Eastern Interior Alaska Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
R26085

OCT 28 2026

Kara Moriarty
Senior Advisor for Alaska Affairs
Office of the Secretary
4230 University Drive, Suite 300
Anchorage, AK 99508

Dear Ms. Moriarty,

I write on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to request that you relay an additional comment from the Council to the Secretaries of the Interior and Agriculture (Secretaries) regarding the Secretarial review of the Federal Subsistence Management Program (Program).

The Council met in Fort Yukon October 13-15, 2026, and voted to provide the following additional comment.

Reporting on the status of subsistence in Alaska as required by ANILCA Title VIII Section 813

In our previous Secretarial Review comments, we highlighted the significant need for a comprehensive socio-economic analysis of subsistence in Alaska over time to effectively convey the significant declines in many subsistence resources across the state and the severe impacts of the corresponding declines in subsistence harvests to rural Alaskans (see Enclosure 1, Comment 10a). Since the time we submitted those previous comments, the Council has become aware of ANILCA Title VIII Section 813, which instructs the Secretaries to report to Congress on the status of subsistence in Alaska every three years (see Enclosure 2 for the language in Section 813).

To the Council's knowledge, these reports have not been completed in recent decades, and we are interested to know if they ever were completed because we cannot locate any previous reports. The Council feels strongly that Section 813 reporting must be implemented as mandated in ANILCA. There is a significant lack of awareness of the scope and importance of subsistence

in Alaska, and comprehensive monitoring of subsistence trends in Alaska by the federal government is non-existent.

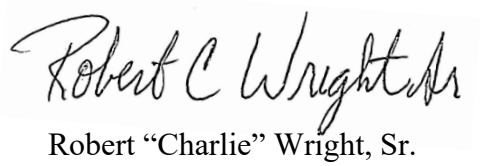
Title VIII of ANILCA (Section 805) gave the ten Subsistence Regional Advisory Councils authority to prepare annual reports to the Federal Subsistence Board that highlight subsistence trends and concerns in each region. The information in the Annual Reports rarely makes it beyond the Federal Subsistence Board, which has limited authority to act on large scale, interjurisdictional matters, or programmatic needs. The Annual Reports could serve as an integral component of Section 813 Reports by the Secretaries. However, in addition to the traditional and local expertise that Council Annual Reports contain, there must also be comprehensive biological and socio-economic analyses as well. Section 813 Reports would require dedicated funding for new analyst positions within the Secretaries' Offices or the Office of Subsistence Management to analyze and compile the significant amount of information and data about subsistence from across the state. This would include data on numerous species of large and small game, bird, fish, and plant species that are utilized for subsistence across a geographically large state, as well as data on other aspects of subsistence that permeate so many facets of life in Alaska including the economy, culture, food security, health, and overall well-being. The first iteration of a Section 813 report would be a large undertaking, but if data were then compiled and analyzed on an on-going basis; thereafter, the report could be more easily updated in later versions once the template was established.

Not only are Section 813 Reports required by law, but they also serve an important accountability function by ensuring that the federal government and elected officials understand the realities facing our rural communities and the need for action to protect our resources and subsistence lifeways. During the Federal Subsistence Board's Summer 2026 Work Session, it was observed that there was not a common understanding among decisionmakers of how long Yukon River communities have gone without a subsistence Chinook (King) Salmon fishery. This underscored the importance of ensuring that the realities facing rural communities continue to be communicated to decisionmakers on regular basis. We are interested in finding ways to increase knowledge, empathy, and understanding among the Secretaries and their staff about this deep cut to cultural continuity and to physical and mental health for thousands of people. Section 813 Reports would help government leadership make more informed decisions and help provide justifications for funding allocations to aid in subsistence resource management and recovery.

In conclusion, the Council requests that the Secretarial Review evaluate the extent to which ANILCA Title VIII monitoring and reporting requirements have been implemented and identify any gaps, including through an in-depth review of the history, implementation, and effectiveness of Section 813 reporting.

