



NORTHWEST ARCTIC SUBSISTENCE
REGIONAL ADVISORY COUNCIL

*March 9-10, 2015
Kotzebue, Alaska*



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On the cover...

A robust caribou enjoys crunching lichen.



Carl Johnson, USFWS

NORTHWEST ARCTIC SUBSISTENCE REGIONAL ADVISORY COUNCIL

March 9-10, 2015
11 a.m. on March 9, 9 a.m. on March 10
Northwest Arctic Borough Chambers
Kotzebue, AK

TELECONFERENCE: call the toll free number: 1-877-638-8165, then when prompted enter the passcode: 9060609

PUBLIC COMMENTS: Public comments are welcome for each agenda item and for regional concerns not included on the agenda. The Council appreciates hearing your concerns and knowledge. Please fill out a comment form to be recognized by the Council chair. Time limits may be set to provide opportunity for all to testify and keep the meeting on schedule.

PLEASE NOTE: These are estimated times and the agenda is subject to change. Contact staff for the current schedule. Evening sessions are at the call of the chair.

AGENDA

*Asterisk identifies action item.

- 1. **Roll Call and Establish Quorum** (*Secretary*)..... 4
- 2. **Invocation**
- 3. **Call to Order** (*Chair*)
- 4. **Welcome and Introductions** (*Chair*)
- 5. **Review and Adopt Agenda*** (*Chair*) 1
- 6. **Election of Officers***
 - Chair (*DFO*)
 - Vice-Chair (*New Chair*)
 - Secretary (*New Chair*)
- 7. **Review and Approve Previous Meeting Minutes*** (*Chair*) 5
- 8. **Reports**
 - Council Member Reports
 - Chair’s Report
- 9. **Public and Tribal Comment on Non-Agenda Items** (available each morning)
- 10. **Old Business** (*Chair*)

a. Rural Determination Process Review – Secretarial Proposed Rule* (*Anthropology*) Supplemental

b. Customary & Traditional Use Determination – Southeast Council Proposal (*Anthropology*) Supplemental

c. Refuges Proposed Rule on Hunting* Supplemental

d. National Park Service *Subsistence Collections and Uses of Shed or Discarded Animal Parts and Plants from Park Areas in Alaska** 12

11. New Business (Chair)

a. Wildlife Closure Review*

 1. Wildlife Closure Review Briefing 15

 2. Wildlife Closure Review WCR14-27 16

b. Call for Federal Hunting and Trapping Regulatory Proposals* (*OSM Wildlife*) 21

c. Funding Notification – Fisheries Resource Monitoring Program Supplemental

 1. FRMP Projects 12-104 and 14-103 (*Brandon Scanlon*) Supplemental

d. Review and Approve FY2014 Annual Report* (*Council Coordinator*) 22

e. Charter Revisions* (*Council Coordinator*) 24

12. Agency Reports

(Time limit of 15 minutes unless approved in advance)

Tribal Governments

Native Organizations

USFWS

 Selawik National Wildlife Refuge Update (*Susan Georgette*)

NPS

 Gates of the Arctic National Park Update (*Marcy Okada*)

 Western Arctic Parklands Update (*Ken Adkisson*)

BLM

 Fairbanks District Office Update (*Staff*)

ADF&G

 Update (*Staff*)

OSM

 NPFMC Presentation on bycatch issues (*Staff*)

13. Future Meeting Dates*

 Confirm date and location of fall 2015 meeting 28

Winter 2016 All-Council Meeting Update (*Meeting Committee*)

14. Closing Comments

15. Adjourn (*Chair*)

To teleconference into the meeting, call the toll free number: 1-877-638-8165, then when prompted enter the passcode: 9060609

Reasonable Accommodations

The Federal Subsistence Board is committed to providing access to this meeting for all participants. Please direct all requests for sign language interpreting services, closed captioning, or other accommodation needs to Melinda Burke, 907-786-3885, melinda_burke@fws.gov, or 800-877-8339 (TTY), by close of business on February 26, 2015.

