this has created for addressing time-sensitive subsistence issues. We sincerely apologize for the lengthy delays in transmitting Council letters to the Secretaries. The Office of Subsistence Management (OSM), which provides administrative support to the Federal Subsistence Management Program, has been operating at approximately 70% capacity, and with the change in administrative processes in the Department of Interior, the routing process for Council letters required a full review and re-establishment. The good news is that the new routing procedures are now in place, and several elevated Council concerns are currently under review by the Office of the Secretary.

Internally, OSM has also streamlined the Council correspondence review process and is establishing a new system to ensure that OSM tracks the letters addressed to Board agencies. OSM is also committed to ensuring letters addressed to the Board are acted upon as early as practicable. As the Council may have noticed, regular updates on Council correspondence have been added to Board meeting agendas over the past few years to improve transparency and accountability.

The Interagency Staff Committee discussed the development of a Board correspondence standard operating procedures and brought it to the Board’s attention at the August 2026 summer work session.

Regarding broader engagement on major subsistence issues that fall outside the Board’s direct authority, the Board agrees that improved coordination with the Secretaries and other agencies is essential. The Board will request regular (annual) meetings between the Board and the Secretary or their representatives. This would provide a formal venue for discussing pressing issues, receiving direct guidance, and clarifying the Board’s ability to advocate on behalf of federally qualified subsistence users in cross-jurisdictional arenas such as the North Pacific Fishery Management Council and the Alaska Board of Fisheries.

The Board appreciates the Council’s thoughtful recommendations and will continue working toward more timely communication, clearer policy guidance, and stronger engagement across all levels of the Program.

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 and brief them on the history of this issue. 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 requests 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.

The salmon crisis on the Yukon River is having a domino effect on other fisheries, in particular the Copper River salmon fishery, which is absorbing displaced federally qualified subsistence users and non-federally qualified users who would have historically fished on the Yukon River. This increased pressure on Copper River salmon needs to be closely monitored and the fishery must be managed conservatively to prevent negative impacts to the long-term sustainability of those stocks. We need to do all we can to not repeat the past management mistakes of the Yukon River on the Copper River.”

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 do not support effective subsistence management of the entire salmon life cycle and encouraged Council suggestions.

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Since that time, the Board has 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 of the Interior and Agriculture in March 2026.

To continue this important discussion, on August 3, prior to the Board's 2026 summer August 4-5 work session, OSM hosted a much-requested workshop with Council Chairs regarding the Alaska Salmon Crisis. As noted in our previous reply, the Board is committed to requesting an annual meeting with the Secretaries to discuss important subsistence issues such as this 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 NPFMC. 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 the Interior and Department of Commerce (NOAA NPFMC).

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

"The Council requests that the Tanana Chiefs Conference Tribal Resource Stewardship Department, Association of Village Council Presidents Natural Resources 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. Both the Western Interior and Yukon-Kuskokwim Delta Councils supported this action at their Winter 2026 meetings."

Response:

This request can be addressed through an update to the existing Delegation of Authority letter to the U.S. Fish and Wildlife Service's Fisheries and Aquatic Resources Branch Manager for Yukon River drainage fisheries management. The Council's request to revise the regional Delegation of Authority letters issued to wildlife managers has already been completed. OSM is updating the standard Delegation of Authority letter template and these additional contacts can be incorporated when the Yukon River fisheries management delegation letter is reissued. The Board notes that although these entities are not currently listed in the letters, Yukon River in-season manager Holly Carroll has maintained regular communication with them throughout the year regarding management planning, in-season actions, and post-season reviews.

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

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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.”

Response:

The Board recognizes and appreciates the significant work your Council has undertaken over the years to develop hunter ethics education initiatives, including pilot projects aimed at reducing user conflicts. These efforts demonstrate a strong commitment to supporting respectful, safe, and sustainable subsistence practices. The Board also acknowledges that with diminishing resources, declining caribou populations and collapsing salmon returns, and increasing pressure on shared resources, the need for improved hunter ethics outreach for all user groups will remain a priority across the state.

While the Board agrees that reducing hunter conflict and improving hunter ethics is critically important, it must also note that it does not have the authority to direct Board member agencies to prioritize funding or staff time for specific initiatives. Additionally, OSM’s budget was reduced by \$2 million for fiscal year 2026, and the office continues to operate at roughly 70% capacity. Taken together, these factors prevent the Program from taking on additional efforts at this time.

It is possible that external partners may take an interest in supporting a statewide hunter-ethics education effort, and the Board is open to exploring such opportunities. The Board will also request that OSM leadership raise the topic during their monthly coordination meetings with the Alaska Department of Fish and Game, and during the next set of Tribal consultation events. Non-government organizations have historically supported similar initiatives, and future collaboration with outside entities may offer a productive path forward.

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 (Enclosure 1), and our additional comment submitted during the comment period extension (Enclosure 2). 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*

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- *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*
- *Impacts of excessive international and domestic hatchery fish on wild salmon stocks*
- *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."

Response:

The Federal Subsistence Management Program (Program) has benefited from several 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.

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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 Eastern Interior Region are well represented through your work.

Sincerely,

Anthony Christianson
Chair

cc: Eastern Interior Alaska 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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