

Kodiak Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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In Reply Refer To:
OSM 23128

NOV 14 2023

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

Dear Mr. Christianson,

I write to you on behalf of the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) to request that the Federal Subsistence Board (Board) elevate the following letter with Council's concerns to the Secretaries of the Interior and Agriculture (Secretaries). The Council is concerned that the Department of the Interior did not notify or consult with Kodiak/Aleutians Region tribes and Council about the Office of Subsistence Management's (OSM) potential move from the U.S. Fish and Wildlife Service (USFWS) and we were not invited to the Alaska Co-Stewardship Talking Circles¹. Our input on these matters, which affect our region's Federal subsistence users is required for responsible management of our shared natural resources and to ensure the well-being of our communities.

The Council is frustrated and disappointed that we were not included in outreach related to the proposed move of OSM from the USFWS, where it has been housed since 1990, to the Office of the Assistant Secretary - Indian Affairs (AS-IA). Moving OSM is a significant undertaking, and the Council, as well as every other Regional Advisory Council (RAC), should have been included in early outreach on this issue. Instead, Councils received notification only after the proposed move was already included in the President's FY2024 budget and missed any opportunity for meaningful input beforehand. The Council first heard of this proposed move at our winter meeting on March 29, 2023, during a presentation to the Council by the Assistant Secretary of Indian Affairs, Bryan Newland. Moreover, it is not clear that the Tribes or communities within the Kodiak/Aleutians Region received notification of the Tribal Consultations from which this proposal arose. The Council strongly feels that the Department of the Interior should have made a pointed effort to ensure that Tribes across all of Alaska were notified and consulted before considering the move. In addition to consulting with Alaska Tribes, the Department should also seek wider public input from Federal subsistence users before considering the move.

¹ In-person Talking Circles were held in Bethel, Fairbanks, Glenallen, Nome, Utqiagvik, Juneau, Kotzebue.

We are further concerned that the entirety of Southwest Alaska (the geographic area falling within the Kodiak/Aleutian region) was excluded from the schedule for Alaska Co-Stewardship Talking Circles hosted by the U.S. Departments of the Interior and Agriculture. The Council members were notified about the Talking Circles on April 6, 2023, and immediately followed up with our Coordinator to request that a talking circle be scheduled in our region. On April 9, 2023, a subsequent e-mail was also sent to Socheata Lor, at that time, Acting Deputy Regional Director of the USFWS - Alaska Region to request a talking circle in our Council's region. However, we were told we could participate in the virtual statewide meeting in June 2023 or the October 2023 symposium at the Alaska Federation of Natives annual meeting.

To be clear, the opportunity to participate in a statewide discussion is not comparable to having an in-person talking circle held in our own region.

Our region includes a vast stretch of Alaskan coastline and coastal communities in the Gulf of Alaska and the Bering Sea. We have unique perspectives to contribute to discussions about co-stewardship, and we should have been included in the talking circle schedule. If an in-person talking circle was not possible, we should have been offered a telephonic/virtual opportunity for our region. Without a region-specific opportunity to express our perspective, our voice must compete against every other region at the broader statewide gatherings. This is not fair or equitable, and we again express our frustration and disappointment that we were excluded.

In the interest of transparent, inclusive, and well-informed decision-making, the Council asks that our region and all stakeholders be actively included in discussions and consultations related to the move of OSM and other matters affecting our communities. We believe that this approach is not only just but also necessary for the responsible management of subsistence resources and the well-being of communities in our region.

The Council would like to thank the Board in advance for discussing these important issues and elevating them to the Secretaries. If you have any questions, please contact me through our Subsistence Council Coordinator, Lisa Hutchinson-Scarborough at (907) 310-4097 or lisa_hutchinson@fws.gov.

Sincerely,



Della Trumble, Chair

Enclosures: Talking Circle Flyer

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 Members
Administrative Record