



Federal Subsistence Board

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FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

In Reply Refer To:
OSM 23146

FEB 09 2024

Honorable Deb Haaland
Secretary of the Interior
U.S. Department of the Interior
Office of the Secretary
1849 C Street, Northwest
Washington, DC 20240

Honorable Thomas J. Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
Office of the Secretary
1400 Independence Avenue, Southwest
Washington, DC 20250

Dear Secretaries Haaland and Vilsack:

The Federal Subsistence Board (Board) is writing to convey to you a request from your appointees on the Kodiak/Aleutian Subsistence Regional Advisory Council (Council). Pursuant to Section 805 of the Alaska National Interest Lands Conservation Act (ANILCA), Subsistence Regional Advisory Councils are empowered to be a forum for the expression of opinions and recommendations about management of subsistence fish and wildlife resources in their regions.

On November 14, 2023, the Board received the attached letter from the Council with concerns regarding their exclusion from recent Department of the Interior (DOI) public information sessions held in Alaska, and they requested that their concerns be conveyed to you.

During the Council's public meeting held in March 2023, the Council was surprised to learn about the President's FY2024 budget proposal to relocate the Office of Subsistence Management (OSM) from the U.S. Fish and Wildlife Service to the Office of the Assistant Secretary of Indian Affairs. Despite assurances from the Assistant Secretary for Indian Affairs Bryan Newland about extensive consultations across Alaska, the Council and many Tribes within the Kodiak/Aleutians area were notably absent from this critical outreach. The DOI should have made a concerted effort to ensure that all Subsistence Regional Advisory Councils as well as all Alaska Tribes were informed and consulted before such a significant decision was considered.

In addition to this, the Council emphasized the importance of wider public input from Federal subsistence users, a crucial aspect that they believe was overlooked.

Furthermore, the Council brought to the Board's attention the Alaska Co-Stewardship Talking Circles hosted by the Departments of the Interior and Agriculture. Regrettably, the entire Southwest Alaska region, which includes the vast Kodiak/Aleutians area, was excluded from the Talking Circles schedule. This exclusion was inequitable, given the Council's unique perspective and the valuable contributions it makes to discussions about co-stewardship. The Council asserts the Southwest Alaska region's voice should have been included with those of the other regions in broader statewide gatherings.

In response to these issues, the Council voted during their September 2023 meeting to draft a letter expressing their concerns of exclusion in these instances and requested that the Board forward this letter to your office. It firmly believes that inclusive consultation with Subsistence Regional Advisory Councils and Tribes is not only just but also essential for responsible subsistence resource management and the well-being of their communities.

Enclosed with this letter, you will find the Council's detailed letter outlining their concerns and requests. The Board, understanding the frustration expressed by the Council, supports forwarding their letter to your attention. We concur with the Council's sentiment that their Council as well as all Subsistence Regional Advisory Councils should actively participate in relevant DOI consultations affecting subsistence and Alaska communities.

The Council is eager to understand the potential effects of the proposed relocation of the OSM on the administration of and support for the Federal Subsistence Management Program. Additionally, they seek assurance of their inclusion in future DOI consultations, including scheduled Talking Circles.

We appreciate your attention to this matter and look forward to the opportunity for continued discussions on this crucial topic.

Sincerely,



Anthony Christianson
Chair

Attachments: 1_Kodiak/Aleutian Council Letter to the Board re Exclusion
2_Talking Circle Flyer
3_Email Re: Southwest Alaska - Co-stewardship Talking Circles

cc: Federal Subsistence Board
Interagency Staff Committee
Office of Subsistence Management
Kodiak/Aleutians Subsistence Regional Advisory Council
Alaska Congressional Delegation
Administrative Record