

Federal Subsistence Management Program
Secretarial Review
Open House/Listening Session

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Volume II

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00;00;00;14

Kara Moriarty, Department of the Interior (DOI) Senior Advisor for Alaska Affairs:

So, I'd like to get us started again. So, folks can take their seats and appreciate those that are willing to watch in the atrium to make sure we don't get in trouble with the fire marshal. I don't like being in trouble. Alright, so folks can take their seats, please. Folks can take their seats. Robin, are we starting in the room or online?

Robin La Vine, DOI Office of Subsistence Management:

Online.

Kara Moriarty:

Online. Okay, go ahead and get started.

Robin La Vine:

The next person online to provide testimony is Eric Anslinger.

Eric Anslinger:

Hey, are you guys good to go?

Kara Moriarty:

Yes, sir. We can hear you loud and clear. Oh, and I can even see you. Awesome. All right, there we go.

Eric Anslinger:

Thank you, I appreciate it. Thank you. Yeah, so my name is Eric Anslinger. I'm calling in from Fairbanks. I am the Vice President-Interior of the Alaska Outdoor Council. I sit on the Board

of Directors for the new SCI Club, or chapter, excuse me, Northern Alaska. And I'm a member of the Fairbanks Advisory Committee. However, today's testimony will be my own personal.

I'd like to start off, talking about the Statehood Act, Section E of the Statehood Act. The Federal Government turned over all management of wildlife and fish to the State of Alaska. While Title VIII of ANILCA does exist, I would like it to be recognized that ANILCA came around as a result of President Carter pushing through the Alaska pipeline. Prior to ANILCA, President Carter's administration administered the Antiquities Act, which closed all hunting on all federal public lands in an attempt to strong arm the State.

I am very proud, as an Alaska resident, of the Alaska State Constitution. I love that Article 8 puts all residents on equal footing and saves bias from individual user groups.

With that being said, I'll get on to the points and the rule change request. Membership of the Federal Subsistence Board: I have in front of me the 1992 EIS Record of Decision books, and in the original decision, it was determined that the federal agencies would be the voting representation for the Federal Subsistence Board. I support this wholeheartedly because, while local representation and input is important, the federal agencies are to be held to a higher standard and keep biases out of decision making, which over the past two decades, we've seen increased more and more and more. Another point of note here is Title VIII authorizes a rural priority and not a Native priority, and I believe that tribal nominated seats add to the division across the state.

Federal regulations and state regulations being a duplication or inconsistency: you can see these. I have before me Appendix D of that EIS Record of Decision. It was determined for customary and traditional use that determinations for local priority will be made based off of the most economic and effective means of harvest. Yet we have individuals driving from Tok and Delta Junction past ten grocery stores traveling over 300 miles to have rural priority harvesting caribou along the Steese Highway. While residents of Fairbanks can't harvest any. I encourage the RACs to take onus and take responsibility of owning for the decisions they make and determining customary and traditional uses inside local areas. The other issue we have when the Nelchina herd closed, a new customary and traditional use was found for the town of Delta Junction to hunt Fortymile caribou.

Regulations governing special actions: there's been a lot of concern that public safety has been thrown around to close areas, and that there hasn't been any burden of proof to that public safety; no input from BLM rangers or Alaska State Troopers to support these actions.

So, the way that it looks to the rest of the public is we're not worried about populations. It's becoming a "we don't want competition, and we don't want other people in our area." Like Mr. Sturgeon said, the Alaska Department of Fish and Game conducts all the surveys and does all the population estimates for the state, so not deferring to them for their judgment for biological issues is a miss.

And lastly, the Board's determination. Yes?

Robin La Vine:

Um, I just want to note you've exceeded your time limit. If you can wrap it up, a few seconds, that would be great.

Eric Anslinger:

Yep. Board's process for role determinations: it's time to revamp that. Places like Delta Junction, Glenallen, Ketchikan, all have grocery stores and urban amenities and need to be excluded from the federal subsistence program. Thank you for your time.

Kara Moriarty:

Thank you for calling in.

00;05;45;18

Robin La Vine:

Next online is Bill Kane.

00;05;52;16

Bill Kane, Igiugig Village:

Yes, hello. Good evening, my name is Bill Kane. Though I am not Alaska Native, I've had the privilege of living, working, and practicing traditional harvesting alongside community members in Igiugig for several years. I'm calling on behalf of the Igiugig Village, and I serve at the pleasure of Igiugig Village Council's Tribal Stewardship Office. We are preparing written comments and a tribal resolution for submission and the Federal Register and are grateful for the opportunity to provide comments here this evening.

Current Igiugig residents rely upon deep relationships with the lands, waters, skies, and relatives in the region of Lake Iliamna and the Kvichak River, as has been the case for hundreds of generations. And we have deep concerns regarding the proposed restructuring of the federal subsistence management process - as for the topic here today.

Regarding the move of the Office of Subsistence Management, we believe that OSM should stay where it currently resides in the Office of Policy Management and Budget where its subsistence focus is not overshadowed by the Fish and Wildlife Service's broader goals. Another move of the office would be costly and disruptive to the federal subsistence management.

Regarding the criteria for Regional Advisory Council membership, we strongly support the criteria for RAC membership, including being a resident of Alaska; having knowledge of subsistence uses in the region, especially knowledge of local subsistence practices, TEK, and community needs; and being able to advise on subsistence issues and fully participate in that process. We do not believe that the criteria for membership needs review or should be changed at this time.

Regarding the membership of the Federal Subsistence Board, we believe that the Federal Subsistence Board membership is well balanced and should remain as it is. We strongly support the addition of the three new tribally nominated public members added in 2024. The current FSB membership represents an important and balanced perspective necessary for effective federal subsistence management for all federally qualified rural users.

Regarding the federal regulations and state regulations for duplication and inconsistency, deference to state regulations would be inappropriate and contrary to ANILCA's mandate. It would fail to uphold the Secretary's responsibilities under Title VIII. The Board administers a federal priority program on federal lands and waters. Requiring the Board to implement state regulations would be counter to the objectives of the program since the State cannot implement a policy that complies with federal law. The present regulations already grant the State a consulting role, which is sufficient for the State to weigh in on Board actions.

Regarding regulations applicable to special actions, special actions are an important tool in the work of the Federal Subsistence Board to address out-of-cycle changes that require immediate management adjustments. The special actions process works well and should remain in its current form. It does not need review.

Regarding the role... Yes?

Robin La Vine:

Um, Bill? You have exceeded your three minutes. I am so very sorry.

Bill Kane:

Okay.

00;08;53;22

Kara Moriarty:

Thank you very much for calling in.

Robin La Vine:

Next online is Andres. There's no last name. Andres, if you are still online, you can unmute yourself by pressing *6. We will move on to the next person online before returning to testimony from the room. The next person online is a phone number, 8968.

00;09;54;04

Marina Anderson:

Can you hear me?

Kara Moriarty:

Yes, I can hear you.

Marina Anderson:

Hello? Okay. I'm going to be quick because I know there are a lot of people to get through and most of what I'm going to say has already been said today by a lot of us here and who have passed on over the years. My name is Marina Anderson, and I am from Prince of Wales Island where I harvest for my community, my family, and myself.

If you come to my island in August, you'll get to enjoy fresh fish milk from my family's smokehouse with juicy blueberries and seal oil that we savor. After dinner, we can drive around the island where you can enjoy breathtaking views of mountains and ocean and experience gut wrenching views of deer beheaded by trophy hunters who take the lives of one of the most peaceful beings, only to gloat about it to their friends.

Not only do we rely on our subsistence due to the high cost of food from the stores in our rural communities, but having access to it helps us incorporate healthy proteins and other nutrients into our diets. With some of the highest rates of heart disease and diabetes across the nation, it is vital that we have access to our fish and game to keep balanced diets.

With tens of thousands of years managing our resources successfully, our people are the best stewards that could serve in management spaces such as the Federal Subsistence

Board, which is why I'm requesting that you do not reduce tribal seats on the Federal Subsistence Board. In contrast to our successful thousands of years managing our resources, the State of Alaska has years of proven mismanagement in a handful of generations, which is why I request that you do not shift authority back to the State.

Subsistence is more than providing a meal on the table. It is a way of life and should not be narrowed down to anything less. Myself and countless others have been preaching this for decades. Yeah, I'll stress again that the holistic well-being of our people and our traditional and modern economic well-being is directly tied to our subsistence harvesting.

In closing, I would ask that you please keep special actions to protect communities and scope tribal self-governance and contracting, methods that have been proven to enhance the abilities of departments to fulfill duties for our state and tribal citizens. And with that, I'm going to yield back the rest of my time. Thank you very much.

00;12;16;01

Robin La Vine:

Next, we will go back to testifiers in the room. The next person is, in-person, commenter Kyle Tripp.

00;12;39;00

Kyle Tripp, Safari Club International-Alaska Chapter:

Good afternoon. So, my name is Kyle Tripp, and I'm serving as the president of Safari Club International Alaska Chapter - the largest chapter in the world, representing more than 1,300 members. I appreciate the opportunity to provide this testimony today and its important Department of Interior scoping review on the Federal Subsistence Management Program. Safari Club International spent more than 50 years advancing wildlife conservation and defending the freedom to hunt. In Alaska, wildlife management decisions carry exceptional importance because hunting is not only a tradition but a cornerstone of food security, cultural heritage, and responsible stewardship of the resource.

