

Seward Peninsula Subsistence Regional Advisory Council

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In Reply Refer To:
OSM.R26045

April 07 2026

Don Striker, Acting Regional Director
Alaska Region, National Park Service
240 West 5th Ave.
Anchorage, Alaska 99501

Dear Mr. Striker,

I write on behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council) to request an extension of the public comment period for the proposed rule “Alaska; Hunting and Trapping in National Preserves.” The proposed rule was published on March 10, 2026, under docket number NPS-2026-0034/1024-AE96.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Seward Peninsula Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council’s charter establish the Council’s authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions outside its regions that may impact subsistence resources critical to communities it serves. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

During the Council’s public meeting on March 30 – 31, 2026, in Nome, National Park Service (Service) staff presented an overview of the proposed rule and opportunity to comment. However, the information provided was inadequate for the Council to understand the scope of the proposed regulatory changes, their cumulative impacts on subsistence resources, and their potential effects on federally qualified subsistence users (FQSU) in our region.

The Council requests a minimum 30-day extension to the comment period to ensure the public’s meaningful and informed involvement in this decision-making process. The Council believes this extension is necessary for the following reasons:

The proposed rule is highly complex

This proposed rule encompasses expansive actions and changes from four separate rulemakings (2015, 2017, 2020, and 2024) over the last decade. Each of these previous actions was complex, controversial, and contentious among different user groups. During our deliberations, the Council repeatedly emphasized that the proposal was difficult to digest and comment on within the timeframe of our public meeting. Given the history of each of these rulemakings and the complexity of the issue, the Council and the public at large require more information to thoroughly analyze the proposed rule and understand the potential cumulative impacts to subsistence users and fish and wildlife populations.

Lack of meaningful and effective public engagement

Council also noted that the timing of the proposed rule limited the opportunity for other Regional Advisory Councils (RAC) and Subsistence Resource Commissions (SRC) to provide comments. This restriction reduced input from these critical advisory bodies, which Title VIII of ANILCA established to ensure local perspectives are included in subsistence management on Alaska public lands. Four of ten RACs and one of seven SRCs considered the proposed rule during the winter 2026 meeting cycle, relying only on limited information.

The Council is concerned that the Service's public engagement efforts to date do not meet your own internal orders to "plan early for appropriate opportunities for public involvement in our decision making process when the decisions will lead to actions or policies that may significantly affect or interest them,"¹ nor do they meet the standards for consulting with Alaska Native communities early in the planning process for meaningful and informed input². Beyond the single news release from the Department of the Interior dated March 6, 2026, and the limited information provided to RACs and SRCs as of March 31, 2026, the Service risks sidelining the voices of subsistence users and undermining the nation-to-nation relationships it is mandated to honor. Additionally, the news release did not provide critical information for the public, such as the comment deadline, instructions on how and where to submit comments, or the docket number needed to locate the proposed rule on regulations.gov

The timeline to review the proposed rule is unreasonably limited

The 30-day comment window is significantly shorter than previous rulemakings of comparable scope, which provided between 77 and 186 days for public review. The Council had less than 24 hours to develop comments – a period too brief to develop substantive and technically informed recommendations. Given that the current proposal is equally, if not more extensive, a substantially shorter review period is inconsistent with past practice.

The Council strongly believes that extending the comment period for at least 30 days is necessary to ensure full participation from Tribal governments, subsistence users, local communities, and other affected stakeholders, and to support a well-informed, transparent decision-making process.

¹ https://www.nps.gov/subjects/policy/upload/DO_71C_11-4-2024.pdf

² https://www.nps.gov/subjects/policy/upload/DO_75A_8-30-2007.pdf

I sincerely thank you for considering the Council's request to grant this extension. 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.", written in a cursive style.

Louis Green Jr.
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Seward Peninsula Subsistence Regional Advisory Council
Office of Subsistence Management
Jeanette Koelsch, Superintendent, Bering Land Bridge National Preserve
Administrative Record