DRAFT

REGION 8
Northwest Arctic Subsistence Regional Advisory Council

Seat	Year Apptd <i>Term Expires</i>	Member Name and Community
1	2010 2016	Raymond Stoney Kiana
2	2014 2016	Austin Swan Kivalina
3	2011 2016	Hannah Loon Selawik
4	2010 2016	Michael C. Kramer Kotzebue
5	2008 2017	Percy C. Ballot Sr. Buckland
6	2011 2017	Verne J. Cleveland Sr. Noorvik
7		VACANT
8	1999 2015	Enoch A. Shiedt, Sr. Kotzebue Chair
9	2014 2016	Enoch L. Mitchell Noatak
10	2012 2015	Calvin D. Moto Deering

MEETING MINUTES
Northwest Arctic Alaska Subsistence Regional Advisory Council
October 8-9, 2014
Community Building
Kiana, Alaska

Call to Order

Meeting called to order by Chair Enoch Shiedt Sr. at 9:17 a.m.

Roll Call and Establish Quorum

Hannah Loon called the roll.

Council members present: Raymond Stoney, Hannah Loon, Michael Kramer, Percy Ballot, Calvin Moto, Enoch Shiedt, Verne Cleveland, Enoch Mitchell

Excused: Walter Sampson, Austin Swan

Invocation

Hannah Loon led an invocation to all present at the meeting.

Welcome and Introductions

Chair Shiedt welcomed guests and staff members.

Welcome by Dale Stotts, Native Village of Kiana Tribal Director and Larry Westlake, Kiana Elders President

The following personnel and members of the public were in attendance:

Government Agency Employees

Jeff Brooks	U.S. FWS, OSM
Karen Hyer	U.S. FWS, OSM
Carl Johnson	U.S. FWS, OSM
Trent Liebich	U.S. FWS, OSM (via teleconference)
Chris McKee	U.S. FWS, OSM (via teleconference)
Susann Georgette	USFWS
Tina Moran	USFWS
Brittany Sweeney	USFWS (via teleconference)
Dan Sharp	BLM (via teleconference)
Glenn Chen	BIA
Ken Adkisson	NPS (via teleconference)

Marci Johnson	NPS
Jim Lawler	NPS
Mary McBurney	NPS
Marcy Okada	NPS (via teleconference)
Kumi Rattenbury	NPS (via teleconference)

Beth Mikow	ADF&G
Jennifer Yuhas	ADF&G (via teleconference)

Tribal Organizations

Larry Wassillie	
Dale Stotts,	Kiana Tribal Director

NGOs/Public

Barbara Aturuk	
Wilbur Atoruk	
Amber Borat, Sr.	Kiana High School
Thomas Jackson	
Frank Jackson Jr.	Kiana High School
Warren Morena	
Henry Schaffer Sr.	

Review and Adoption of Agenda

Additions/modifications: ADF&G, Elizabeth Mikow and Jim Dau
Motion to approve the agenda as amended by Percy Ballot. Second by Calvin Moto. Unanimous approval.

Review/Approval of Minutes

Percy Ballot: vote to approve the meeting minutes: second by Mike Kramer. Motion approved unanimously

Council Member Reports

Hannah Loon (Selawik): Caribou were present in Selawik in spring; fortunate. Whitefish and pike were in good shape; able to harvest both species. Has been a good cool weather in the summer—long enough to go sein for the fish river. Able to dry that fish well; thankful for a good salmon berry season. Blueberries not plentiful, some cranberries. Lots of erosion and too many beavers were observed. Look forward to caribou; we wait for females and young to pass through then bulls, as directed by the elders. Caribou were late coming. Jim Dau said the population has been low; caribou late in the fall but some families were able to harvest. Thank Kiana for

allowing us to meet here. It is good to have the meetings in the village—we can hear from the community and hear their experiences first hand.