Safari Club International Alaska supports the rural subsistence priority established by Congress under Title VIII of ANILCA. That priority remains federal law. However, Department of Interior must ensure the Federal Subsistence Board operates transparently within its lawful authority and grounded in sound science rather than politics. I'm going to propose five necessary reforms, and I want to reiterate what John Sturgeon has said earlier that wildlife sustainability must come first.

Reform number one is restore the Federal Subsistence Board back to its original structure. The Board has extended, expanded into an 11-member body, including six public members not authorized by ANILCA. SCI urges the Department of Interior to restore the Board to its original structure, consisting of only five federal management agencies, strengthening accountability and reduction of politicization.

Also, strengthen the Regional Advisory Councils through true local nomination. Regional Advisory Councils were created to encourage the local participation, yet membership is currently selected through an opaque process. Department of Interior should reform the RAC selections, so councils truly reflect the local communities and all regional interests, subsistence, sport, and commercial.

Require meaningful deference to Alaska Department of Fish and Game Science: ADFG biologists conduct the most comprehensive wildlife surveys and long-term research in Alaska. DOI must require the Board to defer to state expertise and conservation actions, ensuring decisions remain grounded in biological data.

Number four: eliminate the duplicative regulations that create confusion. Duplicative federal regulations force Alaskans to navigate two overlapping rule systems. DOI should work with the State to de-duplicate regulations within one year, creating clarity and improving compliance.

And lastly, limit the emergency and temporary special actions to true emergencies. Emergency closures have been misused in non-emergency situations, bypassing public involvement and state review. DOI should limit the special actions strictly to the true emergencies with clear time limits and transparency.

My closing, Alaska wildlife is the public trust that belongs to all Alaskans. These reforms are law corrections that restore Federal Subsistence Program to as Congress intended under ANILCA: science based, transparent, accountable, and focused on conservation first. On behalf of SCI Alaska Chapter, I urge the Department of Interior to adopt these reforms, restore confidence, and ensure that science guides decisions, not politics. Alaska deserves better, and the future of our wildlife legacy depends on it. Thank you for your time.

Kara Moriarty:

Thank you, Kyle.

00;15;59;22

Robin La Vine:

The next person in the room is Lisa M John.

00;16;12;07

Kara Moriarty:

I definitely encourage the children participation. I'm all about it. So, if there if they're so inclined, I would love to hear their names as well. Please.

Lisa John:

Okay, what's your name?

Zachariah John:

Well, Zachariah.

Dustin John:

Dustin.

Kara Moriarty:

Dustin, okay. And I hope that this is extra credit at school tomorrow, so.

Lisa John:

Oh, I'll let them know.

Kara Moriarty:

Yeah. Thank you very much, Lisa. Go ahead.

00;16;36;26

Lisa John:

Yeah, so I just wanted to bring them here. I just wanted to say that I'm Athabaskan, Deg Hit'an Athabaskan from Shageluk, Alaska, and I grew up in the village. I grew up in Grayling and Shageluk both, and I had the privilege of growing up in fish camp. My children, they don't even know what it's about. Fish is our way of life. It's the heart of our people. And, they don't know what it is or what it means because we haven't had, you know, any summers where we could take them to fish camp.

And so, I called Lisa Murkowski's office this afternoon, Dan Sullivan, and Mike Dunleavy. Only Lisa Murkowski's office called me back to see if they will be here. I don't know if anybody is here representing Mary Peltola, you know, but I think that this is important

enough for one of them to show up. Aren't they representing us? And also, there's a lady here named Karina Wally. I'm not sure where she is.

Kara Moriarty:

Karina was here earlier. She had to go take her kids somewhere this evening, so. Yeah, I saw her during the break.

Lisa John:

She was. Yeah, but she's here from Lisa Murkowski's office. But I just wanted to, because I know there's a lot of chiefs here and tribal president here, but I just want to shed light on the fact that our people are under, you know, civil war. This is war tactics on our people, cutting off our food supply, cutting off our resources. That's war crimes against Alaska Natives. And it should be treated as such. I want everybody to know that here because you cut off our food supply, you cut off the PFD. How many Alaska Natives, you know, depend on the PFD? They're cutting that off. They're taking away our food supply. The freezers are empty, and they're slowly killing off our people, killing off our way of life. My son's here. They're going to be the next in line to represent us. So, I want them to see firsthand what's going on here.

And I went to the last fishery meetings. I was witness to everything there. There was over 300 people who testimonies, who made testimonies. And I saw the Fisheries Board; I witnessed one man making fun of everybody, you know. All these testimonies here, everybody is saying the same things. Yes, we are, because it is important to us. But where's our representatives? Nobody is taking us serious. You say you're going to go and read all these comments, all the testimonies? What are you going to do about it? Nothing is being done. It's not fair. 4 to 3 vote. Every single vote: 4 to 3, 4 to 3, 4 to 3. And I've heard many people saying that those votes are bought and paid for. So, it is a losing battle. This room is so small compared to the Dena'ina Center where it was the last time. You ask people to leave here. You ask people to talk for three minutes. That is not, that's not fair at all. These people are spending how much money to come here and speak to everybody. It is extreme disrespect. Thank you very much.

Kara Moriarty:

Well, Lisa, I appreciate your comments. I will note I saw names on the screen of people from Senator Sullivan's office had called in earlier. I can't see all the names now. So, I do know that Joe Burns from Senator Sullivan's office called in from DC. So, I just wanted to note that. I didn't notice other names, but.

00;20;43;03

Lisa John:

Well, I hope that they represent us.

Kara Moriarty:

Yes. Yeah. So, I appreciate your comments. Thank you very much for coming.

Lisa John:

Yes. Say bye, boys.

Zachariah and Dustin John:

Bye.

Kara Moriarty:

Bye, boys.

Robin La Vine:

Next person I have on the list did suggest they wanted to speak anonymously. His initials are R.D. And I will note that we have staff just down the hall who can take your comments and type them up and submit them as written comments instead of spoken comments.

00;21;33;08

Someone in the room:

Initials not R.A.?

Robin La Vine:

No, they are R.D. And so if, that person has had an opportunity to provide comments through other means, then I will move on. Next person in the room is Natasha Hayden.

00;22;05;15

Natasha Hayden, Native Village of Afognak:

Good evening. Thanks for being here. I would also like to acknowledge the homelands of the Dena'ina people. Thank you for giving us an opportunity to speak here and convene. My name is Natasha Hayden. I am from Kodiak, Alaska. If you're not familiar with it, it's a big rock in the middle of the North Pacific.

00;22;22;28

Kara Moriarty:

Don't you call it the rock?

Natasha Hayden:

We do. We do, those of us that are blessed and have the intestinal fortitude to stay there. I'm representing the Native Village of Afognak, of which I'm a tribal council member. And so I'm going to read our, our Tribe is submitting these comments in strong opposition to any action that would weaken, restructure, or eliminate the Federal Subsistence Board or the Office of Subsistence Management, the rural priority that's been established under Title VIII of ANILCA. Such actions would undermine federal law and federal trust responsibility and the subsistence lifeways of our tribal citizens.

The Federal Government has a legal obligation to engage in government-to-government consultations with Alaska Native tribes while—before proposing or implementing and changing any of the program. Proceeding without full tribal consultation violates federal trust responsibilities. I acknowledge that we are, that we have been invited to request tribal consultation, but that we haven't had, we haven't had any of those yet. So, the Secretaries of the Interior and Agriculture set up the program to implement Congress's creation of the rural priority subsistence fishing under Title VIII of ANILCA because the State of Alaska is legally barred from providing priority for subsistence access to a subset of residents, the program provides the only legal protection for Alaska Native subsistence. Many rural Alaskans are citizens of Alaska Native tribes and rely on the program to continue to practice ancestral traditions.

You know, for the sake of brevity, I'm going to just, I'm going to just paraphrase that we are opposed to moving the Office of Subsistence Management. Again, we are looking forward to seeing how the performance of OSM in its new location will bear out before making any future changes.

We are in favor of preserving the Board's public seats. I had mentioned that the Federal Government has a trust responsibility to Alaska Native tribes, tribes across the United States. Section or Title VIII of ANILCA is federal Indian law. And so, this is the only mechanism for tribal citizens who are the users and have been dependent upon and the stewards of the resources to have a meaningful role in the process.

The Board should not defer to Alaska Department of Fish and Game. You have heard comments speaking to this directly, but in addition to that, knowing the limitations that the State of Alaska has—it's a bureaucracy, just like any other bureaucracy across the country. There's limitations. It was mentioned that they do all of the surveys and are the ones that

are doing, collecting all the biological data. They're doing that on a very limited capacity based on funding. And so, there's severe limitations that are built into the Alaska Department of Fish and Game that, when the Department of Interior and the Department of Agriculture become in full compliance with ANILCA, they have an opportunity to supersede the Alaska Department of Fish and Game's ability to manage these resources as mandated in ANILCA.

Just, all of the other issues that this scoping process is looking to explore, we're not in support of making any of the changes that have been done. And I serve on the Kodiak/Aleutians RAC, the Regional Advisory Committee. And I would also like to note that the notification came to us, I believe, 1 or 2 days before our fall meeting last fall about this scoping process. It was, the timing is inadequate. And we request that the scoping period be extended and would like to communicate our displeasure in the timing of how it was noticed. It wasn't even, I mean, there wasn't even letterhead on the piece of paper that we got that had the topics that were being looked into. And then the period closes before our next RAC meeting. And so there isn't even an opportunity for the RACs to provide meaningful input on this process with the way that this is being handled.

So, thank you very much for giving us an opportunity. And again, you know, sometimes planes, a lot of times planes don't even make it in and out of Kodiak. And I'm just lucky that I had to fly yesterday, so that I could make sure that I was going to be here today because there's a big storm in the Gulf of Alaska. It's one of the things that we all have to deal with as Alaskans. Thanks.