The Council appreciates your assistance in relaying this comment to the Secretaries for their consideration. The Council welcomes continued engagement as the Program review moves forward. If you have any questions or would like to follow up, please contact us through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Robert “Charlie” Wright, Sr.
Chair

Enclosures:
1. WI-EIRAC Comments on Secretarial Review (2/18/2026)
2. Copy of ANILCA Section 813

cc: Federal Subsistence Board
Interagency Staff Committee
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record

Western Interior Alaska and Eastern Interior Alaska
Subsistence Regional Advisory Councils
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
OSM.B26015

February 18 2026

Anthony Christianson, Chair
Federal Subsistence Board
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

We write on behalf of the Western and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to request that you relay our comments to the Secretaries of the Interior and Agriculture regarding the Secretarial review of the Federal Subsistence Management Program (Program).

The Councils met in Fairbanks for a joint public meeting on December 17, 2025, to discuss the topics outlined in the Secretarial review, along with other agenda items. During this meeting, the Councils developed the following comments for submission to the Secretaries. The Eastern Interior Council also provided additional comments during its individual meeting on December 18, which are noted separately at the end.

1. **Move of the Office of Subsistence Management (OSM) to the Office of the Assistant Secretary for Policy, Management, and Budget (OS-PMB)**

The Councils believe that OSM should remain within OS-PMB. Although the move is still too recent for a full evaluation, the Councils generally support the elevation of OSM within the Department of the Interior. Because OSM works with all land-managing agencies in Alaska, it is not appropriate for it to be located within a single agency. The Councils also noted this move was an outcome of a previous scoping process and was strongly supported by Tribes and many rural subsistence users. It required substantial administrative effort to complete and should not be repeated unnecessarily.

While the Councils support OSM's new administrative placement within the Department of the Interior, several post-transition issues still need to be worked out. The Councils request increased administrative support to the Program, the filling of vacant positions, and consideration of adding new ones. Without adequate funding and staffing, OSM cannot effectively implement the Program and respond to subsistence user needs. Additionally, there is a critical need to develop more efficient and transparent two-way communication protocols are needed between the Councils, Federal Subsistence Board (Board), and Secretaries' offices. We will expand on this topic further in section 8c of our comments.

2. **Criteria for Regional Advisory Council membership**

The Councils are satisfied with the current membership criteria. However, member recruitment remains challenging because of the significant time commitment required to serve on a Council and lack of monetary compensation to Council members. All Councils across the state have long advocated for additional Council member compensation beyond the per diem provided for attending meetings (see Enclosure 1). Life in rural Alaska is extremely expensive, and many people cannot afford to take time off work to volunteer for Council service. Providing actual compensation would increase both the incentive to serve and the ability to participate by offsetting the income members lose when attending meetings.

The Councils also discussed the 70/30 ratio between user groups represented on the Councils and noted that when sport/commercial users do not make up 30 percent of seats, it is simply because no applicants from that group applied. The Councils also believe that members should not have to choose between identifying as a subsistence user versus a sport/commercial user. Many rural subsistence users wear multiple hats and represent both user groups – for example, holding a sport fish license or running a trapline qualifies as sport/commercial use. Requiring applicants to select only one group to represent is unfair. There also seems to be confusion that an applicant must hold a professional fishing or hunting guide or transporter license to qualify for a sport/commercial seat, which is not correct.

The Councils pointed out that many members on every Council also serve on State of Alaska Fish and Game Advisory Committees, giving them substantial familiarity with both the State and Federal regulatory processes. The Councils emphasized that the application process for the Councils does not need to mirror the State Advisory Committee process, and no benefits to doing so were identified.

The Councils also discussed options for broadening the definition of regional residency. Specifically, to allow individuals who were raised in a region and have extensive hunting and fishing experience there, but who have since moved to other communities for work or school, to continue serving on the region's Council where they grew up. The two Councils did not reach

consensus on this option and felt that it may better be considered on a region-by-region or case-by-case basis. The Councils stressed that any potential changes to residency requirement must be carefully scrutinized to ensure that the membership is not overtaken by non-rural representatives.

