

Northwest Arctic Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

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FEBRUARY 18 2026

Anthony Christianson, Chair
Federal Subsistence Board
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503

Dear Chair Christianson,

On behalf of the Northwest Arctic Subsistence Regional Advisory Council (Council), I am writing to provide comments for the Federal Subsistence Management Program (Program) Review, as published in 90 FR 57941. We appreciate the opportunity for Council members to share perspectives based on direct experience with Federal subsistence management in our region.

The Council held its public meeting in Kotzebue on January 7-8, 2026, during which members received a briefing on the public scoping process being conducted by the Secretaries of the Interior and Agriculture (Secretaries) to evaluate whether the Program is meeting the needs of subsistence users. The Council respectfully submits the following comments for consideration.

1. Move of the Office of Subsistence Management to the Office of the Assistant Secretary for Policy, Management, and Budget

The Council viewed the move of the Office of Subsistence Management (OSM) from the U.S. Fish and Wildlife Service to the Office of the Assistant Secretary for Policy, Management, and Budget as a positive and necessary change that allows subsistence users to have a more direct line of communication with Interior Department leadership. Reversing this move may lead to unnecessary instability of the Program. Council members stressed that the need to protect subsistence resources has become ever more urgent as these resources become increasingly scarce and their management requires stronger, more direct Federal oversight.

2. Criteria for Regional Advisory Council Membership

The Council expressed concern over the extensive length of the current Council member nomination and appointment process, which increases the risk of Councils losing potential members to other commitments. This can impact the ability of the Council to establish a quorum and conduct necessary business. The Council recommended establishing an expedited process

for incumbent re-appointments and the ability to have standing alternates. Incumbents have already been interviewed, vetted, and are trained and experienced members. Standing alternates can help ensure that quorum is met when a seated member is unable to attend a meeting.

The Council would like to ensure that as many communities as possible in the region have a voice on the Council and recommends that OSM engage more with regional Tribes and other entities to encourage applications and broaden representation. Additionally, the Council would like OSM to seek information from the Tribes to better understand any barriers with participation. Council membership expertise is a key pathway for Traditional Ecological Knowledge (TEK) to reach the Federal Subsistence Board (Board) and Federal agencies. Increasing the geographic distribution of membership and participation within the region would strengthen the Council as well as TEK input on important subsistence issues.

Council members tend to ‘wear many hats’ and serve on various other committees and working groups, including being elected to local State of Alaska Fish and Game Advisory Committees (ACs), only one of which still functions in this region. The Council would like all the local ACs to become active again as many have not met for multiple years, which has made this Council even more vital for protecting critical resources and serving subsistence users in the region. Council meetings are broadcast on the local radio station, KOTZ 720 AM/KINU FM89.9, across the region. This broadcast helps those unable to attend meetings in person to easily listen and stay informed.

3. Membership of the Federal Subsistence Board

The Council was very pleased to hear of the additional Tribal seats added to the Board, which provides an additional and crucial pathway for TEK to inform management decisions. The Council would like to see membership expanded further to ensure a public seat is available for each of the Program’s ten Regional Advisory Council regions to ensure that all regional perspectives are fully represented on the Board. Therefore, the Council recommends maintaining the current public seats on the Board, as these seats provide subsistence users a more meaningful role in Federal subsistence management and bring local hands-on expertise to the decision-making that directly affects these users.

4. Federal regulations and State regulations for duplication and inconsistency

The Council attempts to ensure that, whenever possible, the State and Federal regulations mirror each other so that subsistence users do not inadvertently break the law by unknowingly crossing an invisible boundary, harvesting too many of a species, or using a method of harvest that is acceptable under one set of rules but unacceptable under another. Many Council members also participate in the State advisory system and work to ensure that this replication of regulation occurs where it makes sense to do so.

However, the Council stressed that they do not want to lose the rural priority guaranteed under the Alaska National Interest Lands Conservation Act (ANILCA) Title VIII, which is why Federal regulations must sometimes differ from State regulations. The State does not recognize rural priority; therefore, these differences must remain where they are necessary to protect the

priority, especially when resources are limited. Federal and State systems have separate laws, mandates, and responsibilities, and the Federal government must continue to honor its commitments; another such example is government-to-government obligations.

Currently, the Federal and State regulatory cycles do not line up, and the Council expressed concern over the length of the State's current three-year cycle. The Council believes this cycle should be shorter and is not reactive enough to caribou population declines. The Northwest Region is heavily dependent on caribou to maintain a subsistence lifestyle, and this decline is of great concern.

5. Special Actions

Dwindling subsistence resources have become a critical concern across the State, and the ability to make flexible, out-of-cycle actions is increasingly important to ensure timely management responses. The Council strongly supports and recommends retaining the current special action process to allow this flexibility. Action can then be taken at the next regulatory cycle as needed.

For example, this region is highly dependent on caribou, which have experienced significant population declines. Special actions are a key tool for responding quickly to changes in caribou availability for subsistence users.

6. Role of the State and the Alaska Department of Fish and Game in the Federal Subsistence Management Program

The Council expressed strong support for effective communication between the State of Alaska Department of Fish and Game (ADF&G), the Program, and the Board. The Council appreciates receiving reports from the ADF&G on many different topics that are of importance to the region. The Council recommends that the State retain its current role, ensuring the Board remains focused on Federal subsistence issues and priorities.

7. Board's process for rural determinations

The Council emphasized that preserving the rural priority guaranteed under ANILCA should be the Board's top priority, and that maintaining rural priority is essential for protecting subsistence rights. Additionally, the Council was pleased that the Board moved away from the population-based approach to rural/nonrural determinations. The Council supports and recommends retaining the more holistic method, which better reflects community characteristics and protects rural status even as populations fluctuate.

8. Other topics relating to Federal subsistence management

a. Caribou Conservation and Enforcement

The Council expressed repeated concern over declining caribou numbers and emphasized that caribou are extremely sensitive to disturbances. The Council recommends increasing enforcement presence in the region during hunting season. There are not enough enforcement

officers, and a stronger, more consistent enforcement presence is needed to ensure regulatory compliance by hunters.

b. Wildlife Management Priorities

The Council refers to earlier comments in this letter concerning dwindling caribou numbers and recommends more focused attention and funding for research on topics concerning this population decline. Additional information is needed about caribou migration, habitat limitations, migration patterns, as well as about predator population dynamics.

The Council appreciates your assistance in relaying these comments to the Secretaries for their consideration. The Council values the opportunity to participate in the scoping process and welcomes continued engagement as the Program review moves forward. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Thomas Baker
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Northwest Arctic Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record