00;27;14;11

Kara Moriarty:

Thank you, Natasha. My husband's one of those Alaska Airlines pilots, so I'm quite familiar with the challenge of getting in and out. And I would just say, on the tribal consultations, again, for tribal leaders that are in the room, we have yet to schedule any of them. That will happen in the coming weeks and months, likely. It will take that long to get through the various requests, and I will honor every single one. And so, Orville, at OSM, I don't remember Orville's title.

Crystal Leonetti, DOI Office of Subsistence Management:

Orville Lind, Native Liaison.

Kara Moriarty:

Yeah, he's just Orville. So, our Native Liaison will be the person helping me reach out. If you request a one-on-one, I will honor that. And again, for those that may not have heard, we will have two state-wide tribal consultation opportunities. One on March 10th and one on March 17th. Thank you.

Robin La Vine:

Thank you. Before moving back online, I have Rick Delkittie as next on the list.

00;28;43;06

Rick Delkittie:

Thank you. I'm a tribal member, 10,000th generation Athabascan from the headwaters of Bristol Bay, Lake Clark. I come with concerns and issues for all of the renewable resources that we utilize, and I've heard this before. Indigenous people and non, presenting concerns about their way of life.

To address the issues of today and tomorrow, one must look at yesterday. The Kodiak king crab collapsed. Bristol Bay king crab is in peril. Mulchatna caribou herd has collapsed. But then what's going on in Cook Inlet with the beluga? All these resources that we utilize, that we put on our table, they already have adversaries without the human part. So, we live in a difficult time. I'm a witness to - renewable resources have an adverse impact with the climate.

So, with this change in time, the people who are in power to address policies and make determinations for these resources—they can't speak for themselves. We wouldn't be here today if that was the case. So, this time, the policies and the laws that surround these renewable resources need to change also. These resources, if they don't have change and how people utilize them and harvest them, we're going to be back here again. And it's going to be a lot more worse.

I've heard this a long time ago. Pre-1959, our Tribe understood when not to bother a specific resource. I remember, I hunt geese. I go to my dad and get 22 shells. One day, I come over to him with the 22. He said, "Son, you're not getting any more shells." I said, "How come?" "You can't bother them anymore." I said, "How come? They're going to have eggs." "Leave them alone." And they understood when not to bother all the resources that we utilize for that single reason. I believe that the sport hunting on the moose and caribou, they should not allow them to hunt until they've done their business with the cows. Only it's not like that.

Now all of a sudden, here comes 1959. How ironic they called it the last frontier. I wish they would have treated like that, only with 180 degrees the other way. Take, take, take. Look at the halibut now. What is management doing? It would be interesting to see the agenda and their discussions pre-collapse of a specific resource. It's time that the people who are in these different departments that address these issues need to start listening to the Indigenous community. We understand these resources all too well. We've learned it from our ancestors that then taught. So, I would really like to thank you guys for giving me this opportunity to address, I could talk for a long time.

Kara Moriarty:

Thank you. Thank you very much, Rick.

00;33;16;07

Robin La Vine:

We're now going to go back online. The next person in the queue has the last four digits of their phone number is 7990. 7990.

00;33;40;29

7790 Voices:

Hi. Hi, can you hear me?

Kara Moriarty:

I can hear you just fine.

Laaganaay Tsiits Gitanee:

Okay. Wonderful. I'm actually here with two other people besides myself who would like to provide comments. Is that possible?

Kara Moriarty:

Just go ahead and introduce yourselves as you provide your comments, please. That will help us as staff, or the staff and the transcribers.

00;34;13;09

Laaganaay Tsiits Gitanee:

Okay, perfect. [Spoke in Tlingit language]. My name is Laaganaay Tsiits Gitanee. Laaganaay's spelled L-A-A-G-A-N-A-A-Y. And my last name is two words, Tsiits Gitanee, T-S-I-I-T-S, space G-I-T-A-N-E-E. I'm calling on behalf of myself at this time although I do serve as Vice President for the Organized Village of Kake Tribal Council. I want to

acknowledge the Dena'ina people whose land all of you folks are on who are in person there in Anchorage, and I want to thank all of the tribal leadership and all of the Native people who have spoken up on behalf of protecting our Alaskan Native ways of life.

I want to start off with just a few quick points about this whole scoping process. The short amount of time that it was pushed into and then now to be reduced to three minutes for comment during an open house, just to acknowledge all the others that have commented on it, it's really bad practice. And I hope that in the future, better care can be taken for all the voices to be heard respectfully.

Now to the scoping itself, reducing tribal seats in the Federal Board is wrong. Tribes are governments, not stakeholders. Tribal representation on the Federal Subsistence Board should be strengthened and not weakened. I took note at the beginning of the meeting when deference was paid to the government-to-government relationship with the State of Alaska. And I remind our federal partners that you also have that government-to-government relationship with our tribes, and one that requires a higher level of recognition and support because of the federal trust responsibility.

Authority should not be shifted back to the State. Federal subsistence management exists because the State of Alaska has failed to protect subsistence rights over and over again. Any changes should move authority toward the tribes, not to the State or niche special interest clubs who have no government-to-government status. Tribes and Alaska Natives have a political status, not a racial one with the Federal Government. The Federal Subsistence Management Program recognizes this and rule-makes accordingly. Furthermore, even the United States Supreme Court continues to deny the State's request to take over as it is in contravention to the law to allow them to do so.

Subsistence must not be narrowed or treated like recreation. Subsistence is a way of life. It is tied to our inherent sovereignty, food security, culture, and spirituality. DOI should protect and strengthen subsistence, not redefine it or limit it. They are required to follow the law, not make it. Today, the State of Alaska and others who come here to recreate do so because our ancestors and our people have protected its abundance since time immemorial through laws of our own governance over our own behaviors. We are the best people to manage and protect Alaska's abundance. We have been doing this for thousands and thousands of years, as you heard, as you've heard, not just for the past 50 or maybe the past couple hundred.

The RACs should remain as they are at this time. Leave OSM where it is at this time. Special actions must remain available to protect tribal communities. DOI should not restrict special actions in ways that prevent tribes from responding to food shortages, climate impacts, or emergencies. This one is really personal to me because it was Organized Village of Kake who fought this in court, and we won against the people who would try to remove special interests. DOI must include...

Robin La Vine:

Laaganaay? I'm sorry, we've reached...

Laaganaay Tsiits Gitanee:

Yes, can you hear me?

Robin La Vine:

Yes, we can hear you, but you've exceeded your time limit. We have so many people online and in the room. We are really sorry. We are limiting the opportunity to comment right now. However, you can submit your full written comments if possible or contact Kara Moriarty to continue the discussion. And...Thank you.

00;39;01;26

Laaganaay Tsiits Gitanee:

Yeah, so just to complete my sentence, DOI must include tribal self-governance and compacting as a future option. And I'll pass the phone to the next commenter who will introduce herself.

Kara Moriarty:

Thank you.

Barbara Blake:

Hello, this is Barbara Blake. Can you hear me?

Kara Moriarty:

I think so. You said Barbara. Is that correct?

Barbara Blake:

Yes, Barbara Blake. Can you hear me? Okay.

Kara Moriarty:

Awesome. Yep, we can hear you just great.

Barbara Blake:

Okay, great. I want to submit this statement in my personal capacity. I just wanted to note that I come from 15,000 years or 750 generations of what is being referenced as subsistence, but what we know as our way of life. I also want to lend my personal support to allow tribal leaders greater time. They're not representing individuals. They're representing hundreds or even thousands of people, like Tlingit and Haida that is representing over 38,000 tribal citizens.

I respectfully ask the Department of the Interior to use this programmatic review to clearly reaffirm that subsistence on federal public lands in Alaska is a legally protected federal responsibility under Title VIII of ANILCA, not a discretionary policy choice. The record should state plainly that the Department's primary legal obligation is to rural subsistence users, and this obligation cannot be outweighed by state preferences, administrative convenience, or non-subsistence interests. The Department should also make clear that any changes that weaken the rural subsistence priority, limit the authority of the Federal Subsistence Board, or restrict the Secretary's ability to act independently of state regulations would be inconsistent with Title VIII. Increased deference to state regulations is not legally permissible where the State of Alaska cannot implement the federal subsistence priority, and federal management remains an ongoing obligation unless and until state law fully complies with ANILCA.

Finally, the record should affirm that Title VIII protects more than harvest opportunity. It protects food security, cultural continuity, intergenerational knowledge, and the social and economic well-being of rural communities. And it requires meaningful participation by subsistence users in decision-making. Where conflicts arise, where conflicts arise, the federal subsistence priority must control and cannot be treated as co-equal with recreational, commercial, or administrative objectives.

I also want to share why this matters to me personally. I am Haida. For us, subsistence is not only about food, it is spiritual. As Gloria mentioned earlier, Nani Delores also shared another teaching with us about her Haida religious beliefs and about the sacred role our schools held in keeping our spiritual connection alive. She taught us that in our Haida way of knowing, our traditional foods carry and sustain our "suh-ste-na," our living spiritual connection to Haida heaven. Our foods are not only nourishment for our bodies, they are part of our spiritual practice and our relationship with the ancestors who came before us. When we are able to harvest, prepare, share, and eat the foods that belong to us, our "suh-

ste-na” remains strong. When those foods are restricted, displaced, or treated primarily as recreational or commercial resources, our “suh-ste-na” begins to dry up and our connection to Haida heaven weakens. We become further removed from our ancestors and from the teaching we are meant to carry forward to our children. Our foods are our last uninterrupted thread to our ancestors. Protecting access to those foods through strong subsistence policy is not only a legal responsibility for my people, it is a religious and spiritual responsibility. Haawa. I'm now going to pass the phone to the third testifier.