It was noted that the interview and application process for membership is very thorough and that appointed Council members are sufficiently vetted and proven to be well-qualified. However, the application and interview process is extremely redundant and cumbersome, requiring applicants to repeat the same information on forms and in interviews. Further, incumbents re-applying for another term must repeat these steps each time they re-apply for another term even when there is no new information to provide. Additionally, it also takes an excessively long time from the time when someone applies or is nominated to receive an appointment decision. The Councils encourage condensing and refining this entire process.

Lastly, the Councils emphasized the importance of age diversity on the Councils. Younger members are needed so they can learn the regulatory process and contribute new perspectives, while elders are needed as a key source of traditional knowledge which is critical to subsistence management.

3. **Membership of the Federal Subsistence Board**

The Councils strongly advocate that the current membership structure of the Board remain unchanged. We previously supported the recent addition of the three tribally nominated public members seats (see Enclosures 2 and 3). Prior to their addition, the Board composition was unbalanced, with more agency representatives than public members. The first-hand subsistence experience and traditional knowledge that public members bring is critical and essential to a well-informed Board and must be protected at all costs. Federal agencies experience frequent turnover, and agency heads are often new to Alaska or have only lived in urban parts of the state. It takes them a long time to get up to speed on subsistence issues and understand them, and by the time they do, they often move, restarting the cycle. Public members not only help maintain longer term continuity in membership, but they also facilitate a unique and important bottom-up approach to Federal subsistence management, as intended by the Alaska National Interest Lands Conservation Act (ANILCA):

> *...[T]he continuation of the opportunity for a subsistence way of life by residents of rural Alaska require that an administrative structure be established for the purpose of enabling rural residents who have personal knowledge of local conditions and requirements to have a meaningful role in the management of fish and wildlife and of subsistence uses on the public lands in Alaska*" (§801.5).

Agency representatives rely heavily on Interagency Staff Committee (ISC) members for support. These staff are critical for keeping Board members informed on the wide range of issues they must consider. We believe filling any vacancies on the ISC should be a high priority. At the time this letter was drafted, the Bureau of Land Management did not have a designated ISC staff member.

Perhaps even more concerning is the lack of adequate staff support for the public members of the Board. OSM currently has one Native Liaison who is expected to somehow support all 229 federally recognized Tribes across the state, as well as support six public Board members. This is impossible and requires immediate attention and resolution. Each public member should have staff support equal to that provided to agency members.

The Councils also highlighted the importance of maintaining a balanced geographic representation among the public Board members because of the unique subsistence practices, challenges, and cultures across different regions of this vast state.

4. **Federal regulations and State regulations for duplication and inconsistency**

The Councils acknowledged that the dual management system increases regulatory complexity and confusion for all user groups. Having two sets of regulations and separate "handy dandy" regulation booklets is not ideal, but the Councils do not see an easy way to reconcile this problem. State and Federal regulations will never be fully aligned, nor should they, because of differing mandates and the State's inability to recognize a rural priority. Despite this, the Councils feel that it would be worthwhile to explore potential options for combining" handy dandy" regulation booklets to make it easier for hunters, trappers, and fishers to more easily determine where they are eligible to harvest and what associated regulations apply. This will not be an easy task considering the differences in seasons, harvest limits, methods and means, hunt areas, and customary and traditional use determinations. Design options should be considered with the end user in mind and the aim to reduce confusion, not increase it. If it is not possible to develop a user-friendly combined regulation booklet, the Councils acknowledge that the current system may need to remain.

In general, the Council supports aligning regulations where possible to reduce confusion and inconsistencies, but this cannot be done through a blanket approach. Often, federal regulations provide additional opportunities for rural subsistence users beyond what is provided in State regulations, and this should be maintained and supported in accordance with ANILCA Title VIII.

The Councils feel strongly that more detailed maps are needed in the regulation booklets, not just online, that clearly show land ownership boundaries between State, Federal, and Native Corporation lands, as well as Native allotments. Current regulatory books do not show Native Corporation lands or Native allotments, and this contributes to ongoing trespassing issues across the state.

