

Southcentral Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
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In Reply Refer to:
OSM.R26013

FEBRUARY 26 2026

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

Dear Chair Christianson,

The Southcentral Alaska Subsistence Regional Advisory Council (Council) appreciates the opportunity to provide comments on the Secretarial review of the Federal Subsistence Management Program (Program). Council members are sharing our perspectives based on direct experience with subsistence management in our region.

The Council held its public meeting in Anchorage on January 13-14, 2026, during which members received a briefing on the public scoping process being conducted by the Secretaries of the Interior and Agriculture to evaluate whether the Program is meeting the needs of subsistence users. The Council respectfully submits the following comments for consideration.

1. Interior Department move of the Office of Subsistence Management to the Office of the Assistant Secretary for Policy, Management and Budget

The Council noted that, from their viewpoint, the move of the Office of Subsistence Management (OSM) from the U.S. Fish and Wildlife Service to the Office of the Assistant Secretary for Policy, Management and Budget was seamless, with minimal disruption to the Program's processes or support to the Council, an outcome we attribute to the work of OSM staff. Moving forward, the Council will be paying close attention to how this transition may affect long-term funding and the Program's stability at its new administrative location.

2. Criteria for Regional Advisory Council Membership

The Council expressed overall satisfaction with the current application criteria. Congress did not originally design a system focused on multiple user groups, but rather on people who understood rural subsistence uses and priorities. When this shifted to the current makeup where Councils strive for 70% subsistence representation and 30% sport or commercial representation, it allowed a more balanced makeup while not eclipsing the voice of the subsistence user. This Council represents a highly diverse region with many complex issues and many subsistence and

nonsubsistence users alike. Council members tend to ‘wear many hats’ and serve on various other committees and working groups, including being elected to local State of Alaska Fish and Game Advisory Committees. This crossover results in familiarity with both the State and Federal regulatory processes and assists the Council in having robust deliberations and good discussions about subsistence issues. The process for applying to the Councils does not need to be the same as the State Advisory Committee process, and no benefits to doing so were noted.

The Council also recommends adding the option for Councils to have standing alternates. At times, a Council member may be unable to attend a meeting, and having designated alternates available in these rare instances would help prevent concerns about failing to meet quorum. Important business is conducted at both the fall and winter meetings, and without quorum, the Council members who can attend cannot complete this work.

The Council expressed concern about the length of the current appointment process, which can take 12 to 18 months. This delay can result in the loss of strong applicants who have committed their time and expertise elsewhere after assuming they were not selected. Another challenge is that potential members often cannot commit to attending meetings because Council service is a voluntary and members do not receive a stipend for contributing their time and knowledge. This has been an ongoing concern of all Councils (Enclosure 1). To attend meetings, members must take leave from their jobs, step away from subsistence activities, and – when travel is required – leave their families and communities to participate in meetings.

3. Membership of the Federal Subsistence Board

The evolution from an agency-only Board to one that includes public and Tribal members has strengthened fairness, cultural insight, and alignment with the goals of the Alaska National Interest Lands Conservation Act (ANILCA). The expanded membership has also improved the Board’s responsiveness to local input. The most recent addition of Tribal seats followed a thorough public process. The Council strongly recommends maintaining the current membership structure, as reducing it would undermine subsistence priorities and local representation on the Board without providing any benefit to subsistence users or the Program.

4. Federal Regulations and State Regulations for Duplication and Inconsistency

The Council values the input the State brings to the Program and appreciates the collaboration between Federal and State agencies. However, Title VIII of ANILCA was enacted because the State cannot provide a subsistence priority, and this has not changed. The Council strongly believes that federal regulations should not mirror State regulations when doing so would weaken the subsistence priority. In addition, federal mechanisms such as the 804 analysis are essential for ensuring a meaningful subsistence priority. These tools do not exist under State regulations, and modifying or eliminating them would disadvantage subsistence users.

5. Special Actions

The Council recommends that no changes be made to this process, as it is a necessary tool within the Federal regulatory framework. These processes are essential as they provide flexibility when

action is needed outside the regular regulatory cycle. The Council also commends the current consultation process required for non-emergency Special Action Requests.

This Council has previously expressed concern about the Delegation of Authority letters and administrative steps required to reverse them, and views WP26-01 as a positive step towards addressing these issues. The Council also emphasizes a true subsistence priority cannot involve closing opportunities for sport or commercial users only to follow with a subsistence closure the same day. To uphold a meaningful subsistence priority, there must be a clear separation between these different uses.