Kara Moriarty:

Thank you, Barbara.

Michael Levine, Ocean Conservancy:

Hi, are you able to, are you able to hear me?

Kara Moriarty:

I can hear you just fine.

00;43;02

Michael Levine:

Thank you, my name is Michael Levine. I live in Juneau, Alaska, and my title is Senior Director of Alaska Programs for Ocean Conservancy. Ocean Conservancy will submit full written comments, and I will be extremely brief here. I do not want to take time from the tribal and other leaders in this already extremely abbreviated process. I did, though, want to express strong support, on behalf of Ocean Conservancy, for all of the Indigenous voices that have been heard thus far and the others that are yet to be heard.

I also want to note that the justification for this scoping process is spurious at best. All of the leaders in this room and online have taken time away from supporting their families and communities because the current federal administration decided it was important to force this process on them at the behest of an outside entity, and this was done without consideration of the perspectives or needs of those thousands and thousands of Alaskans most impacted.

While ANILCA and the process may not be perfect, there is nothing being considered in this process that could possibly make things better. The government should quickly put this process to rest, and for now, leave the subsistence management process under ANILCA as is, and I will gladly give back the rest of my time to people in the room and online.

00;44;19;10

Kara Moriarty:

Thank you very much. I would just like to note there was a question about other offices being represented. We've received notification. Again, you can't see all the names of folks that have been online this whole time. And they've kind of, like, gone back and forth and some just have phone numbers, but it's my understanding that Senator Sullivan staff in Kenai, Elena Sprecher, has been on the phone as well as Josh Walton, a Representative Begich staff in DC. So, I just wanted to put that on the record.

00;44;56;13

Robin La Vine:

We're going to return to in-person comments. The next person on the list is Kristen Mehan.

00;45;19;05

Kristen Mahan:

Hello, thank you for allowing me the opportunity to speak today. My name is Kristen Mahan. While I'm non-native, I've had the privilege of being born and raised in Alaska, and I'm a subsistence user living in Yakutat, Alaska. I'd like to urge the Federal Government to maintain the current subsistence management system and reject any proposed changes.

For communities like mine, subsistence is not a hobby or a choice. It is how we feed our families and care for our elders. Eliminating or weakening the rural priority would threaten our food security. I hunt, fish, and gather to provide food for my family because store-bought food in Yakutat is simply unaffordable. Subsistence is not optional under these conditions; it is survival.

Proposals to shift management back to the State of Alaska deeply concern me. The State is already stretched thin in Southeast Alaska in managing fish and wildlife, and I fear it would not have the capacity to absorb these changes without further restricting access or rural subsistence users.

Reducing public and rural representation in subsistence decision-making would silence the people who live with the consequences of these decisions every day. Federal subsistence management exists because the State has repeatedly failed to uphold the rural priority under ANILCA. Any changes that weaken the current system would prioritize recreational access over food security, cultural survival, and the intent of federal law.

I urge the Federal Government to oppose any proposed changes and maintain the current federal subsistence management or federal subsistence management system. Thank you.

Kara Moriarty:

Thank you very much.

Robin La Vine:

Next person in the room, Markliam Sappington.

00;47;22;10

Markliam Sappington:

Hello, my name is Markliam Sappington. Thank you for your time. I'm a resident of Yakutat, Alaska, and a subsistence user. I'm against the proposed changes to the federal subsistence management system. I do not understand how these changes can be considered when so many people truly rely on these resources. In Alaska, a subsistence lifestyle isn't a choice. It's a daily reality. When it comes to these communities that are not on the road system, that rely so much on subsistence; there are no access to affordable food other than what they harvest sustainably themselves. This infringement in our subsistence rights unites us all and is a serious threat to the way of life of everyone in these communities. The wants of those who do not truly understand a subsistence lifestyle should never outweigh the needs of those who rely on these resources. Thank you for your time.

Kara Moriarty:

Thank you.

00;48;21;20

Robin La Vine:

Next from the room, Elias Nelson.

00;48;36;07

Elias Nelson:

Hello, my name is Elias Nelson. I'm from Yakutat, Alaska. Subsistence has been the foundation of my family's health and survival for generations and beyond. And I know that most members of my community can say the exact same thing. That being said, this accounts for more than just a long-standing tradition, but a way of life for all members of our community. And beyond it being the paramount means of nutrition and sustainability, it's also a key pillar in the ways we teach and communicate.

Specifically for me, it accounts for some of the earliest understandings I had for what taking pride in a system like that felt like. It came from watching my grandmother fish. She was a gillnetter. She did it alone. She did it well into her 60s, and it helped me understand that interacting with the land under the conditions of respect and stewardship is the way to take care of your community. She didn't always do it because she liked it, but she had a family to take care of. Those were the things at our disposal. That's what she knew how to do. It was taught to her.

And that being said, I believe that, you know, the children of this generation and those beyond deserve and could truly benefit from the same sense of ownership and community that I felt learning these things. And, oh, any decisions made affecting the rights for a community like Yakutat or those similar to it would, in my perspective, do irreparable harm to the structure of the community and disenfranchise an area that depends on these means for survival. Thank you.

Kara Moriarty:

Thank you very much.

00;50;39;02

Robin La Vine:

We're going to go back online. The next person online, Andres.

Andres:

Hi there, can you hear me?

Kara Moriarty:

Yes, we can hear you.

Andres:

I'll keep it succinct because I'm driving and don't have my comments in front of me. And hopefully other elders who have much more knowledge and experience can use some of the time I'll leave. I just think that these propositions are, frankly, a bad idea.

The removal of public seats, three of whom which are tribally appointed, and leaving all these decisions to five people from Washington, DC, making subsistence decisions is just, feels pretty ludicrous. To take people with lived experience, subsistence, like they do this day in and day out, off the Federal Subsistence Board, I just think that's just a laughable

proposition. I think it's important that we maintain what we have. It's not perfect, but, with the addition of the three tribally selected seats, we're actually getting local traditional ecological knowledge on this board making decisions.

It's important, I think, to also to keep the RAC system as it is. I think as we've heard from today, you know, just the sheer impossibility of hearing all the voices and the knowledge in this room, online as well. And so, I think, you know, handicapping the RAC system would just really cause a lot of harm to subsistence management on public lands. Because with the RAC system, we have those local perspectives. As so many people have said, when there are changes, whether it's climate or other food security issues, people in their communities at the RAC, with their tribes, they can take action, and I think that's super important.

So, I think we should leave our federal system as is and hopefully think of better solutions in the future—ones that are grounded in the experience of traditional ecological knowledge, the knowledge of our indigenous stewards of this land, and subsistence users. Thank you.

Kara Moriarty:

Thank you very much. Drive safe.

00;53;12;09

Robin La Vine:

Next online is Kimberly Strong.

In the room:

Whoo hoo! [laughter]

Kimberly Strong, Village of Klukwan/Chilkat Indian Village:

Hi, got a cheering section here.

Kara Moriarty:

Yeah, thanks for your patience, Kimberly.

Kimberly Strong:

[Spoke in Tlingit language]. I'm Kimberly Strong. My English name is Kimberly Strong. I come from the federally recognized Village of Klukwan, officially named Chilkat Indian Village by the Federal Government for the recognition of us.

I want to first state a couple of things. One, it is really surprising to me that this whole system is set up between 4 p.m. or 3 p.m. and 7 p.m. during the dinner hour for most people. And I kind of like it that, yes, you're going to 7 p.m. because you're going to encounter the people who may be working in the Anchorage bowl. But I also feel like the missed opportunity to hear the true testimonies of people who have traveled a great distance to have their testimony heard in person because the impact of hearing the people in person is a lot different than us putting it in writing. And all that being said, I will send in testimony for the Chilkat Indian Village. I don't think I introduced myself as the President of Klukwan, federally recognized again, but as the Chilkat Indian Village.

There's a few things that come to my mind, and I'll try and try and keep within my three minutes, so you don't have to interrupt me. But one is that ADF&G may do things by science, but ADF&G also is not well funded by the State of Alaska. They've pulled out weirs. They're cutting down their gauging. When I ask ADF&G about what are they doing about contamination in the waters and water testing, they say that's a different department. The other department says, the Department of Environmental Conservation says, oh, they don't have the time to or the resources to take water quality testing in all of the different tributaries in Alaska. "Don't you know how many how much water we have here?" That's a sure sign that Alaska doesn't have the ability to monitor or have any ability to regulate all of the areas that they're claiming and wanting.

And I think that that the ANILCA was really set up as a compromise by Alaska Natives. We, Alaska Natives, in the use of getting the Alaska Native Claims Settlement Act into place, said, "no, we're holding out for Native subsistence rights." No, we can't do that. The State of Alaska pushed back really hard on that. But Alaska Natives compromised. They compromised our, my elders and my community, I was just a young girl, 12 at that time. They compromised and said, "we will go with a rural subsistence priority." I don't agree with you guys bringing these changes from outside interests. And yes, there are some people who are part of the organization that was bringing these changes forward. But again, this is a political thing. When they say, "well, we can't, you can't make any priority for those Natives." Honestly, Alaska was stolen from all of the Alaska Natives. There is no way that we need to compromise again and say, we're not, we're okay. We'll step aside because an outside interest has a priority of what we live off of. Our way of life is threatened once again by westernization and colonization. The priorities that we look at in our lives is wanting to sustain the pristine beauty of our country and also looking at wanting to sustain our way of life. Hunting, fishing, and gathering is who we are as Native people. We can't be, we can't be saying, "Oh, it's okay. Let's step aside" every time, and we've been traditionally doing

that. Yes, there's been big outside pressures to not, to compromise and say, "yeah, we can do this."