5. <u>Regulations governing special actions</u>

Special actions are critical for conservation. They are the only mechanism available to address issues that unexpectedly arise between the normal regulatory cycles. We urge the Secretaries not to change regulations governing special actions. Current regulations are very clear that special actions are for special circumstances when needed to "*ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons*" (43 CFR 51 §100.19). Further, Board policy requires consultation with the State of Alaska and the Chairs of affected Councils on all special actions. Additionally, except under true emergency circumstances, when time is critical, a public process is followed to gather additional input. Special actions are temporary in nature and may last at a maximum until the end of the current regulatory cycle.

The Councils want to highlight that special actions may be used more frequently now than in the past because resources are struggling and environmental conditions are fluctuating more than they ever have historically. As fish and wildlife populations approach critical levels, hunting and fishing management must become more active, precise, and conservative to ensure that subsistence resources and the opportunity to harvest them remain available into the future.

The ability to close Federal public lands, whether via special action processes or regulatory proposals, must also be maintained. At times, closures of hunting or fishing to all users are necessary when no harvest can be supported, and in other cases, closures of these activities must apply to a subset of users when only limited harvest can be supported. This is critical for conservation. ANILCA Title VIII Section 804 is very clear on the subsistence priority and application of closures. Closures first apply to non-federally qualified users, and then, if further restrictions are needed, apply to a subset of federally qualified subsistence users based on prioritization criteria.

Maintaining the Board's authority to implement closures is critical not only for conservation, but it is equally important that closures may be used as needed to ensure the continuation of subsistence uses. Special actions and closures to non-federally qualified users help ensure opportunities for rural subsistence users are prioritized before sport/commercial opportunities or opportunities for users that live in non-subsistence areas with less reliance on the resource. As animal populations decline and human populations increase, competition for resources grow and there is less to go around. When warranted, closures help ensure the rural priority that defines the Federal subsistence program.

The Councils support maintaining the current four-year review cycle for closures, though in some cases that timeline could be extended to reflect the time it takes for populations to recover. If recovery occurs more quickly than anticipated, proposals may be submitted in the interim to shorten the timeline.

6. **Role of the State and the Alaska Department of Fish (ADF&G) and Game in the Federal Subsistence Management Program**

The State of Alaska serves as a liaison to the Board, and the Board considers input from the State in all its decisions. State representatives also participate in the Interagency Staff Committee. The Councils feel this already constitutes a substantial and meaningful role and does not need to be expanded further. Additionally, the Councils emphasize that the State should not have deference in Federal subsistence management because it has consistently opposed subsistence protections. ANILCA clearly directs the Board to defer to the Regional Advisory Councils, and maintaining this is critical. The State does not recognize the rural subsistence priority. As such, it will never support closures to non-federally qualified users, even when such closures are necessary. The Alaska Boards of Fisheries and Game do not have a voting seat for a federal representative, so it would be inappropriate for the State to have a voting seat on the Board.

The Councils request renewal of the expired Memorandum of Agreement (MOA) between OSM and the State. When the State and Federal government are in conflict at higher levels, subsistence users on the ground bear the consequences. Despite differing mandates, collaboration is essential for effective dual management, and clear, mutually agreed upon guidance is needed. The Councils recognize that the State plays an important role in data collection and in providing biological and harvest data for use in federal proposal analyses and at Council meetings. This contribution is highly valued and significantly strengthens the Program's functioning and body of knowledge regarding our resource populations and their health and level of exploitation. Data sharing should be formalized through a renewed MOA.

7. **Board procedures on non-rural determinations**

The Councils believe the Board should defer to Regional Advisory Council recommendations on rural/non-rural determinations just as they do for other types of proposals. The Councils consider the current lack of deference to be inconsistent with ANILCA. There should be clear guidelines that define the circumstances when the Board can oppose Council recommendations on these determinations, and the process needs more transparency. The Councils are best positioned to consider these determinations because they have the most intimate familiarity and understanding of their regions and how these determinations affect subsistence users. We recommend revising this policy and procedure to ensure Council deference.

