

Seward Peninsula Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To:

OSM.B26009

FEBRUARY 03 2026

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

Dear Chair Christianson,

I write to you on behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council) to provide our comments for the Federal Subsistence Management Program (FSMP) review undertaken by the Secretary of the Interior and the Secretary of Agriculture (Secretaries).

The Council held its public meeting in Nome on January 20–22, 2026, during which members received a briefing on the public scoping process for the review. The Council requests the Board to convey the following comments to the Department of the Interior, Alaska Affairs Office, for the Secretary's consideration.

1. Move of the Office of Subsistence Management (OSM) to the Office of the Assistant Secretary for Policy, Management and Budget (OS-PMB)

The Council supports OSM's move to the OS-PMB because it has improved efficiency within the program. The Council does not support additional organizational changes.

2. Criteria for Regional Advisory Council membership

The Council strongly supports maintaining the current eligibility criteria and composition, but it urges the Secretaries to take immediate action to improve outreach efforts that expand the candidate pool and enable out-of-cycle appointments when necessary. Currently, four seats remain vacant on our Council with no vetted alternates available for those seats. With the limited interest from the public to serve on our Council, vacancies persist until the next nomination and appointment cycle. Regional Advisory Councils rely on adequate regional

representation to meet the subsistence needs of rural residents across the state, and vacancies negatively impact our ability to make informed decisions on federal hunting, trapping, and fishing regulations. Having successful outreach messages and strategies for recruitment, therefore, is vital to the FSMP.

3. Membership of the Federal Subsistence Board

The Council supports the current composition of the Board and should retain its six public seats. The Council believes that having a mix of agency heads and public members is beneficial to the FSMP.

4. Federal regulations and state regulations for duplication and inconsistency

Although inconsistencies exist between Federal and State regulations, the Council notes that, every regulatory cycle, Councils and agencies already conduct routine “housekeeping” by submitting proposals to align regulations and minimize user confusion. In the current cycle, the Council considered nine of fourteen wildlife proposals aimed at aligning regulations across jurisdictions. The Council can likewise submit proposals through the Alaska Board of Fisheries and Board of Game processes for the same purpose.

The Council also emphasizes to the Secretaries the importance of the FSMP and the opportunities that the Federal subsistence regulations provide rural people to practice subsistence. In some cases, rural people would not have the opportunity to harvest culturally significant species such as moose and muskoxen on State-managed lands.

5. Regulations governing special actions

The Council supports the continued use of special actions. The special action process works, and the Board should have the authority to take these in-season actions to support the needs of federally qualified subsistence users when unusual situations arise.

6. Role of the State and the Alaska Department of Fish and Game (ADFG) in the Federal Subsistence Management Program

The Council acknowledges that the State’s current level of involvement in the FSMP is beneficial: ADF&G staff provide valuable insight. The Council supports maintaining their current role in the FSMP. However, because State regulations do not provide a subsistence priority for rural Alaskans, the State should neither be deferred to nor granted a voting or non-voting seat on the Board.

7. Board procedures on non-rural determinations

The Council supports maintaining the non-rural determination policy as currently implemented, noting that the policy was reviewed and updated in 2017 and is due for another revision soon.

The Council also fully supports the policy's emphasis on qualitative community characteristics rather than relying solely on census data.

8. Additional comments

The Council asks the Secretaries to consider providing compensation to Council members. Compensation can serve as an effective tool to help recruit and retain members as their service to the Council will require them to spend time away from their families and their work.

The Council appreciates the opportunity to provide comments on this review and thank you for your assistance in relaying this information to the Secretaries for their consideration. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Gisela Chapa at (907) 310-6129 or gisela_chapa@ios.doi.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Green, Jr.", with a stylized flourish at the end.

Louis Green, Jr.
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Seward Peninsula Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record