Robin La Vine:

Kimberly?

Kimberly Strong:

I think that, that just one more, a couple more things and I'll let you go. I think that the Federal Subsistence Board should remain the same. The Federal Subsistence Board should not defer to ADF&G, again, and preserve the Federal Subsistence Board's flexibility. And please preserve the process that is there for rural considerations. Thank you.

Kara Moriarty:

Thank you, Kimberly.

00;58;43;19

Robin La Vine:

Next online before we return to in-person testimony: Thomas Smith.

00;58;58;22

Thomas Smith:

Hello, can you hear me?

Kara Moriarty:

Yes, we can hear you just fine, Thomas.

Thomas Smith:

Awesome, thank you. Sorry, give me one second. Okay, waqaa. [Spoke and introduced self in Alaska Native language]. Hi, my name is Thomas Smith. I'll be representing myself today. I'm Yupik and Athabaskan from Iliamna, Alaska. I was born in Anchorage, raised in Kenai, and I currently reside in Sitka. I would like to acknowledge and thank the Native peoples of this region, the Dena'ina peoples, for allowing this process to happen and many more hopefully in the future.

I would like to comment on what the Secretary has planned for a subsistence program moving forward. As we can see and heard from the previous testimonies today, the system has been crucial in maintaining our community, Indigenous voices and traditional ways of life at the center of this process. I have been active in the Southeast Council through my

participation in classes at UAS under Heather Bauscher, an internship with Sitka Conservation Society, and my continued interest through an occupational endorsement in aquaculture. I also currently have my application, for a youth seat, sitting in DC. These are for the Southcentral and Bristol Bay Regional Advisory Councils. These subsistence meetings allow anyone to express their grievances and share their observations regarding their subsistence experiences. This means anyone from elders to youth. As an Alaska Native who grew up in the Southcentral region and now lives in Sitka, I would like to demand our voices be heard.

Many of these systems give us ways to speak up and be heard by the government that, unfortunately, many generations ago, placed itself on top of our ways of life. This blanket effect is slowly suffocating our ways of life. We see in Board reports that Native villages are, in fact, struggling. No systems are perfect and many systems need improving, but there are many aspects of this system that I would like to see maintained. These regional advisory councils and the subsistence regulatory processes, *[stuttered]* sorry, have been some of the most publicly available testimony opportunities and are crucial to elevating public concerns and Indigenous voices to higher levels of government.

I will now read my concerns regarding the review of the Federal Subsistence Management Program. For the record, after, I will go back and discuss them a bit more thoroughly. I do know I have a time constraint. I will try to keep it short. I would like to see the initial deference to the Regional Advisory Councils, maintain the current makeup of the Board, including six public seats, and youth seats for the Regional Advisory Councils. The existing criteria, including knowledge of subsistence resources for serving on the councils, the Board and the continued expression of the rural public voices versus the promotion of our resource commercialization. As I learn more about our history and listen to testimony, it is clear that many people over the years have fought very hard to make ourselves heard as Alaskans, and to see these attempts at minimizing our power as public voices in this process is infuriating. I've admired the strict coherence to the Board. Sorry, let me restart. I've admired the strict coherence to the Board, that the Board has in deference to the councils because the councils are the ones who truly know our communities. The recommendations from the councils directly reflect the members of that region and their concerns. To cut that cord is to inhibit the community, inhibit the communities affected from voicing their concerns through one of the most direct channels they have. Deference to the regional councils, and therefore community members, is written into ANILCA Title VIII. Along that same way... Yes, sorry?

Robin La Vine:

Thomas? Can you wrap up your comments really quick? We passed your...comment period.

Thomas Smith:

Yeah, yeah. I would like to wrap up my comment here by thanking you all for your community, continued engagement on behalf of your communities, and the constant drive to help our beautiful state. I look forward to a future with all of you, the work you have done, and once again, to thank you guys for all of the work you've done to keep this process. Thank you guys so much. Sorry.

Kara Moriarty:

Thank you. Thank you, Thomas, and thank you for your interest and application as a youth representative on the RAC. I knew your name sounded familiar for a reason. Thank you.

Thomas Smith:

Hopefully it'll be there for more.

Robin La Vine:

We are now going to go back to the room. Just to give everybody a status update, we have, I believe 13 online yet and about 24 in person before everyone has had an opportunity to provide their comments. In the room, next is Carrie Stevens.

01;04;43;28

Carrie Stevens:

Good evening, my name is Carrie Stevens, S-T-E-V-E-N-S, Fairbanks. I just want to say that I very much appreciate the shared concerns of the SCI petition for Alaska's people, Alaska's wildlife, and Alaska's fish. Yet, we have not seen SCI in this room before. My decades of coming to Federal Subsistence Board and RAC meetings, and they don't participate. I feel that we share the same concerns, but their solutions are ill-advised by lack of knowledge and participation. We read everything thoroughly, including the petition, all of us in this room, and there are many concerning pieces to the petition that demonstrate SCI is missing some really fundamental parts of the process that already exist.

So, I really want to applaud everyone who attends these meetings regularly for decades, just so you can eat, and so you can fish, and hunt, and be on the land and water. It's rough out there, so we do share the same concerns. And I wish that everyone from SCI was still here to hear that, yes, we do read, and we are more than abundantly aware of the crisis on the ground. That's why your map is all red because there is very little left. And we agree,

healthy wildlife, healthy fisheries, feeding Alaskans, science over politics. Every other administration to lead a federal subsistence management review agreed with the same actions that were taken under the last administration to increase Alaskan Native and subsistence users on the Board, and we applaud the addition of the three tribal seats. And they have called for more staff and more inclusion, not the opposite. This is all said federal, previous reviews, so I suggest that you read those as well.

The solutions posed by SCI, I'm very confused. They say they're driven by science. They seem very politically motivated. All of the actions of the Federal Subsistence Board follow the law to the T, as is their legal record. The State, this deference to this State, the State has a seat on the Interagency Staff Committee. The State has an equal say. The State sits at the table. The State has opportunity for rebuttal.

I also really encourage SCI to read any analysis done by OSM, and I applaud them with their very limited staff for their thorough reviews before they would ever make a closure. No one wants any closures. This is because there is no fish and wildlife on the ground. Sheep, caribou, moose, salmon; really appreciate our friend who said they can't be here to speak. And simply put, in state areas of management, there's nothing left. There is no Yukon River salmon. So, I don't see how deference to the State of Alaska, ADF&G, gets us better science. Many scientists have stated they finally went to Board a Fish and Board of Game meetings. None of that science is peer reviewed.

So, I see you standing up. I will wrap up. I have many other comments as everyone else, but I just want to say that all previous reviews have said to add Federal Subsistence Board seats for the users. They bring this direct knowledge, they bring the science, and they have dramatically improved the meetings and the science.

And so, we must keep them, and we cannot defer to the State. They're not upholding their own constitutional priority for subsistence. And I very much appreciate all of the federal subsistence staff. And if we want better science and we want less closures, we should fully fund the Office of Subsistence Management, so they are not understaffed and it's not a political pawn. Because this to me is not science or wildlife or fish, this is politics, this petition. Thank you so much, Kara. You have been gracious all night.

Kara Moriarty:

Well, thank you. Thank you, thank you for the compliment. I'm just trying to do my best to represent the Secretary of the Interior as best I can. So, I appreciate it, and thanks for coming down from Fairbanks.

Robin La Vine:

Thank you. Next in the room is Olivia Henaayee Irwin.

01;10;19;13

Olivia Henaayee Irwin:

[Spoke and introduced self in Alaska Native language]. Good afternoon, everyone. My name is Olivia Henaayee Irwin. I am from Nenana, Alaska. I am Inupiaq and Koyukon Athabaskan and a tribal member of Nenana Native Council. I am here today to testify solely on behalf of myself as a tribal member. I want to make that clear. I also would like to reiterate comments from previous testifiers, noting the time frame. Specifically, I would like to say that it is very important for us as tribal individuals to acknowledge and recognize where we come from, to give our traditional introductions, and forcing us to choose whether to give a traditional introduction or give a three minute testimony, forces us to choose whether or not to respect your system or our own values. So, I just wanted to add that before I get started.

I would like to specifically comment on the composition of the Board make up. I want to be very clear and would like to remind the Secretary of the Interior of the unique political status of our tribal people. Tribal participation and federal subsistence management is based on our political status, not a racial status. Tribes are federally recognized governments that have a unique government-to-government relationship established under the federal trust responsibility. When Tribes appoint representatives, they are exercising sovereign governmental authority, not creating race-based preferences. Any framing of tribally appointed seats as racially exclusive undermines federal law and the government-to-government relationships tribes have with the United States.

Tribes are not stakeholders. They are the stewards of the traditional and local knowledge tied to a specific place and resources. That knowledge is intergenerational, cumulative, and rooted in lived experience and relationship to and with the land for 10,000 years. Tribal representatives highlight realities that cannot be captured by data alone, including run timing, shifting in ice and river conditions, impacts to food security, and how regulations affect our ability to practice our traditional ways of life and our sharing networks.