Raymond Stoney (Kiana): Caribou hunt this year was 2-3 weeks earlier than last year; surprising. The migration was easier than last year. The herd is almost right in town now; so most of hunters from the surrounding communities were all successful and the caribou are in great condition. Glad harvest was successful this year. The salmon...hundreds died in squirrel and Kobuk Rivers. Nobody knows why they are dying. It has been a good fall-great weather the last 2 months. Hunting season for these villages is very important!

Michael Kramer (Kotzebue): We had a good spring, quick melt, lots of bird harvest. Good salmon run, it came through well. Severe desperation for people making sure they get their caribou—dangerous practices sometimes including boats getting cut off and close calls with firearms. Miscommunication? Uncooperative hunters? Desperation? Need to push for better predator control.

Percy Ballot (Buckland): Hunting is changing; people are getting careless—need to stress safety. Cultural days at home, take the kids out and teach them about hunting a few times a year; need to do more of those things. Great beluga program recently; lots of unknowns, but at least it is being discussed with representatives from the region. Beluga is mainstay of coastal people; belongs to everyone. Thank NWA Borough, Shell, and Arctic Slope Borough for funding. Volunteer river debris cleanup went well. During the winter the ice went way up, found lots of fish when looking for eggs; fish along Buckland flats—a bit unusual. Not many seals so far, but did see skinny seals on the banks. Some people wondering about hunting female moose in September. Caribou a bit late which resulted in a very short harvest time. Residents observed planes landing on the beaches near town—don't know who they are. Considering bounty this winter on wolves by the tribe to help the caribou population.

Calvin Moto (Deering): Unusual winter for hunting. January we had weather up to 40 above. Lots of floods; no planes for almost 3 days; landing strip needed boats to access it. Beluga did not come into the sound--climate change? Hard for locals to go out and hunt because gas is \$6.75/gallon. Fortunate that the high winds experienced in the area were south winds and no flooding occurred. Not many caribou seen in the area, but a few residents have had successful harvests.

Enoch Shiedt Sr. (Kotzebue): Successful Beluga harvest and berries were plentiful. Each family is trying to put food on the table. Race of activity in caribou season; we must respect each other to avoid conflicts. There should be a bounty again on wolves and bears—there are so many, they are breaking into camps.

Enoch Mitchell (Noatak): Thank to Kiana for hosting us here for the meeting. Had a late fall season again. People are finally pulling boats from water just a couple days ago and it is starting to freeze up. Summer had a small fire in our area; lots of fish in the river this year but too dry for berries. No successful harvest from the Western Arctic Herd--usually have caribou herd moving through by now. In early September there were boats headed toward Abrahams camp to hunt the Teshekpuk Herd but there were very few. Few boats from Noatak that came here this fall to hunt caribou with the lack of caribou in our area; it was successful and helped our people. Lots of families pooling resources together to get gas to harvest caribou. Long ago, we did not have these hardships; does not seem right. Lots of people did not get their caribou--may be a hard winter. We can do something about the man-made problems; more sport hunters than people

in the village. Proposal ideas: space sport hunting windows to give caribou a chance to cross. Limits on transporters coming into the Noatak rivers and space out the camps. Council response: transporters and outfitter conflicts an important topic. 40 years ago we never had problems until these outfitters and transporters began coming in--they are intercepting caribou. If they do not want the meat, they need to leave the harvest with the nearest community within 2 days before it spoils. These are the kinds of proposals we need to put together. Thanks to Kiana for providing for us again and being able to have the other communities hunt here.

Vern Cleveland (Noorvik): Very aggressive hunters and a large amount of boats in fall caribou hunt—never seen anything like this before. People from everywhere. Abundance of moose in my area; lots of bears. Lots of fish floating—dead ones; no oxygen.

805(c) Letter

The Chair reviewed and summarized the 805(c) letter and the Council thanked the FSB for supporting the Council's recommendations.

SRC Appointment

Motion to reappoint Louis Commack Jr. to the Upper Kobuk SRC. Second by Enoch Shiedt Sr. Motion approved unanimously.