The Councils emphasized the need for very stringent criteria when considering any changes in community status from non-rural to rural. Liberalizing rural status would further threaten declining fish and wildlife resources and increase competition for truly rural communities with higher dependence on subsistence foods. ANILCA Section 804 criteria, in particular customary and traditional direct dependence upon subsistence resources and the availability of alternative resources, should be tied into rural/non-rural determinations.

The Councils also noted that as resources decline and human populations increase, there will be greater need to apply Section 804 prioritizations among federally qualified subsistence users. This is already happening, for example, with caribou accessible via the road system in the Eastern Interior and Southcentral regions.

Both rural/non-rural determinations and Section 804 prioritizations require thoughtful and in-depth analysis. They are difficult decisions that directly impact people's abilities to have a subsistence priority to harvest a resource and should not be rushed. The Councils recommend that Board procedures be forward-thinking and consider how policies might need to adapt as demographics and the environment continue to rapidly change.

8. Additional joint Council comments on other subsistence topics

a. Overall importance of Federal subsistence management – The Councils strongly emphasize the overall importance of the Federal Subsistence Management Program and the need to maintain it. The rural priority for subsistence on federal lands is integral for rural Alaskans' abilities to continue living a subsistence lifestyle, sustaining their cultures and traditions, and ensuring food security. ANILCA Title VIII was forward-thinking and contains a lot of wisdom that remains highly relevant today and is arguably even more important now, as resource scarcity becomes more pronounced.

b. Immediate meaningful action is needed to address the Western Alaska salmon crisis – Despite widespread recognition of the severity of the salmon crisis and its devastating impacts on the people of Western and Interior Alaska, neither the Federal nor State government has taken substantive or meaningful action to address it. The Councils and the people of our regions are exhausted from the endless fight to protect this vital subsistence resource and the culture, traditions, and identities tied to salmon. Efforts to hold the State of Alaska and the National Marine Fisheries Service accountable for prioritizing conservation and subsistence uses over commercial uses have largely failed. More research is not the answer; there is no time left to wait for action.

   We once again implore the Secretaries to help move this significant issue forward and find resolutions before it becomes too late to ever fish for Yukon River salmon again. Federally qualified subsistence users need the support of the Secretaries and the Solicitors to fix the siloed salmon management framework and replace it with a new interjurisdictional, ecosystem-based approach that prioritizes conservation and subsistence uses over commercial uses.

   Rather than restating what has already been written, we kindly and respectfully request review of the letters previously sent by our Councils on this issue, particularly the joint letter prepared by seven of the Regional Advisory Councils during the most recent All-Council

meeting (see Enclosure 4). The Councils would greatly appreciate the opportunity to engage directly with the Secretaries and/or their staff on these critical fisheries issues. Given the urgency, we suggest exploring opportunities for such engagement during the 2026 Board Summer Work session with the Board and Council Chairs.

9. Lack of replies or meaningful follow-up to correspondence and Annual Report topics –The Councils reiterate the need for focused attention on developing efficient and transparent two-way communication protocols between the Councils, Board, and Secretaries' offices. Regional Advisory Councils previously highlighted this issue at the 2024 All-Council Meeting, yet it remains unresolved even after OSM's move to OS-PMB (see Enclosure 5).

   The Councils send written correspondence via two means: letters and their Annual Reports. Councils regularly send letters to agencies represented on the Board and to the Board itself. Sometimes letters to the Board request elevation to the Secretaries when an issue falls outside the jurisdiction of the Board. Commonly, correspondence does not receive a timely reply or a reply at all, and requests to elevate or transmit correspondence are severely delayed or never completed.

   Related, ANILCA requires the Councils to develop Annual Reports identifying issues and trends in their respective regions, and the Secretaries delegated consideration of these reports to the Board. Yet, correspondence and Annual Reports rarely result in meaningful action on issues identified by the Councils. One underlying challenge is that the Board has limited jurisdiction and no authority to address many of the high-level interjurisdictional issues that are of critical importance to subsistence users. Another underlying challenge is inadequate staffing levels.