Advisory input is important, but advisory processes alone are not sufficient enough. Tribal seats ensure that knowledge is present at decision-making table tables and not filtered or summarized after the fact. The federal trust responsibility requires the United States to protect tribal rights and resources and our ways of life. The consequences of diminishing or

removing tribal seats would be to diminish tribal sovereignty, weaken the government-to-government framework, and would increase the risk of decisions that will negatively affect our people and animal populations and disconnect policy and regulation from the actual experience of fishermen and hunters that are on the ground. That outcome would undermine trust, traditional ecological knowledge, and long-term sustainability measures.

In closing, I asked the Secretary to make no changes to the composition of the Board and uphold the years-long efforts of tribes and organizations to ensure tribally appointed representation on the Board. The tribally appointed seats are not about preference or exclusion. They are about lawful government and informed decision-making. I would also like to note that as tribal people, we don't get the choice to be immune from politics. We are inherently ingrained in politics. Thank you.

Kara Moriarty:

Thank you, Olivia.

01;13;51;05

Robin La Vine:

Next person in the room before we go back online, Charlie Wright.

01;14;04;26

Charlie Wright, Yukon River Inter-Tribal Fish Commission:

I first would like to acknowledge the chiefs and past chiefs in the room. And say thanks to the peoples of this land for letting us gather here. So, I'll start with saying my name is Charlie Wright. I serve on many, many boards on hunting and fishing. I have been doing this for a long time, and one of my hats I wear is the chair of the Yukon River Inter-Tribal Fish Commission.

And the Fish Commission was founded in 2015 in response to the big decline of salmon on the Yukon River. At the time, the runs were the lowest they've ever been for kings. So I'm just, I just want to use this as an example of how important our traditional knowledge is and local knowledge. Now today, there's almost no king salmon left in our river on the Yukon and its tributaries. The U.S. Fish and Wildlife Service has deferred salmon management to the State of Alaska up until 2021, to the point where there's not even enough fish left in the river for rural subsistence users to fish. Period. The Yukon River peoples have warned the State about the pending fish crash since the 1980s and 90s, a collapse the elders long predicted. People up the river began warning about the significance in early 2000s, and

when the fish crashed in the early 2010s, it was our communities that the State blamed, accusing us of overharvesting and falsifying our harvest reports.

This is why the RACs are so important because we have local traditional, local knowledge and traditional knowledge. The RAC members know and see the changes over time, and they see what's going on with all the resources on the land, the same as the people that sit on the Subsistence Board. They know; they live on the land. They know what's going on. It's important. Nobody can enjoy these resources unless we manage them properly. And, you know, we're all connected to salmon, and the whole state is connected through salmon, I'll say.

And I want to talk about the special action requests. They're very, very important to the people, and the animals, and the fish. The ability to stop fishing and hunting when numbers get so low, if we didn't have this ability, then we'd have more extinction going on right now. I think that the special action request is a wonderful tool. And I know that the Federal Subsistence Board does a really good job of making sure that that's done right. And I wish I had some more time to go on, but I see that I'm already over my time. Oh, no? Okay, thank you. [Laugh]

Kara Moriarty:

Yeah, Charlie. You're a pro. You're okay.

Charlie Wright:

Okay well, thank you for your time, and I'll be putting in a written comment also to get the rest of my comments in. And I appreciate your guys' time. Thank you.

Kara Moriarty:

Thank you, thank you. It's nice to meet you in person. I think we've met virtually, and I appreciate your service to the RAC. Thank you.

Robin La Vine:

We're going back online. Will the person with the last four digits of 2866 please introduce yourself. 28...

01;17;48;26

Clarence Peel:

Hello, this is Clarence Peel.

Kara Moriarty:

I'm sorry. Can you say your first name again? I did not catch it.

Clarence Peel:

Clarence Peel.

Kara Moriarty:

Oh. Thank you, Clarence. We can hear you just fine.

Clarence Peel:

I'm a resident of Hydaburg, southeast Alaska. You know, I haven't participated much in the subsistence information, but I do a lot of subsistence, and Hydaburg is a pretty rural community. I wanted to speak on some of the stuff that the community people on the Board, you know, Tony Christianson is one of the most respected community members. He is very well known in southeast Alaska for many different things. I mean, Tony is a well-rounded leader here in Hydaburg. He teaches a lot of subsistence to a younger generation, and he participated since he was a child. So having that information on the knowledge on the Board, gives us the upper hand of more respect of the people that actually have been here for generations. I know that's been said quite a few times here tonight, but the connection between the community members on the Board is they are us and we are them, you know.

I mean, I've done a lot of stuff with Tony Christianson in the past, and there's one story that I have that I wanted to point out. Tony and I had to go on a search and rescue mission one evening. We had to climb a mountain at, like, 12:30 in the evening. We had to climb a mountain for two people. One of them was our cousin, and the other guy was a person in the community here. And they were both hunting, and they got stuck up there that evening. So, at 12:30 at night, Tony, I, and another community member here charged up that mountain with flashlights in our hand and a rifle.

And the man, having somebody on that Board that understands what we go through in this entire Southeast or Alaska – this is some of the most dangerous stuff that we have to do to get our subsistence. And having somebody that the communities could trust brings trust to that Board, and our community, and the people for the government. You know, if you take our voice off that Board, it can damage everything. I see a lot of different things that could happen in this scenario. And fighting for our own lives right now, as it stands, is hard for us. And if you take our voice off that Board, it's going to be one of the worst things that we could deal with. We, the town suffers; our communities, our villages suffer. And just having those

community members builds a lot more trust than anybody could even imagine. So, I would please reconsider taking our community members off of the Board. Thank you.

Kara Moriarty:

Thank you, Clarence. And I just want to reiterate. This is, there are no proposed changes at this time. We are seeking comment on what people think about these ideas, but there is no official rulemaking on the table at this time. So just want to clarify that. Thank you.

Clarence Peel:

Oh, thank you so much.

Kara Moriarty:

And also, while I still have the mic, for those that you may know her, Amber Ebarb, from the Senate Indian Affairs Committee, she's a long-time staffer in DC, has also been online and listening.

01;21;44;25

Robin La Vine:

Next person online has the last four digits of 7436. 7436, please introduce yourself. 7436, are you still online? You can press *6 to unmute yourself. I will move on to the next person online. If 7436 comes back and speaks up, we'll see if we can find that person another place in the queue. But the next person online is Vivian Korthuis.

01;22;56;00

Vivian Korthuis, Association of Village Council Presidents:

Hi Kara, can you hear me?

Kara Moriarty:

I can hear you just fine. Oh, look, and I can see you, too. Hi Vivian, nice to see you.

Vivian Korthuis:

Hi. Hello, ladies. My name is Vivian Korthuis. I serve as the Chief Executive Officer for the Association of Village Council Presidents, and I've been on for about 3.5 hours listening to everyone and waiting to provide my testimony. I just want to note that we are going to submit a written document, a written testimony, and I'm just going to pick out of our testimony some highlights, and I will not be able to read the whole testimony in whole. So, on behalf of the Association of Village Council Presidents, thank you for the opportunity to

provide comments as part of the Secretary's review of the Federal Subsistence Management Program.

AVCP represents 56 federally recognized tribes in the Yukon Kuskokwim Delta region in western Alaska. In our region, subsistence is who we are. Subsistence is the foundational component to our food security, culture, public health, and our survival. Let there be no confusion, absolutely no confusion, either intentional or unintentional, that subsistence is our way of life since time began, and we will fight to protect it. I just want to make that comment because I heard earlier in the testimony that there was some confusion. From here where we stand, there is no confusion.

The Federal Subsistence Management Program exists because Congress recognized that rural subsistence users require enforceable protections under Title VIII of ANILCA and because the State of Alaska has been unable to implement those protections in a manner consistent with federal law. For decades, the federal program has served as the only mechanism that meaningfully protects the rural subsistence priority for rural Alaskans on federal lands and waters.

AVCP supports maintaining a majority of public members and with subsistence expertise and preserving tribal nominated seats to safeguard lived knowledge and the rural priority. We oppose any shift that would dilute public tribal representation or elevates State deference over Title VIII's mandates. I am not going to read the whole, all my comments because I know that I'm already coming to the end of my three minutes.

I just want to end by saying AVCP emphasizes that subsistence management decisions cannot be divorced from the lived realities of our Alaska Native communities. These realities include the salmon crash that has caused declining salmon runs, climate-driven ecosystem changes, extreme food costs, food insecurity, and increasing threats to food security and public health. Any effort to revise or restructure the subsistence management program without direct input from our tribes would be deeply flawed.

On that note, I wanted to share with you that I asked staff how much money would it take for our region to fully participate in this open house? So, for our region to fly 56 member villages/tribes to Anchorage for this session would cost over \$105,000. That's almost impossible when we do not have budgeted funds for these kind of open houses to participate in.

So in closing, we would like you to, we would like, AVCP would like to invite you to come to Bethel for direct consultation with our tribal membership in the YK Delta to talk about these issues that are important to all of us. So with that, I will submit a written comment, and I will thank you for your attention.

Kara Moriarty:

Vivian, thank you for your patience and for your leadership in your region. I take your comments to heart, and we'll see what we can do as we schedule tribal consultations. I'm not sure what my own budget is, but I take your comment and suggestion to heart and would love to come to Bethel to see you in person if I can make that happen.

01;28;30;00

Vivian Korthuis:

Okay. Thank you so much. We would be very happy to have a consultation, and we would help facilitate that in our region. Quyana.

Kara Moriarty:

Thank you.

Robin La Vine:

Next online is Ida Nelson.