Customary and Traditional Use Determination and Rural Determination Review Updates

Jeff Brooks (OSM) introduced the report "Understanding and Improving Collaborative Management of Fish and Wildlife in Western Alaska," which has now been finalized. There was an update provided on the Customary & Traditional Use Determination review and outlined the next steps in the process. The Council also discussed the FSB recommendations to the Secretaries for determining the rural status of communities.

Priority Information Needs for FRMP

Karen Hyer and Jeff Brooks (OSM) provided an overview of the process as well as the draft Northern Alaska Region Priority Information Needs and sought input from the Council.

- There are always many studies on whitefish, trout, and salmon. What about smelt or Tomcods. We have several trout near Buckland but never see any studies.
- Lakes packed full of whitefish. Do they spawn there? Some of those tributaries and coastal lakes need to be studied.
- Beaver, waters, fish. There is concern over beavers impacting spawning salmon and other resident species. Lots of room for partnerships with other agencies and how these resources relate to each other.
- There are fresh water mussels in Selawik River that were traditionally harvested and used. The Council is wondering if the current population could sustain harvest.

The list of priority information needs compiled on the first day of the meeting was modified in the evening and presented again to the Council the following day. Additional needs were brought up on the second day, discussed and added to the draft list.

Federal Fisheries Proposal

FP15-01:

COUNCIL RECOMMENDATION: Support

JUSTIFICATION:

The Council supports FP 15-01 and agrees with the proponent and the OSM preliminary conclusion. This type of gear has been used in the region for years, and is in favor of options for users.

Partners for Fisheries Monitoring Program

Karen Hyer and Jeff Brooks provided an overview of the program, outlining the 2015 notice of funding, seeking input for the strategic plan. The Council provided the following recommendations:

- A fluent elder who is familiar with the area should partner with the younger people. Elders have TEK and the youth are missing knowledge about their environment. Local knowledge is science—partner with the IRA councils; they will put you in touch with knowledgeable people.
- Percy: we have meetings once or twice monthly in the villages; special meetings sometimes with certain ideas. That is a good time to share what is going on with this program and opportunities
- Get schools involved—go to the communities, make them a part of it and hire locals! They are the experts from the village; each village is different. Follow up!!
- Partner up with these different events (health fairs, Inupiaq Days, etc.) and share information.
- Give examples! “What do you want studied around your village?” with a different letter going out to each community.
- Scientific data for the health of populations is what we need to be focused on. As well as contamination—need to focus on that.

The list compiled the first day of the meeting was modified and additional items were brought up on the second day. Additional resources and area were identified by Councilmembers and added to the draft list.

Recommended Changes to Nomination/Appointment Processes

Carl Johnson provided a briefing to the Council regarding the challenges and recommended changes to nominations/Appointments Process for RACs.

- This Council has made specific recommendations via the Annual Reports and actually had to change meeting dates last year to have proper representation at a meeting due to delays in the appointment process.
- The Council encouraged staff to correspond formally with the Village Councils—“not enough representation from your village for so many years. Encourage them to submit nominations.
- The Council is in favor of alternates, carryover terms, 4-year appointments, vetting authority on to be transferred to OSM. Hannah: even if some people have something unfavorable in their background, they should still be eligible to serve if they are willing and interested. People change for the better and grow over time.
- The Council pointed out the redundant nature of the application and interview process, especially for incumbent applicants. Old applications should be kept and reused if desired, and the questions should be re-structured.

All-Council Meeting in Winter 2016 and Pre-FSB All-Chairs Meeting

Carl briefed the Council on the idea of having an all-council meeting in a central location in 2016. The Council is in favor of the idea and believes it will be good to meet together to offer support and understanding of shared and similar issues.

The Chair spoke in favor of meeting after the FSB meeting to discuss and digest the meetings actions.

Miscellaneous Presentations and Updates

Gene Peltola (OSM ARD) presented a length of service award to Chairman Enoch Shiedt Sr and provided a briefing on OSM staffing and budget.