The Councils request that these shortfalls be addressed through the following actions:

1. Develop clear, written policies for Board and Board agency correspondence, similar to the Council correspondence policy.
2. 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 scope of the Board's authority but directly impact federally qualified subsistence users.
3. 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 that impact Yukon River salmon being addressed at the North Pacific Fishery Management Council or Area M deliberations at the Alaska Board of Fisheries meetings.

c. Location and accessibility of the open house and the timeline for submitting comments – The Councils question the decision to only have a 60-day scoping period and to hold just one open house during this timeframe. Sixty days is a very short timeframe given the overlaps with the end of the year holidays and several important resource management meetings. The location selected to hold the open house is the largest city in the state, yet no federally qualified subsistence users reside there, and changes to the Program would not directly affect those who live in the Anchorage area. Open houses and meetings should instead be held in rural areas and communities where federally qualified subsistence users live.

   The Councils request an opportunity to review and provide input on any draft recommendations that emerge from this scoping process before they are finalized and transmitted to the Secretaries. Additionally, if any rulemaking follows this scoping process, additional time should be planned for the comment period, broader outreach and engagement should be conducted, and all ten Regional Advisory Councils should have the opportunity to meet together to discuss the issues and proposed actions and to develop recommendations.

d. Communication with Council members during government shutdowns – In the event of future government shutdowns, the Councils encourage greater flexibility for OSM staff to be able to communicate with Council members, especially when a shutdown impacts a meeting cycle. Being left in limbo about whether meetings will occur until the very last minute is stressful. At the very least, an essential staff member should send out regular updates to all Council members so that we remain informed of what is happening, and a clear timeline should be communicated for when decisions about meetings will be made.

e. Need for co-management of resources – The Councils continue to advocate for putting co-management into practice to increase the direct involvement of rural residents and Tribal organizations in resource management and research. Co-management builds capacity, increases trust in the system, and improves resource management outcomes by including broader perspectives and expertise. There are successful examples that exist, like those involving the Kuskokwim Inter-tribal Fish Commission and Ahtna Intertribal Resource Commission, and these models can be replicated in other areas of the state.

10. Additional Eastern Interior Council comments (discussed during December 18th individual meeting)

a. Need for DOI and Department of Agriculture (USDA) to publish a thorough analysis of the socio-economic impacts of declining subsistence resources to federally qualified subsistence users and food security – The Council believes there is a large disconnect with higher levels of government, particularly in the Departments of the Interior and Agriculture, regarding the severe food insecurity crises unfolding in Alaska. There is an urgent need for an analysis and

subsequent report to be published documenting changes in subsistence harvests over time and quantifying how subsistence needs have not been met in a long time. The changes and impacts are stark and significant, and we need the government to back up our lived experiences with formal published documentation highlighting the profound socio-economic impacts and consequences of this.

The analysis needs to also include information such as the number of food insecure households, the replacement costs of subsistence foods with storebought foods, and associated trends in health, well-being, and crime rates. The Departments could partner with researchers at the University of Alaska and ADF&G Division of Subsistence in this endeavor.

b. Government subsidization of pollock trawl fisheries – The Council is deeply concerned that the USDA continues to subsidize pollock trawl fisheries by purchasing millions of dollars' worth of pollock for distribution to federal food-aid programs. This concern is unrelated to supporting food assistance programs in general, but instead is focused on government support of this specific fishery that: 1) results in significant bycatch of our struggling Western Alaska salmon and other important subsistence fish and marine mammals, 2) has documented harmful effects on ocean floor habitat; and 3) removes billions of pounds of biomass of a vital forage fish from the Bering Sea ecosystem. It is not a reasonable course of action to address some American people's food insecurity by negatively impacting the food security of Alaskan subsistence users and the ecosystems they depend on. The Council implores the USDA to stop subsidizing trawl fisheries immediately and find a more sustainable way to support food assistance programs nationwide.