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

The Council would like to recognize the State for providing invaluable data and biological monitoring information that greatly supports federal decision-making. While this information sharing and collaboration are highly beneficial to the Program and to resource management, federal jurisdictions under ANILCA must remain distinct.

Council members would also appreciate more consistent input from the State during Council deliberations on proposals. In many cases, official State comments are not received before Council meetings, leaving members to rely just on information provided by OSM, their own individual experiences, and public testimony.

The Southcentral Region is geographically and culturally diverse, with both subsistence and nonsubsistence users. Roads, boat-accessible rivers, and extensive marine waterways allow people to access far more of the region than in most other regions of the State. Much of the region is bordered by marine waters outside federal jurisdiction, yet many species found in and under these waters are vital subsistence foods, both for nutrition and for the continuation of cultural practices. This inability to provide a true subsistence priority for these resources remains a significant concern for the Council.

7. Board's Process for Rural Determinations

As the population of the Southcentral Region grows, new communities and subdivisions continue to develop farther from major population centers, and demand for subsistence resources increases. In this context, how the rural/nonrural determination process is carried out becomes increasingly important.

All ten Regional Advisory Councils were deeply involved in the Board's most recent development of the current rural/nonrural determination process, which was thorough and highly public. This Council was the first to apply the new policy with RP19-01 and found that it lacked clear guidance on the Council's role within the process.

If any changes are considered, the Council recommends the following: the policy should include more specific guidance on the role of Councils, including how Councils identify what constitutes "rural" within their region; Councils should be given deference in rural/nonrural determinations;

and any proposed changes to the current determination process should undergo a public review as comprehensive as the one conducted during the last revision.

8. Other Topics Relating to Federal Subsistence Management

a. Creation of a Wildlife Resource Monitoring Program

The Council is increasingly concerned about declining subsistence resources and growing pressure on those resources from both nonsubsistence and subsistence users. More research and monitoring projects are needed to expand our understanding and to establish reliable baseline information. While a program currently exists to support data gathering for fish, there is no equivalent program for terrestrial animals. The Council recommends creating a wildlife program similar to the Fisheries Resource Monitoring Program to support data collection and long-term monitoring.

b. No further cuts to OSM or other Federal agencies

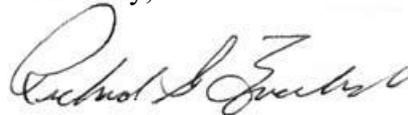
The Council recommends that no additional cuts be made to the budget or staffing for OSM and Federal field offices. Both OSM and Federal field office staff carry out work that is essential for the Councils to conduct their business and for subsistence users to continue meeting their needs. These agencies are already operating with significantly reduced staffing and limited funding for research and monitoring projects. Any additional cuts would further harm subsistence users across the state.

c. Hold an All-Council meeting before any changes are made as a result of the Secretarial review

The Council recommends that once the scoping period concludes and the Secretaries propose changes, the Councils be given the opportunity to meet together for an All-Council meeting to discuss those proposals. Meeting together would allow all Councils to review the changes collectively, develop comments together, and offer recommendations with a unified voice. The Councils are the backbone of this Program, and any changes to it have the potential to significantly affect subsistence users across the state.

The Council appreciates your assistance in relaying these comments to the Secretaries for their consideration. The Council values the opportunity to participate in the scoping process and welcomes continued engagement as the program review moves forward. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



R. Greg Encelewski
Chair

Enclosure: Joint Council Letter RE: Compensation

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

Southcentral Alaska, Kodiak/Aleutians, Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils

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In Reply Refer To:
OSM.24047

APRIL 3 2024

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

Dear Chair Christianson,

We write to you on behalf of Southcentral Alaska, Kodiak/Aleutians, Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils (Councils) to ask that the Federal Subsistence Board (Board) elevate to the Secretaries of Agriculture and the Interior a request from the Councils for fair Council member compensation.

The ten Subsistence Regional Advisory Councils met during the All-Council Meeting March 5-8, 2024, in Anchorage Alaska. Among the items discussed was the issue of Council member compensation. Currently, Council members receive no compensation for the time they spend participating in Council meetings or the knowledge and expertise they provide to the Federal Subsistence Management Program (FSMP) during such meetings. The Councils request that a compensation policy and rates of compensation for Subsistence Regional Advisory Council members be established.