01;28;52;24

Ida Nelson:

Waqaa. [Spoke in Yupik language]. Hello, my name is Ida Nelson, and I am from Igiugig, Alaska. I am a single mother of five children, and I rely on the ability to subsistence hunt and gather to provide food for my family and their needs. I live in an area where freight costs \$1.20 a pound. Gasoline is \$9.47 a gallon. Diesel to heat our homes is \$9.87 a gallon. I subsistence hunt and our family subsistence hunts for caribou and moose in our area. My family would much rather eat the foods that are either hunted by my daughters or caught in the net. We rarely eat beef and pork in our home due to the cost of food and the amount of freight it costs to fly out here.

I'm not a fan of turning our way of living into a sport. It'll take away from my family and the lifestyle that has sustained us for generations to come. Our lifestyle in Alaska should never be considered a sport just because billionaires want to, want to enjoy that sport.

Unfortunately, it's because it's our way of life. It isn't their way of life. We live differently and sustain a way of, a way since time immemorial.

Me and my family wish to keep our subsistence rights for many generations to come. I also believe that the Federal Subsistence Board is balanced and should remain as is. I also acknowledge the three newly tribally nominated public members in 2024.

I have also lost trust in the Alaska Department of Fish and Game, and they should have no role in the federal subsistence management. I also believe that the State should not have a seat at the Federal Subsistence Board or any federal subsistence management decisions.

I also believe that 60 days scoping period is not enough time to allow proper government-to-government consultation process to occur. I ask that the comment period go from 60 to 90 days to allow for sufficient consultation process, prior to sufficient consultation process to, prior to the close to critical comment period to review the process. Thank you for your time and have a great evening.

Kara Moriarty:

Thank you, Ida.

01;31;15;06

Robin La Vine:

We return to people in the room. Next in line is Ben Mulligan.

01;31;30;14

Ben Mulligan, Alaska Department of Fish and Game:

Good evening. For the record, my name is Ben Mulligan. I serve as Deputy Commissioner for the Alaska Department of Fish and Game. Across the nation, states are the primary managers of fish and wildlife within their borders. These same rights were bestowed to the State of Alaska by our Statehood Compact and reaffirmed under ANILCA. Nevertheless, the State of Alaska's role has largely been supplanted by the Federal Subsistence Management Program, far exceeding the narrow federal authority ANILCA provides. Regulatory reforms are necessary to restore the State's proper role as the primary manager of Alaska's fish and wildlife.

Under the president's Executive Order, *Unleashing Alaska's Extraordinary Resource Potential*, it directs the Department of the Interior to conduct meaningful consultation with the Alaska Department of Fish and Game prior to enacting land management plans or regulations affecting hunting and fishing opportunities on public lands and, to the greatest extent possible, ensure hunting and fishing opportunities on federal lands are consistent

with those on state lands. This directive was reinforced by Secretarial Order 3447, which calls for removing unnecessary barriers to hunting and fishing, expanding access where compatible, improving coordination with state agencies, and ensuring transparent review of any proposed restrictions.

ANILCA Section 1314(a) explicitly states, “Nothing in this act is intended to enlarge or diminish the responsibility and authority of the State of Alaska for management of fish and wildlife on public lands except as may be provided in Title VIII.” Title VIII provides only a narrow exception, allowing the Secretary to restrict state authorized harvest when necessary to meet the subsistence needs of federally qualified rural residents.

Section 8022 established the policy that non-wasteful subsistence use of fish and wildlife and other renewable resources shall be the priority consumptive use of all such resources on the public lands of Alaska when it is necessary to restrict taking in order to ensure the continued viability of a fish and wildlife population or the continuation of subsistence uses of such population.

Section 804 reiterates this policy and establishes criteria to implement a priority when the above conditions are met. Unfortunately, the program has expanded this limited authority into broad preemption, supplanting state management with federal management and imposing closures, opening off-season hunts, and adopting other methods and means regulations far beyond what ANILCA allows.

This dual regulatory system has confused the public, complicates management, and impedes the State's constitutional mandate to manage fish and wildlife for the maximum benefit of all Alaskans. The Department has submitted formal written comments that recommend reforms to the Board's regulation and regulatory process, as well as to its membership and powers, a way to promote the use of RACs through elections, and to strengthen the State's involvement in the process. We stand ready to work collaboratively with the Departments of Interior and Agriculture, the Federal Subsistence Program to restore a cooperative, lawful, and effective subsistence management framework in Alaska. Thank you.

Kara Moriarty:

Thank you, Deputy Commissioner. Appreciate you coming.

01;34;53;08

Robin La Vine:

Next in-person, David Leslie.

01;35;06;25

David Leslie, Northern Alaska Environmental Center:

Hello there, I am David Leslie. I am speaking today on behalf of the Northern Alaska Environmental Center where I'm the Board Secretary. I'm also Inupiaq. My mom was born in Qikiqtaġruk, also known as Kotzebue. And the Northern Center is in Fairbanks on the Tanana-Dene lands. And I'm thankful to be here on the Dena'ina lands.

Life is so difficult in rural Alaska without having proper access to a subsistence hunting and traditional lifestyle. The money, health care, and food costs would make it unlivable, which it already is becoming more and more. People are leaving due to financial restraints, having to go to school, unable to find or afford health care. And this has been happening ever since the colonization of Alaska. This is a slow ethnic cleansing of rural Alaska, of Alaska Native people. This is the genocide my elders told me has never ended. This is white supremacy.

We, the Northern Center, does not believe that the State should be the one managing these relationships with the tribal nations as nations require a nation-to-nation relationship, which the State of Alaska does not enjoy. It is, you know, it is only a state. And what this does is weakens tribal sovereignty across the entire United States and puts Indigenous people into different categories.

I want to also mention that this meeting was on the same day as Northern Pacific Fisheries Management Committee where we are dealing with the salmon crisis and the representation of the trawling industry final action and whether or not they will continue to allow a certain amount of bycatch of salmon while people in western Alaska are starving and reaching their financial limits from not being able to get salmon for so many years on end now. Having this happen at the same time is no coincidence. Also preparing for this, these meetings on the same day, at the same time, stretches both environmental groups and Alaska Native people so thin. Especially as the last month, as you know, has been the most difficult month for all of us as Americans in my lifetime.

Having to fight for our subsistence rights with two different agencies is unacceptable, which is why we are asking, like the other tribes have, to extend the comment period to 90 days. This has been rushed, just like the executive orders issued a year ago where the most executive orders at once were ever filed at one time. Just like the staff firings of federal employees was rushed and later found to be illegal. Just like the cutting of so many federal

programs and money was happening, was rushed and also could have possibly lost money. Environmental stewardship, which Indigenous people are the stewards of the land, should not be rushed.

We need to support tribal seats, not white supremacy, and keeping traditional knowledge involved in this program is science, just as much as Western science is. Without this land, we do not have...without Indigenous people on the island, we do not have the... Without the Indigenous people on this land, we do not have a functioning ecosystem or environment. We are a part of it and thank you. Thank you for your time.

Kara Moriarty:

Thank you very much.

Robin La Vine:

I'm so very aware of my role in rushing. So, our apologies again. We have one last person in the room, not last, but before we move online. Next person is Regina Lennox.

In the room:

I'm also in the room, and I signed up.

01;39;46;12

Robin La Vine:

Oh, no, I meant, I meant, before we go online. Yeah, sorry.

Kara Moriarty:

Yeah, sorry. Sorry for that. So, Regina, so Regina will go, and then we'll go online. I'll also say, as I mentioned at the beginning, I cannot sit for more than two hours at a time without a bio break. So, once we get to 7:00, we'll take a break, and then we won't be through everybody. So, then we'll come back at, like, 7:10. So just for planning purposes. Thank you, Regina.

01;40;22;11

Regina Lennox, Safari Club International:

All right, and good evening to everyone. My name is Regina Lennox, and I represent Safari Club International and the SCI Center for Conservation Law and Education. SCI is a nonprofit organization with members and advocates worldwide, including three chapters and roughly 1,300 members in Alaska, many of whom are federally qualified subsistence users. The Alaska Chapter here in Anchorage is the single largest SCI chapter.

SCI submitted a petition to the Departments of Interior and Agriculture requesting changes to the Federal Subsistence Management Program and the Board structure. To be absolutely clear, SCI's petition did not seek to repeal or reduce the rural subsistence priority. Neither department has the authority to make such a change, only Congress does. To our knowledge, Congress is not considering and has never considered any such change, and SCI has never advocated to eliminate or lessen the subsistence priority. In addition, contrary to some things said earlier, SCI has never suggested that the subsistence priority is race based. It could not be because almost half of federally qualified subsistence users are not Alaska Native.

The goal of the SCI's petition is simple: to restore the Board to operate within the limits Congress set in ANILCA. ANILCA explicitly protects the right to hunt and fish for all users. It does allow restrictions on non-subsistence harvest, but those restrictions must be, quote, necessary either for conservation to protect the subsistence priority or for health and human safety. But the Board has increasingly closed or restricted access to huge areas of public lands, often contrary to science presented by the State and beyond ANILCA's limited closure authority. That overreach is unlawful and has improperly restricted subsistence and non-subsistence users alike. So, SCI has requested several changes to the program.

First, SCI supports restoring the Board's composition to its original structure, limited to representatives from the five federal land management agencies. In 1992, when the Board was created, the Secretaries acknowledged that ANILCA does not authorize the delegation of authority to members of the public. Commenters sought to add public seats, but the Secretaries responded that ANILCA intended for meaningful public input to come from the RAC process and does not, quote, provide mechanisms for including rural Alaska residents beyond the scope of the advisory system.