Larry Westlake (Kiana elder) discussed salmon, bear, whitefish, and beaver observations from the area. Caribou hunting was fast and we are lucky no accidents occurred; very dangerous practices were occurring. The first caribou must be allowed to cross before hunting commences, and respectful hunting (to the resource and fellow hunters) as the elders used to instruct. No common sense is being used, and caribou migration patterns are being interrupted by hunters. Our tribal Council would like to come up with some proposals.

Henry Schaeffer (Kiana) provided observations of caribou hunting and discussed the effects of the Dalton Highway on the Northwest Arctic Herd. Population of the herd and the migration route are being negatively impacted. Would ask NWA if they would do a proposal on that...to see if they could help us to see if the sport hunters would come in after the residents in the region do their hunting.

Elizabeth Mikow (ADF&G) provided updates on research in the region by the Division of Subsistence.

Chris McKee (OSM) gave a briefing regarding the emergency sheep closure and other wildlife topics brought up by the Council.

Marcy Okada (NPS) provided updates from Gates of the Arctic National Park.

Marci Johnson (NPS) provided an overview of survey work in the Western Arctic Parklands.

Mary McBurney (NPS) discussed the Park Service proposed regulation process for the National preserve areas relating to taking of certain wildlife in preserves by sport hunters. Published Sept. 4 in the federal register. Comment period ends December 3! Public hearings this month and formal consultations will occur.

Kumi Rattenbury (NPS) provided information on surveys conducted in the region.

Tina Moran and Susan Georgette (USFWS) provided an overview of the hunting season, staffing, research and cultural activities, as well as the new proposed rule.

Ken Adkisson (NPS) provided information regarding muskox.

Jim Dau and Brandon Saito (ADF&G) provided updates and a power point presentation on the Western Arctic Caribou Herd and other wildlife resources in the region.

Confirm Dates and Locations of Future Meetings:

Oct. 6-7, 2015 Location TBD (Buckland for the meeting location was discussed, as caribou issues are getting more problematic)

Dale Stotts provided closing remarks from the Kiana tribe.

Adjourn at 5:28 P.M.

I hereby certify that, to the best of my knowledge, the forgoing minutes are accurate and complete.

Melinda Burke, Designated Federal Officer
USFWS Office of Subsistence Management

Enoch Shiedt Sr., Chairman

Northwest Arctic Subsistence Regional Advisory Council

These minutes will be formally considered by the Northwest Arctic Subsistence Regional Advisory Council at its next public meeting, and any corrections or notations will be incorporated into the minutes of that meeting.

To: Federal Subsistence Regional Advisory Councils
Date: December 2014
Subject: Scoping for Regulations to Allow *Subsistence Collections and Uses of Shed or Discarded Animal Parts & Plants from National Park System Areas in Alaska*

Issue:

The National Park Service (NPS) selected a modified Alternative D to implement its April 2014 decision regarding the environmental assessment (EA) on *Subsistence Collections and Uses of Shed or Discarded Animal Parts and Plants from Park Areas in Alaska*. The selected alternative will allow subsistence collections and uses of shed or discarded animal parts and plants to make into handicrafts for personal or family purposes, to barter, or to sell as customary trade. NPS-qualified subsistence users are residents of communities and areas with federally-recognized customary and traditional (C&T) use determinations for each species in each game management unit within the affected park areas. Subsistence users who have C&T eligibility for animal species will also be allowed to collect plant materials from those areas to make and use or sell handicrafts. The decision clears the way for the NPS to promulgate regulations to authorize such subsistence collections and resource uses on park areas in Alaska. The NPS has attempted to address concerns expressed by several Subsistence Resource Commissions (SRC) and federal Subsistence Regional Advisory Councils.

Alaska-specific regulations are needed to overcome the general nationwide NPS regulation at 36 Code of Federal Regulations (CFR) 2.1, which prohibits: “Possessing, destroying, injuring, defacing, removing, digging, or disturbing from its natural state: Living or dead wildlife and fish, or their parts or products thereof, such as antlers or nests; Plants or the parts or products thereof.” ANILCA Titles II and VIII authorize in park areas subsistence uses “of wild, renewable resources for direct or family consumption ...; for making and selling handicraft articles out of nonedible byproducts of wildlife resources taken ...; for barter ...; and for customary trade.”