11. Gravel-to-Gravel salmon management – Gravel-to-Gravel is an initiative through which federal agencies and Tribes have committed to work together to support habitat restoration, resilient salmon ecosystems, and communities in the region. All DOI agencies represented on the Board signed the Gravel-to-Gravel Memorandum of Understanding with several federally recognized Alaska Native Tribes, Tribally authorized consortia, and Tribal organizations in the Northern Bering Sea and Yukon and Kuskokwim river regions. This initiative is a good start to collaboratively addressing salmon issues. However, it needs to continue to be adequately funded to make any progress. Additionally, the initiative must be expanded, because it is not truly "gravel-to-gravel" without buy-in from the Department of Commerce, which oversees North Pacific fisheries and the marine portions of salmon habitat.

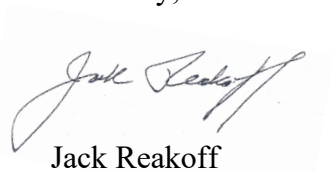
c. Allow OSM to conduct primary research and support wider inclusion of traditional knowledge into analyses – The Council feels that OSM should be able to conduct primary research when needed to help fill critical data gaps. In particular, OSM staff should be allowed to conduct local and traditional knowledge interviews. The Council continues to

advocate that local and traditional knowledge be given equal weight as biological science in reports and decision-making.

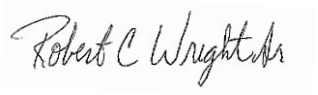
d. Ensure adequate funding for the Federal Subsistence Management Program – As mentioned, the Program is vital to the continuation of subsistence lifeways in rural Alaska. In order for the Program to adequately meet the needs of subsistence users and ensure conservation of fish and wildlife resources, the Program requires adequate funding that goes beyond just filling current vacancies. An adequate budget should include funding for the creation of additional positions to expand outreach and education and to provide meaningful support to public Board members and Tribes. It must also include funding for fish and wildlife monitoring research, as well as for expanded outreach and education to help reduce conflicts between hunting user groups, wanton waste, and violations, and to foster greater understanding of and engagement with the Program and its regulatory process.

The Councils appreciate your assistance in relaying these comments to the Secretaries for their consideration. The Councils value the opportunity to participate in the scoping process and would welcome continued engagement as the Program review moves forward. If you have any questions or would like to follow up, please contact us through our respective Subsistence Council Coordinators Brooke McDavid (Eastern Interior) at (907) 891-9181 or brooke_mcdavid@ios.doi.gov or Nissa Pilcher (Western Interior) at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff
Chair, Western Interior



Robert "Charlie" Wright, Sr.
Chair, Eastern Interior

Enclosures:

1. Nine Council letter re: Council member compensation (4/3/2024)
2. WIRAC comments re: FSB Membership proposed rule (4/25/2024)
3. EIRAC comments re: FSB Membership proposed rule (4/17/2024)

4. Seven Council letter re: fisheries issues and requests (3/28/2024)
5. Nine Council letter re: programmatic correspondence issues (4/3/2024)

cc: Federal Subsistence Board
Interagency Staff Committee
Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record

Excerpt from ANILCA Title VIII

PERIODIC REPORTS

§813. Within four years after the date of enactment of this Act and within every three-year period thereafter, the Secretary, in consultation with the Secretary of Agriculture, shall prepare and submit a report to the President of the Senate and the Speaker of the House of Representatives on the implementation of this title. The report shall include--

(I) an evaluation of the results of the monitoring undertaken by the Secretary as required by §806;

(2) the status of fish and wildlife populations on public lands that are subject to subsistence uses;

(3) a description of the nature and extent of subsistence uses and other uses of fish and wildlife on the public lands;

(4) the role of subsistence uses in the economy and culture of rural Alaska;

(5) comments on the Secretary's report by the State, the local advisory councils and regional advisory councils established by the Secretary or the State pursuant to §805, and other appropriate persons and organizations;

(6) a description of those actions taken, or which may need to be taken in the future, to permit the opportunity for continuation of activities relating to subsistence uses on the public lands;

(7) such other recommendations the Secretary deems appropriate. A notice of the report shall be published in the Federal Register and the report shall be made available to the public.