Second, SCI supports improving the role of RACs in the subsistence management program by revising the RAC appointment process, not the criteria for membership, to clearly rely on local nominations through a transparent process. Right now, nominations are taken in an opaque process by federal bureaucrats and not by local residents putting those folks forward. And increasingly, the local representation and RAC nominations will better promote meaningful local participation and adhere to the fairly balanced membership requirements of the FACA.

Third, SCI supports holding the Board within the bounds of ANILCA. That was Congress's intent, and any actions that the Board takes outside of ANILCA's authorization are unlawful.

In ANLCA, Congress preserved the State's responsibility and authority for management of fish and wildlife on public lands. It also repeatedly required consultation with the State. Despite these directives, the Board has repeatedly ignored the State's science. It has made decisions, I know, I'm almost done – two seconds. It has made decisions counter to the state scientific data and shut down non-subsistence harvest as well as subsistence harvest for reasons unrelated to conservation, the need to protect the subsistence priority, or health and human safety. These closures are not harmless. SCI supports revision of the regulations to require meaningful consultation with the State on actions necessary for the conservation of fish and wildlife, and that the Board should not be able to override state recommendations unless it can provide substantial evidence from credible sources supporting its decision. That certainly does not include, that certainly does not preclude the use of other data, including traditional ecological knowledge. It just requires the Board to have such data before it makes decisions closing millions of acres to all but local users.

Fourth, SCI supports the elimination of duplicative federal regulations that mirror state regulations, and SCI supports limiting emergency and temporary special actions to truly emergency and temporary situations. Thank you very much for this opportunity.

Kara Moriarty:

Thank you, Regina, and I appreciate and hope that you plan to submit that. Thank you.

01;45;08;26

Robin La Vine:

We are now going back online. The next person to provide comment is Bruce Ervin.

Bruce Ervin:

Hi, can you hear me okay? Okay, thank you, Kara. And, sorry, Crystal. I don't see your name right, Ciisquq?

Crystal Leonetti:

Ciisquq. Thank you, Bruce.

Bruce Ervin:

Ciisquq, Ciisquq. Thank you, Kara and Ciisquq and to the staff and everyone who made this opportunity possible. My name is Bruce Ervin. I'm an Upper Tanana-Dene, and I'm a rural resident of Tok, Alaska. But I also like to acknowledge the Upper Tanana-Dene Indigenous lands where Tok is located. Today, I would like to provide my rural perspective on how

important and necessary the Federal Subsistence Management Program and Federal Subsistence Board is for our rural Alaskans.

I'd like to start off with the move of the Office of Subsistence Management. This was a recent move, and I've heard positive things like better communication and that things are working well. I support leaving OSM in its current location.

As for the criteria for Regional Advisory Council membership, I feel that it is important to have people from those areas as RAC members because they're out on the land and are able to share their way of life and provide important updates on the conditions of those areas. I do believe that more outreach is needed to help those people from the 10 RAC regions apply and fill those important seats.

I would also like to talk about the membership of the FSB. Currently, the way the FSB is structured has brought balance and allowed rural residents to have a voice at the table. It would be detrimental to go back to the original structure of the FSB. Alaskans have fought hard to get to where we are today. So, I ask you to keep the current membership structure at the FSB because it allows more public involvement in the process.

As per the federal regulations-the state regulations for duplication and inconsistencies concern, rural Alaskans know and understand that we live in a dual management reality. Federal and state regulations are unique and cannot be boxed up into one book. With rural preference, there are different regulations that do not apply to the State. The seasons are different, and these regulations help early Alaskans in rural areas put food in their freezers. What might look like a duplication is not really one. Federal regulations are there for good reason and should not be mixed up with state regulations.

The topic about regulations applicable to special actions is important. Point blank, special actions are important tools for managers and should be used to protect resources. Special actions protect our wild relatives and protect our rural Alaskans and their ways of life.

For the role of State of Alaska, ADF&G, in the Subsistence Management Program: today, we have a federal subsistence program and FSB because the State cannot legally manage subsistence of the rural preference. The State should not have the ability to vote for federal subsistence management as a member of the FSB is not on the Board of Game or Fisheries. It is important that local voices are heard in these processes.

For the topic of Board policies and procedures for rural determination, I believe it's important to seek guidance from the RACs and what is considered rural because they have knowledge of the area. I lived in Anchorage and Fairbanks before, and before moving back to Tok. Living in Tok, I have learned the importance of rural preference. If I ever moved back to Anchorage, I would be comfortable not having rural preference because I know that the rural people that live there really need it.

Lastly, outsiders showing up and trying to change things, so that they can benefit financially is so disrespectful to all rural Alaskans. I'd also like to say that it is important to include and listen to communities that are being impacted by this review. Thank you for making this possible. We rural Alaskans know what is best for our ways of life, and we know how to bring balance and how to protect our land, water, and air relatives. Thank you for your time. Thank you for making this opportunity available and letting me provide my rural perspective. Tsen'ii. Thank you.

Kara Moriarty:

Thank you, Bruce.

01;49;56;25

Robin La Vine:

Next from online, we have someone labeled as Unknown User. If you recognize that identifier as yours, you're next in line. Unknown user. You can press *6 to unmute yourself. Likewise, if anyone else has joined us later in this evening's session, and you want to provide comments, you can do so by pressing *5 or raising your hand through the Teams app. Next in line is Michael Opheim.

Michael Opheim, Chugach Regional Resources Commission:

Good evening, my name is Michael Opheim. I'm the Tribal Fish and Wildlife Liaison for Chugach Regional Resources Commission. I want to thank everybody for making this possible and the process. I'm probably gonna make this short. We will be submitting a comment letter to the folks here.

But, you know, we're pretty happy with how things are going with the federal subsistence system. The RACs are made up of people that live in the areas, that know the knowledge of the game on the ground, and gives voice to those communities. Without that, it just wouldn't be the same. And with the three new seats, it does bring some, I'll say clarity, to the Federal Subsistence Board, and we support that. So, with that, I will say thank you and that we will be submitting our comment letter. Have a good evening.

Kara Moriarty:

Thank you, Michael.

Robin La Vine:

Next online is Ian Johnson.

01;52;22;29

Ian Johnson:

Great, you can hear me?

Kara Moriarty:

Yep. Can hear you just fine, Ian. Go ahead.

Ian Johnson:

All right, thank you. My name is Ian Johnson. I'm a resident in Hoonah, which is west of Juneau, on the north end of Chichagof Island on the traditional lands of the Xunaa Káawu who have stewarded these lands for, you ready for this – 3,650,000 days, which is 10,000 years – if you think about it in days.

I rely on subsistence fish and game for my household. Last week, I was blessed to add two deer to my family's freezer, harvested under federal subsistence regulations extending our hunting season. I purchased almost no red meat and count on access to deer, salmon, and halibut as my staple foods.

My only comment on the legality of the request being considered is I do not believe it upholds Title VIII of ANILCA. After reviewing many documents released leading up to this meeting, I see no benefit to rural Alaskans in the proposed changes. These changes only cause confusion, erode public trust, and degrade rural voices and Indigenous voices and policy.

I'm calling to testify against the proposed changes to the makeup of the Federal Subsistence Board, the qualifications of the RAC members, and proposed deference to the State of Alaska. None of these things strengthen our way of life, rural voices, or create a process that is effective. Just for context, I have served as a member of the Southeast Regional Advisory Council and currently sit as a secretary for the State Advisory Committee. So, I'm well aware of the two types of policy, and I have a strong opinion of which is better, which is the federal subsistence system.

This petition process and its origins by SCI are tinged by the idea that radical rural Alaskans are being placed on a Federal Subsistence Board and that the RACs are influenced, are influencing a radical agenda. I have three questions to that and in response, which is first, are we radical because we live in this place with its original stewards of over 10,000 years and care about a deeply? Are we radical because we know exactly what is impacting our ability to thrive in rural Alaska and are asking for change? And are we radical because our elders remember what it used to be like and are devastated to see its current state?

This notion of a radical board is just incorrect for the RAC in Southeast Alaska, as that's the one I'm most aware of, and the vetting process for these positions is thorough, especially in comparison to the state election for State Advisory Committees, which can be weighted to support personal use or commercial use depending on who shows up on election night. Maintaining rural voice on the Board is critical. We live in this place, have our finger on the pulse, and rely on active management that meets local observations for population size and concerns of access to those populations.

In regards to State deference, the State process for Board of Game proposal review is highly political, gives preference to commercial and sport interests. The Board of Game and Board of Fish process, that process: does not allow for remote testimony; often disregards science and monitoring, and I would especially point to fisheries resources like herring and king salmon; does not recognize real priorities or subsistence; and highly disregards local voice in the process. Giving the deference to the State will erode trust and bury public input in, inside of political decision-making. Deference to the Regional Advisory Committee is appropriate and should be continued.

Last, I would like to comment specifically on the attack of the Kake moose hunt that was authorized by the Federal Subsistence Board. This was cited as an example of overreach within the SCI petition. It is not an example of overreach, and it's an example of a working system. Our community food chains were crushed by the food chain collapse during COVID. Granting a moose to Kake wasn't just the right thing to do, it was the just thing to do and is a perfect example of how federal management should be responsive to community emergencies; in this case, emergency food shortage due to a global pandemic. Perhaps SCI was simply jealous of Kake residents to fill their freezers or perhaps misinformed about the true effect of the global pandemic on rural Alaska and unable to acknowledge that subsistence isn't about poverty. It's about wealth and resilience in hard times. Thank you.

Kara Moriarty:

Thank you, Ian. So, I think we'll take a bio break here. It's 7:06. We'll resume at 7:15.