The NPS indicated in a press release it would begin the process of drafting new regulations within a year of the decision. That process is underway, and we have a preliminary draft rule to available for review during the winter/spring 2015 SRC and RAC meetings. Once proposed regulations are published in the Federal Register, they are available for a 60-day public comment period. The final rule would be published after consideration of the public comments.

These regulations will provide a general framework for authorizing federally-qualified subsistence collections with provisions allowing Superintendents to customize the implementation as needed for local conditions through unit-specific regulations or compendia. NPS will continue consulting with SRCs, RACs, and tribes as the regulations and associated provisions to implement them are developed. Two-way discussions are needed to identify key concerns for the regulations and their implementing provisions such as appropriate types of written authorizations, specific local resource concerns that may need to be addressed in each

park area, and flexibility to address changing conditions in park areas regarding subsistence collections.

Discussion Points:

The EA decision specified the following:

- NPS-qualified subsistence users must have written authorization from the area Superintendent. Such authorization can take many forms. For example, individual permits could be issued to qualified subsistence users or written authorizations could be provided for specific resident zone communities or for areas with customary and traditional use findings for various resources.

Which type of written authorization would be best for your area and why?

- The decision adopted mitigating measures to minimize potential adverse effects on resources and values of affected NPS areas, including visitor use and enjoyment. Mitigating measures may include conditions and limits for collection activities, such as allowable quantities, locations, timing restrictions, or other restrictions to reduce resource impacts or user conflicts. Examples of areas that may be subject to restrictions of subsistence collections include archeological and historic sites; public facilities and travel corridors such as roads, airports and landing strips; and commonly used trails, rivers, and shores of ocean coasts and large lakes. Education programs and materials could be developed to inform the public and qualified subsistence users about the authorized collections.

Which areas and resources should be opened or not opened to subsistence collections and why?

What should be included in a public education program?

Contacts:

Bud Rice, Subsistence Manager, Alaska Regional Office, bud_rice@nps.gov, 907-644-3597

PRELIMINARY DRAFT

Section 13.420 is amended as follows:

By adding the following definitions:

Handicraft article is a finished product in which the shape and appearance of the natural material has been substantially changed by the skillful use of hands, such as sewing, carving, etching, scrimshawing, painting, or other means, which has substantially greater monetary and aesthetic value than the unaltered natural material(s). This term does not include a trophy or European mount of horns or antlers.

Wild renewable byproducts of wildlife means the nonedible antlers, horns, bones, teeth, claws, hooves, hides, fur, hair, feathers and quills, that have been:

- (1) Naturally shed,
- (2) Discarded from a lawfully hunted or trapped animal, or
- (3) Occur through natural mortality.

By revising the definition of *Subsistence uses*, subparagraphs (2) and (3) as follows:

(2) “Barter” shall mean the exchange of handicraft articles or fish or wildlife or their parts taken for subsistence uses—

- (i) For other fish or game or their parts; or
- (ii) For other food or for nonedible items other than money if the exchange is of a limited and noncommercial nature; and

(3) “Customary trade” shall be limited to the exchange of handicraft articles or furs for cash (and such other activities as may be designated for a specific park area in the applicable special regulations of this part).

Section 13.482 is added as follows:

§ 13.482 Subsistence collection and use of animal parts

(a) Local rural residents may collect wild renewable byproducts of wildlife, excluding migratory birds and marine animals, for subsistence uses in park areas where subsistence uses are allowed, provided that:

- (1) The resident has a federal customary and traditional use determination for the species collected in the game management unit where the collecting occurs (50 CFR Part 100), and
- (2) The resident has written authorization from the superintendent.

(b) The superintendent may establish conditions, limits, and other restrictions on collection activities. Areas opened to collections will be identified on a map posted on the park website and available at the park visitor center. Violating a condition, limit, or restriction is prohibited.

