

*Disclaimer: These minutes of the Subsistence Resource Commission for Cape Krusenstern National Monument are NOT an official transcript of the Commission proceedings. Rather, the minutes serve as a summary of the topics discussed and actions taken by the Commission and as an index to the audio recording of the meeting. The official record of the Commission proceedings is the audio recording.*

*Minutes certified by chair on 3/19/2026*

Cape Krusenstern SRC Meeting for Comment on Federal Subsistence Programmatic Review  
January 30, 2026

**1:30pm**

1. Call to Order: Chair

Alex Whiting: Call to order at 1:33pm.

2. Roll call Establish Quorum: Emily Creek

SRC members: Alex Whiting, Cyrus Harris, Enoch Adams, Tim Smith

NPS: Emily Creek, Annie Carlson, Eva Patton

DOI: Kara Moriarty

Absent: Hilda Booth, Gov. Alaska; Attamuk (Enoch) Sheidt Sr., NWARAC; Brian Booth, Secretary of Interior

Quorum was achieved with 4 members out of 7.

3. Information Sharing from SRC members, if desired
4. SRC Purpose: Emily Creek  
Emily reads the SRC purpose from the Cape Krusenstern SRC charter.
5. Review and SRC Discussion
  - a. SOI: Kara Moriarty presents the information

She gave background about the office and for the programmatic review, which came from executive order 14153 “Unleashing Alaska’s Extraordinary Resource Potential”. Though the following topics were the focus of the review, she encouraged the Commission to provide any additional information as well.

1. The 2024 move of the Office of Subsistence Management (OSM), from within the U.S. Fish and Wildlife Service of the Department of the Interior, to the Office of the Assistant Secretary for Policy, Management and Budget of the Department of the Interior,
2. Criteria for regional advisory council membership,
3. Membership of the Federal Subsistence Board,

4. Federal regulations and state regulations for duplication and inconsistency,
  5. Regulations applicable to special actions,
  6. Role of the State of Alaska and its Department of Fish and Game in the Federal Subsistence Management Program, and
  7. Board policies and procedures for rural determinations.
- b. Emily Creek: If any members have questions please speak up.  
No questions
  - c. Emily Creek: Invites Chair Alex to speak
  - d. Alex Whiting: I sent out a comment a couple weeks ago and I am still satisfied with these, so I am good. Unless anyone wants to change things.

Cyrus Harris: Not at this time

Alex Whiting: I am happy with the comments, we've had a couple weeks to reflect on them.

Emily Creek: Should I read this comment over the record?

Kara Moriarity: I defer to Eva.

Eva Patton: As this is a public meeting, under FACA the discussion needs to be held on the record.

- e. Emily Creek: reads chair Alex's draft letter into the record:

“The Cape Krusenstern Subsistence Resource Commission (CAKR SRC) appreciates the opportunity to provide scoping comments for the Department of the Interior and Department of Agriculture review of the Federal Subsistence Management Program (Program). This Program is critical to ensuring that the promise of protection of subsistence opportunities and needs for rural Alaskans, made under the Alaska National Interest Lands Conservation Act (ANILCA), is met.

The CAKR SRC represents thousands of federally-qualified users in northwest Alaska who possess subsistence rights on the Cape Krusenstern National Monument (CAKR). Most are Iñupiaq tribal citizens with unbroken ties to former generations of people living in northwest Alaska going back thousands of years. The people living in northwest Alaska rely daily on fish, wildlife, and other natural resources to sustain life, participate fully in their cultural heritage, and meet their economic, spiritual, and nutritional needs.

Federally-qualified subsistence users are the only people able to hunt in the CAKR. The monument was created, in part, to allow for continued subsistence uses. The CAKR SRC was established as part of the Program to help fulfill the requirements of Title VIII of

ANILCA. The SRCs allow for federally-qualified subsistence users to recommend hunting plans to the Secretary of the Interior and to participate in the general subsistence management of the federal units with which they are associated. The SRCs comment on fish and wildlife proposals put forward by the Regional Advisory Councils and submit their own proposals from time to time.

