

CITY AND BOROUGH OF SITKA

RESOLUTION NO. 2026-03

**A RESOLUTION OF THE CITY AND BOROUGH OF SITKA REGARDING THE FEDERAL
SUBSISTENCE MANAGEMENT PROGRAM REVIEW UNDER TITLE VIII OF ANILCA**

WHEREAS, this Resolution is submitted as both a formal statement of position and a public scoping comment in response to the Secretary of Interior and Secretary of Agriculture's (Secretaries) noticed limited review of the Federal Subsistence Management Program (FSMP) under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) that was announced on December 15, 2025; and

WHEREAS, Sitka is an isolated rural subsistence community unconnected to any road system, and the vast majority of Sitka residents harvest large quantities of traditional, personal, and subsistence use fish and game year-round for both themselves and for others, in a manner consistent with a rural community, as well documented by studies, surveys, and personal testimony community-wide; and

WHEREAS, the cost of living and the cost of groceries are higher than the national average and higher than major Alaskan cities including Anchorage and Juneau, exceeding these averages by over 30%, largely due to costs associated with transporting to the remote outer coast of Baranof Island. Between 2001 and 2017, food costs in Sitka rose 231% due to shipping cost increases, as well as labor and operational costs; and

WHEREAS, the City and Borough of Sitka Assembly have declared food security to be a priority in Sitka's strategic plan, and the ability of Sitkans to engage in subsistence harvesting is an essential component of meeting local food security needs; and

WHEREAS, Sitka has long advocated to retain its rural designation, which Sitka residents consider part of their basic cultural, social, and economic identities. Sitka has consistently submitted resolutions to support the retention of rural subsistence harvesting rights for the community, including recommendations to modify the rural determination process to allow communities to identify their rural characteristics as the basis for retaining Sitka's continued rural designation, such as the widespread use of fish, wildlife, and other wild resources, through Alaska Department of Fish and Game Subsistence studies, Coastal Management Subsistence research, and other information sources; geographic isolation; lack of connection to a regional road system; and importance of fish and other wild resources to the economic base; and

WHEREAS, the subsistence rights for rural Alaskans guaranteed under the Alaska National Interest Lands Conservation Act (ANILCA) are necessary for Sitkans to meet their cultural, economic, and social needs in vast, isolated rural Alaska, which within Southeast Alaska includes more than 17 million acres of the Tongass National Forest; and

WHEREAS, Title VIII of ANILCA, 16 U.S.C. §§ 3111–3126, was enacted to protect the opportunity for subsistence uses by rural residents of Alaska, recognizing that

subsistence is essential to the physical, cultural, economic, and social existence of Alaska Native and rural communities; and

WHEREAS, Congress expressly found in ANILCA Section 801(5) that the national interest in conservation and regulation of fish and wildlife requires an administrative structure that enables rural residents with personal knowledge of local conditions to participate meaningfully in subsistence management; and

WHEREAS, the Alaska Supreme Court's 1989 decision held that a rural subsistence preference violates Alaska's Constitution, resulting in the Federal Subsistence Management Program authority on federal public lands and waters; and

WHEREAS, the FSMP was enacted to fulfill this federal responsibility and has evolved into an effective mechanism for incorporating local knowledge, traditional ecological knowledge, and science into decision-making processes through Regional Advisory Councils (RAC), Tribal participation, and co-management partnerships; and

WHEREAS, the Secretaries have announced a limited review of the FSMP to evaluate whether it is meeting the needs of subsistence users and the obligations of ANILCA Title VIII, including review of specific regulatory and procedural topics.

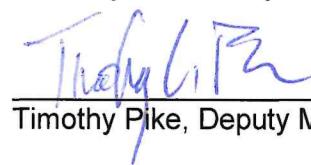
NOW, THEREFORE, BE IT RESOLVED that the Assembly of the City and Borough of Sitka affirm that the Federal Subsistence Management Program is essential to fulfilling the intent and requirements of ANILCA by ensuring Alaska Natives and rural residents have a meaningful and effective voice in fish and wildlife management.

BE IT FURTHER RESOLVED that this Resolution is submitted as formal input into the Secretaries' public scoping process and addresses the identified review topics as follows:

- The 2024 relocation of the Office of Subsistence Management should be evaluated based on whether it strengthens accountability, accessibility, and responsiveness to rural subsistence users, and that administrative restructuring strengthens the Program's local community engagement.
- Regional Advisory Council (RAC) membership must continue to prioritize federally qualified subsistence users with direct, lived experience and local traditional ecological knowledge, as the RACs are the mandated mechanism for implementing ANILCA 801(5).
- The Federal Subsistence Board (FSB) must retain meaningful rural and Alaska Native Tribal representation to ensure management decisions reflect subsistence uses and integrate local knowledge with scientific expertise.
- Efforts to reduce regulatory duplication must not undermine the rural subsistence priority established by Title VIII, and that the FSMP must remain intact due to the State of Alaska's inability to implement a rural preference.
- Special action authorities are essential for addressing localized conservation concerns, environmental change, and subsistence emergencies, and that these authorities must remain flexible and informed by RACs and community input.

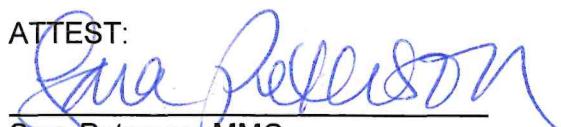
- While the State of Alaska and the Alaska Department of Fish and Game provide valuable biological and technical expertise, their role must remain consistent with the federal responsibility to implement Title VIII and must not supplant federal authority to protect rural subsistence users.
- Rural determinations must be based on the cultural, social, and economic realities of Alaska's rural residents and reflect place-based conditions rather than rigid or abstract criteria.
- The City and Borough of Sitka strongly supports the continuation of the rural status designation for Sitka, Alaska due to the community's high dependence on subsistence harvest of fish and wildlife for customary and traditional use and to meet local food security needs, the high degree of remoteness and isolation of Sitka's location on the outer coast of Baranof Island, and the community's longstanding efforts to protect our rural designation.
- The Secretaries should explicitly evaluate and strengthen Tribal co-management partnerships, such as those occurring at important subsistence sockeye harvesting sites Klag Bay and Redoubt Lake near Sitka, and federally supported subsistence monitoring and research programs, recognizing that traditional ecological knowledge improves conservation outcomes, regulatory compliance, and food security.
- Any changes resulting from this review should strengthen, not weaken, the FSMP's ability to fulfill the congressional intent of ANILCA Title VIII.
- Alaska Native Tribes and rural residents must remain central to subsistence decision-making through meaningful participation, co-management, and respect for local knowledge.
- Copies will be transmitted to the Secretary of the Interior, Secretary of Agriculture and the Federal Subsistence Board at subsistence@ios.doi.gov, Alaska's Congressional Delegation, and the Governor of Alaska.

PASSED, APPROVED, AND ADOPTED by the Assembly of the City and Borough of Sitka, Alaska on this 10th day of February, 2026.



Timothy Pike, Deputy Mayor

ATTEST:



Sara Peterson, MMC
Municipal Clerk

1st and final reading: 2/10/2026

Sponsors: Riley / Eisenbeisz / Saline