

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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OSM.R26031

Anthony Christianson, Chair
Federal Subsistence Board
c/o Office of Subsistence Management
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson:

The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2025 annual report to the Federal Subsistence Board (Board) under the provisions of Section 805(a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). At its public meetings held on January 20-22, 2026, the Council identified concerns and recommendations for this report. The Council approved this annual report at its March 17-19, 2026 meeting. The Council wishes to share information and raise a number of concerns dealing with implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Yukon-Kuskokwim Delta Region.

1. Struggling Salmon and Caribou Remain Priority 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.

2. Formation of a Mulchatna Caribou Herd Working Group

The Council requests that a Mulchatna Caribou Herd Working Group be established to monitor the herd status and collaborate on rebuilding efforts. The Western Arctic Caribou Herd Working Group is a good model. We request that the Board ask the Togiak Refuge Manager to work with the Alaska Department of Fish and Game to establish a working group that includes representatives from the Regional Advisory Councils and Advisory Committees in the range of the herd. It is very important that local people are part of the working group, and that State and Federal agencies work together on a management and rebuilding plan.

3. 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.

4. 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 once they are sent, there is frequently no reply or follow-up discussion from the Secretaries' offices. The Council puts in a lot of effort and time into writing letters and raise 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.

5. 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 lands
- more signage to clarify federal-state jurisdictional boundaries on the landscape

The Council appreciates the Board's attention to these matters and the opportunity to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. The Council looks forward to continuing discussions about the issues and concerns of subsistence users in the Yukon-Kuskokwim Delta Region. If you have any questions regarding this report, please contact me via Brooke McDavid, Subsistence Council Coordinator, Office of Subsistence Management, at brooke_mcdavid@ios.doi.gov or 1-800-478-1456 or 907-891-9181.

Sincerely,

Jacqueline Cleveland
Chair

Enclosure: YKDRAC Comments for Secretarial Review (2/25/2026)

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Interagency Staff Committee
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record