(c) Non-conflicting State regulations regarding the use of bear claws that are now or may later be in effect are adopted as a part of these regulations.

WILDLIFE CLOSURE REVIEW BRIEFING

As called for in the Closure Policy, the Office of Subsistence Management is reviewing existing wildlife closures to determine whether the original justifications for closure continue to apply. These reviews are being conducted in accordance with guidance found in the Federal Subsistence Board's Policy on Closures to Hunting, Trapping and Fishing on Federal Public Lands and Waters in Alaska, which was adopted in 2007. According to the policy, existing closures will be reviewed at least every three years, and are typically completed on a three-year rotational schedule. Most of the closures being reviewed this cycle were last reviewed by the Federal Subsistence Board (Board) in 2008. A summary of the current closure reviews which are applicable to your Regional Advisory Council (RAC) are provided.

Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) establishes a priority for the taking of fish and wildlife on Federal public lands and waters for non-wasteful subsistence uses over the taking of fish and wildlife for other purposes (ANILCA Section 804). The Federal Subsistence Board is authorized to restrict or close the taking of fish and wildlife by subsistence and non-subsistence users on Federal public lands and waters (ANILCA Section 804 and 815(3)) when necessary for: 1) the conservation of healthy populations of fish and wildlife; or 2) to continue subsistence users of such populations. In addition, the Board may also close Federal public lands and waters to any taking of fish and wildlife for reasons of public safety, administration, or to assure the continued viability of such population (ANILCA Section 816(b)).

Distribution and abundance of fish and wildlife populations are known to fluctuate based upon a variety of factors such as weather patterns, management actions, habitat changes, predation, harvest activities, and disease. Subsistence use patterns are also known to change over time in response to many factors including resource abundance, human population changes, among others. It is for these reasons that the Board decided in 2007 to conduct reviews every 3 years or earlier if new information becomes available that would potentially allow the closure to be lifted.

A Wildlife Closure Review contains a brief history of why a closure was implemented, along with a summary of the current resource condition and the OSM recommendation as to whether the closure should be continued or lifted.

Councils are asked to consider the OSM recommendation and share their views on the issue. Input from the Councils is critical to the development of regulatory proposals needed to address adjustments to regulations. After the Council reviews the closure review, they have three options, which should be in the form of an **action item**. They can recommend to:

- maintain the status quo
- modify
- rescind

If the Council recommends to modify or rescind, they should submit a proposal (**a separate action item**) at this time. Councils may choose to work with OSM staff to develop a proposal; however, proposals addressing these issues can be submitted by other individuals or organizations as well.

Regardless of the Council recommendation, closures remain in effect until changed by the Federal Subsistence Board, and any regulatory proposals that may result from this review process will be considered through the normal regulatory cycle. The current window for wildlife proposals for the 2016-2018 regulatory cycle closes on March 25, 2015.

**FEDERAL WILDLIFE CLOSURE REVIEW
WCR14-27**

Closure Location: Unit 23 – Cape Krusenstern National Monument (CAKR) - Muskox

Current Federal Regulation

Unit 23 - Muskox

*Unit 23 - Cape Krusenstern National Monument Aug. 1 – Mar. 15
– 1 bull by Federal registration permit (FX2303).
Annual harvest quotas and any needed closures
will be announced by the Superintendent of
Western Arctic National Parklands. Cape
Krusenstern National Monument is closed to
the taking of muskoxen, except by resident zone
community members with permanent residence
within the Monument or the immediate adjacent
Napaktuktuk Mountain area, south of latitude
67°05'N and west of longitude 162°30'W
hunting under these regulations.*

Closure Dates: Aug. 1 – Mar. 15.

