

**Bristol Bay Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
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**In Reply to:**  
OSM.A24114

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

Dear Chairman Christianson:

The Bristol Bay Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit its FY-2024 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 meeting held on October 29 – 30, 2024, the Council identified concerns and recommendations for this report. The Council approved this annual report at its February 18 – 19, 2025 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 Bristol Bay Region.

**1. Program Needs**

The Council respectfully requests that the Board advocate for increased funding to the Office of Subsistence Management (OSM) to enhance its outreach efforts to the communities within the Bristol Bay Region. The Council has concerns regarding the limited public and Tribal participation at Council meetings, which impacts the effectiveness and inclusivity of discussions and decision-making processes. The Council recognizes that there are numerous important issues, concerns, and reports from the region that would provide valuable insights for both the Council and Federal agencies. These issues often go unaddressed due to a lack of participation and awareness.

Many residents and stakeholders in the region are unaware of the Council and the Federal Subsistence Management Program (Program) and are not fully informed about how their voices can influence the decisions that directly affect their lives. This gap in understanding and engagement limits opportunities for communities to have a say in the management of subsistence resources that are so critical to their way of life. The Council believes that addressing this issue through targeted outreach and education is essential to ensuring that all relevant voices are heard and that decisions are made with a full understanding of community needs and concerns.

Considering this, the Council would like to see OSM be given more resources and support to engage directly with Tribes, village corporations, and other residents in the region. These efforts would include informing these groups about the Program, explaining how the Program works, and providing guidance on how they can participate in the Council's processes. The Council believes that increasing engagement in these communities will not only help improve participation at Council meetings but also foster more meaningful collaboration between the Council, Federal agencies, and the local stakeholders who are most impacted by subsistence management policies.

**The remainder of this report is for informational purposes only and the Council does not require a response; however, the issues are significant and important, and the Board may benefit from this knowledge.**

## **2. Council's Ongoing Concerns and Support for NPFMC's Efforts on Salmon Bycatch and Outreach**

The Council continues to be seriously concerned about salmon populations throughout the region. Bycatch in other commercial fisheries is potentially affecting the return of salmon to their spawning grounds. The Council is highly interested in receiving detailed information about the current research efforts and findings on how the bycatch in other commercial fisheries affects salmon populations and their returns. Given the importance of this matter to the region's subsistence and commercial fisheries, the Council is eager for the opportunity to engage more directly with the North Pacific Fishery Management Council (NPFMC) to discuss the findings and potential solutions. The NPFMC has previously reported to the Council at past meetings, and the Council has greatly appreciated the opportunity to hear these reports and gain a better understanding of the ongoing efforts in the region.

Recently, the NPFMC released an Outreach and Engagement Plan focused specifically on Chum Salmon Bycatch. The plan outlines their efforts to increase outreach and engagement with stakeholders, including the Council, in order to better understand the concerns of local communities and to share the latest research and policy recommendations. The Council strongly supports this Outreach and Engagement Plan and recognizes the importance of these efforts in addressing the bycatch issue in a meaningful way.

The Council looks forward to future opportunities to hear directly from NPFMC at upcoming meetings and hopes to engage in more in-depth discussions on this topic. The ability to ask questions, exchange ideas, and collaborate on potential solutions ensures that the perspectives and concerns of the Council are incorporated into the ongoing research and policy development processes. The Council remains committed to working alongside the NPFMC and other stakeholders to address the pressing issue of bycatch and its impact on salmon populations and appreciates the opportunity to continue this important dialogue in the future.

## **3. Council's Continued Concerns and Requests as Outlined in its FY-2023 Annual Report**

The Council would like to remind the Board of its continued concerns, as outlined in its previous FY-2023 Annual Report:

- **Concern for Chignik Drainage Sockeye Salmon and State Management Changes**  
The Council is concerned about changes to the management strategy for Chignik

River Sockeye Salmon. In 2022, the Alaska Board of Fisheries (BOF) designated the early run as a stock of concern, prompting the Alaska Department of Fish and Game to propose combining the early and late run escapement goals. This proposal was met with opposition from Tribes and Advisory Committees, and the BOF decided to temporarily maintain separate goals. The Council is worried that the new strategy disregards historical management practices and fails to consider the impact on subsistence users, particularly regarding the early run.

- **Request for Solicitor's Opinion in Staff Analyses**  
The Council requests that a solicitor's opinion be included in Office of Subsistence Management (OSM) staff analyses to ensure compliance with Title VIII of ANILCA. This would clarify whether proposed changes align with ANILCA before reaching the Board, improving decision-making, and ensuring land managers are aware of Title VIII mandates.
- **Request to Expedite Council Appointments**  
The Council requests the Board address delays in appointing new and incumbent Council members, urging the Secretaries of the Interior and Agriculture to expedite the process. Delays discourage applicants, and a full Council is crucial for advocating subsistence use and access in rural communities.
- **Compensation for Council Members**  
The Council requests compensation for members to reflect their time and expertise. While they receive per diem for travel, they are not compensated for attending meetings. Given the high cost of living in rural Alaska, the Council seeks a fair daily rate to better value their contributions to the Federal Subsistence Management Program.

The Bristol Bay Subsistence Regional Advisory 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 Bristol Bay Region. If you have any questions regarding this report, please contact me via Leigh Honig, Subsistence Council Coordinator, Office of Subsistence Management, at leigh\_honig@ios.doi.gov or 1-800-478-1456 or, 907-891-9051.

Sincerely,

Nanci Morris Lyon  
Chair

Cc: Federal Subsistence Board

Bristol Bay Subsistence Regional Advisory Council  
Interagency Staff Committee  
Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of Fish and  
Game  
Administrative Record