



Federal Subsistence Board
Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199



In Reply Refer To:
A25035

Nov 24 2025

Kimberly Strong
President
Chilkat Indian Village
32 Chilkat Avenue Klukwan, Alaska 99827
HC60 Box 2207, Haines, Alaska 99827

Dear President Strong,

Thank you for your June 16, 2025 letter of request for federal intervention regarding the proposed timber sale on Chilkat Ridge. We are sympathetic to your concerns that this timber project may interfere with access to critical fish and wildlife resources, compromise local habitat, and impact the protection of pending land allotments, ultimately affecting the subsistence way of life.

The authorities you identified as possibly helpful in your request for action from the Federal Subsistence Board (Board) require a federal nexus. As a general matter, federally reserved water rights may be enforced to implement the subsistence priority as to waters within and immediately adjacent to federal reservations, but not as to waters upstream and downstream from those reservations. The Tsirku River is not within or immediately adjacent to a conservation system unit, such as Glacier Bay National Park or the Tongass National Forest, and it cannot be designated as such through any known mechanism, including the suggestions outlined in your request. 43 CFR 51.10(d)(4)(xix), which provides limited authority for the Board to recommend including an area or an interest in an area to the Federal Subsistence Management Program, does not apply because the Tsirku River is not within or adjacent to any federal Conservation System Unit.

You have also requested the Board conduct a subsistence impact analysis; however, in this instance, Section 810 of ANILCA does not apply. Section 810 requires that federal agencies evaluate potential effects to subsistence uses and needs for any federal intent to “withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands.” In this instance, no federal agency is making a decision. The decision is being made by a state agency. ANILCA 810 has no application to state agency decisions.

The Board can act only through the narrow scope of authority delegated in regulation to assist in implementing Title VIII of ANILCA. The Secretary of the Interior and the Secretary of Agriculture established the Board and delegated to it the authority for administering the subsistence *taking and uses* of fish and wildlife on federal public lands and the associated promulgation of subsistence regulations. The Board's arena of action is regulatory in nature and primarily responsive to requests to change subsistence hunting and fishing regulations on federally managed lands only.

In summary, you are requesting the Board to act in a situation where it does not have the authority to do so. Since this is a state matter, we encourage you to continue working closely with state agencies to find resolution and accommodation. We can also offer you a staff-to-staff meeting on the Federal Subsistence Management Program, our regulatory cycles, and public process.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Christianson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthony Christianson
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Office of Subsistence Management
Senator Jessie Keil, Alaska State Legislature
Representative Andi Story, Alaska State Legislature
Administrative Record