The Federal Advisory Committee Act (FACA) states that agency heads may establish rates of compensation for Council members and that pay may be on an hourly or daily rate basis (see Enclosed). FACA also notes, "In determining an appropriate rate of basic pay for advisory committee members and staff, an agency must give consideration to the significance, scope, and technical complexity of the matters with which the advisory committee is concerned and the qualifications required for the work involved".

At least twice a year Subsistence Regional Advisory Council members take time away from their families, jobs, and lives to participate in Council meetings in which they provide their knowledge and expertise to the FSMP. Additionally, Council Chairs or their representatives attend Board meetings at least once a year and may periodically attend other Federal and State regulatory meetings or participate in other planning or advisory groups on behalf of their Councils. The

local and indigenous knowledge provided by Council members is fundamental to the FSMP and needed by the Board to make informed decisions about resource management issues across Alaska. Federal staff are paid for attending Council and Board meetings, but Council members are not compensated in the same manner despite their unique qualifications. Although most Council members do not hold scientific degrees, they do hold “PhDs of the land” that have been hard-earned through lifetimes of traveling out on the lands, observing their environments, harvesting subsistence resources, and listening to and sharing the stories and knowledge of their elders and predecessors.

Currently, Council members receive per diem for the days that they travel away from their home communities to attend meetings. Council members who live within 50 miles of where the meetings take place or who must attend via teleconference do not even receive per diem due to travel policy guidelines. Per diem is not compensation; it merely provides some reimbursement for meals, incidentals, and lodging while traveling. The cost of living in Alaska, and especially rural Alaska, is very high. The time Council members take away from their jobs and families to participate in meetings, whether in-person or virtually, are big sacrifices that often result in losses of income. Many Subsistence Regional Advisory Councils are struggling to recruit applicants to serve on Councils. This is not because rural Alaskans do not care about subsistence issues or lack the desire to share their expertise; it is because many rural Alaskans cannot afford to take a loss by donating their time to the FSMP to attend meetings.

Compensation for local and indigenous knowledge holders through stipends or honoraria is a common best practice carried out in academic, non-governmental, and Tribal organization arenas. The Councils respectfully ask that the Federal Government similarly value the expertise provided by Council members to the FSMP by paying a fair, daily rate of compensation to Council members when attending Council meetings or other meetings as Council representatives regardless of how far they have to travel to such meetings.

The Councils would like to thank you in advance for forwarding our request for Council member compensation to the Secretaries and requesting they reply to the Councils. If you have questions or would like to discuss this further, please contact Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or katerina_wessels@fws.gov.

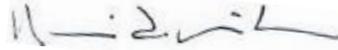
Sincerely,



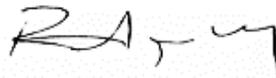
Richard Encelewski, Chair
Southcentral Alaska
Regional Advisory Council



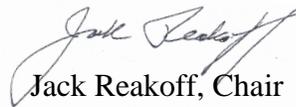
Rebecca Skinner, Chair
Kodiak/Aleutians
Regional Advisory Council



Nanci Morris Lyon, Chair
Bristol Bay
Regional Advisory Council



Raymond Oney, Chair
Yukon-Kuskokwim Delta
Regional Advisory Council



Jack Reakoff, Chair
Western Interior Alaska
Regional Advisory Council



Louis Green, Chair
Seward Peninsula
Regional Advisory Council



Thomas Baker, Chair
Northwest Arctic
Regional Advisory Council



Robert Wright Sr., Chair
Eastern Interior Alaska
Regional Advisory Council



Brower Frantz, Chair
North Slope
Regional Advisory Council

Enclosures:

1. FACA Excerpt 41 CFR 102-3.130
2. Federal Subsistence Board Letter to the Secretaries re: Council Compensation
3. Yukon-Kuskokwim Delta Council Letter to the Board re: Compensation
4. 41 CFR Subpart C

cc: Federal Subsistence Board

Southcentral Alaska Regional Advisory Council
Kodiak/Aleutians Regional Advisory Council
Bristol Bay Regional Advisory Council
Yukon-Kuskokwim Delta Regional Advisory Council
Western Interior Alaska Regional Advisory Council
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