The CAKR SRC supports the Federal Subsistence Board (Board) as currently comprised. We believe it was necessary to add three additional subsistence user seats to the Board to create a more knowledgeable body with greater representation of the federally-qualified subsistence users for whom they make rules and regulations. These new members bring a lived experience that allows for fuller discussions of proposals brought before the Board. Tribal Governments have deep knowledge of rural Alaska and its subsistence users, and they maintain a government-to-government relationship with the federal government; therefore, it is appropriate for them to serve as the nominating bodies for three of the Board members.

The CAKR SRC also supports the transfer of the Office of Subsistence Management (OSM) from the Fish and Wildlife Service to the Office of the Assistant Secretary for Policy, Management, and Budget. Decoupling the OSM from a wildlife agency and moving it to an office focused on policy and management makes sense from a technical and administrative perspective.

Furthermore, the CAKR SRC supports the current Regional Advisory Council (RAC) system and the Subsistence Resource Commissions as composed. Both bodies have been successful in enabling federally-qualified subsistence users to have a meaningful role in the management of fish and wildlife on federal public lands in Alaska. This fulfills the requirements of ANILCA while allowing for the proper regulation, protection, and conservation of fish and wildlife resources. There is no need to revise the composition of the Board or the RACs.

We support the special actions process, finding it mostly responsive and able to act in a relatively timely manner to unforeseen regulatory needs related to implementing federal subsistence. While we support in theory getting rid of unnecessary or duplicative regulations between the State and Federal systems, it's not clear to us how this is an issue of concern, since any State regulations that do not satisfy the legal requirements of implementing ANILCA and the subsistence priorities for federally-qualified users would be unable to be substituted for Federal regulations. We are also aware of some State regulations, like around snowmobile use for hunting for example, that are unable to be implemented on most federal lands in our Region, since they conflict with agency-specific regulations around the use of snowmobiles for hunting found in **50 CFR 36.12 (Alaska National Wildlife Refuges)** and **36 CFR 13.460 (Alaska National Park System)**. However, revising agency-specific regulations may be outside of this review effort.

The role of the State of Alaska in implementing ANILCA seems appropriate as is, since they are constitutionally forbidden to manage for a rural subsistence priority. If they

would like more involvement with managing subsistence hunting and fish on federal lands, we suggest that they advocate for a constitutional amendment that would bring the State in compliance with the intent of ANILCA as it relates to a rural subsistence priority. Additionally, for some federal units, like in the CAKR, sport hunting is not allowed by its founding legislation, so it will always be a subsistence priority unit. Not sure what the sport hunting advocates interest is in a unit that does not allow sport hunting regardless of who is managing.

The CAKR SRC supports the current process for rural determinations. We find the population thresholds and the 5 key characteristics used, result in what a common sense understanding of a rural community for the purposes of being qualified for a subsistence priority looks like. The community of Kotzebue, which is the hub for our Region, is a perfect example, in that it falls within the case-by-case population threshold of between 2,500 and 7,000, but all of the 5 key characteristics clearly place it in a rural category for federal subsistence eligibility.

We do not support changing the Program as currently constituted. The courts have already determined many of the issues surrounding federal management in Alaska, including the legality and Congressional intent of a rural subsistence priority on federal lands and waters. There are no major issues that need to be addressed if the Program is reviewed in good faith. In any case, the recent changes regarding the Board and OSM need time to be implemented before they are ripe for review.

Thank you for your consideration of our comments.”

So that is the draft before you.

Cyrus Harris: I just want to thank Alex for being on top of it and keeping us informed as well as the tribe, which is the correct way to do it. Thank you.

6. Vote:

- a. Cyrus Harris: Motion made to support the comment as written
- b. Tim Smith: Seconded
- c. Discussion: none.
- d. Public: none
- e. Votes: 4/4
- f. Motion passes, letter approved to be submitted.

7. Emily Creek: Any closing comments?

- a. Alex Whiting: Thanks for showing up, I appreciate it.
- b. Enoch Adams: Thank you Alex.
- c. Cyrus Harris: Thanks Alex and I want to thank Emily for getting this meeting together.

d. Enoch Adams: Taikuu

8. Adjourn: Chair Alex Whiting, 1:54pm.