Current State Regulation

Unit 23 – Muskox

Unit 23, that portion north and west of Kobuk River drainage **Residents:** *One bull by permit (TX107)* *Aug. 1 – Mar. 15*

Regulatory Year Initiated: 2005/2006

Regulatory History

Proposal WP05-19 requested the establishment of a season and allocation of muskox within the affected area. The proposal was submitted by the Cape Krusenstern Subsistence Resource Commission and the National Park Service (NPS). The intent of the proposal was to provide opportunity for families with “permanent subsistence camps” within the Cape Krusenstern National Monument (CAKR). Only resident zone community members with permanent year-round residence within CAKR or the immediately adjacent Napaktuktuk Mountain area are eligible to harvest muskox within CAKR. The Federal closure made a regulatory distinction under Section 804 of ANILCA between those with permanent residence within CAKR and the Napaktuktuk Mountain Area (south of 67°05'N. Lat. and west of 162 ° 30' W. Long.) and other resident zone community members that would normally be eligible if the affected muskox population was healthy. The proposal was adopted with modification by the Federal Subsistence Board (Board) to delegate authority to the NPS to restrict permits to permanent residents.

The Northwest Arctic Subsistence Regional Advisory Council (Council) supported maintaining the closure to non-Federally qualified users based on population concerns at its March 2011 meeting. The Council agreed to revisit the closure when further data regarding the population became available.

Closure last reviewed: 2011 – WCR10-27

Justification for Original Closure (Section 815(3) Criteria)

Section §815(3) of ANILCA states:

Nothing in this title shall be construed as – (3) authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands (other than national parks and monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in 816, to continue subsistence uses of such populations, or pursuant to other applicable law;

Because of the small allowable harvest, and the resident zone community requirements for parklands which restrict subsistence use of resources to local residents in national monuments and parks, the Board used Section 804 criteria to limit users to those with permanent residence within CAKR or the adjacent Napaktuktuk Mountain area. This criterion narrowed the eligibility for Federal permits to three families and an allocation of two Federal permits.

Council Recommendation for Original Closure

The Council recommended supporting Proposal WP05-19 with modification to provide permits only to resident zone community members with permanent residence within CAKR or immediately adjacent to the Napaktuktuk Mountain area, south of latitude 67°05'N and west of longitude 162° 30' W.

State Recommendation for Original Closure

The State supported WP05-19 as modified to provide permits to only permanent residents who lived year-round in the Monument or the immediately adjacent Napaktuktuk Mountain Area.

Biological Background

The Alaska Department of Fish and Game (ADF&G) translocated 36 muskoxen near Cape Thompson in 1970, with an additional 34 animals released in the same area in 1977 (Westing 2011). Muskox have occupied CAKR since at least 1979 and occupy habitat from the mouth of the Noatak River north to Cape Lisburn (NPS 2014). Muskox in the Cape Thompson area appear to occupy relatively discrete, “core areas” separate from the muskox population on the Seward Peninsula, although muskox are also widely scattered throughout the remainder of Unit 23 in groups of 1-4 individuals (Westing 2011).

ADF&G management objectives for muskoxen within Unit 23 (Westing 2011) include:

1. Survey the Cape Thompson population at least once every 3 years.
2. Provide for subsistence hunting and eventually a general hunting season for muskox on a sustained yield basis.
3. Provide for nonconsumptive uses of muskoxen; e.g., viewing and photography.

Additionally, the NPS has the following management objectives for muskoxen within their lands (NPS 2014):

1. Maintain a viable population of muskoxen in Cape Krusenstern National Monument and Noatak National Preserve in perpetuity.

2. Provide subsistence opportunity for harvesting muskoxen when sustainable.
3. Defer to state harvest regulations when sustainable and not in conflict with NPS regulations.

Aerial surveys in the core count area within CAKR indicate that the population had declined between the mid-2000's and early 2010's. The total population, including the core area, the Noatak River drainage and portions of Unit 26A was estimated to be approximately 500 animals (National Park Service 2014). Between 2004 and 2010, over half of the estimated total muskoxen of the Cape Thompson population were located within CAKR (**Figure 1**). Composition data collected between 2004-2014 indicate that bull:cow ratios have declined (NPS 2014). The decline in the number of mature bulls may be partially responsible for the decline in muskox populations on the Seward Peninsula and Cape Thompson areas, as well as other areas of the State (Schmidt and Gorn 2013).

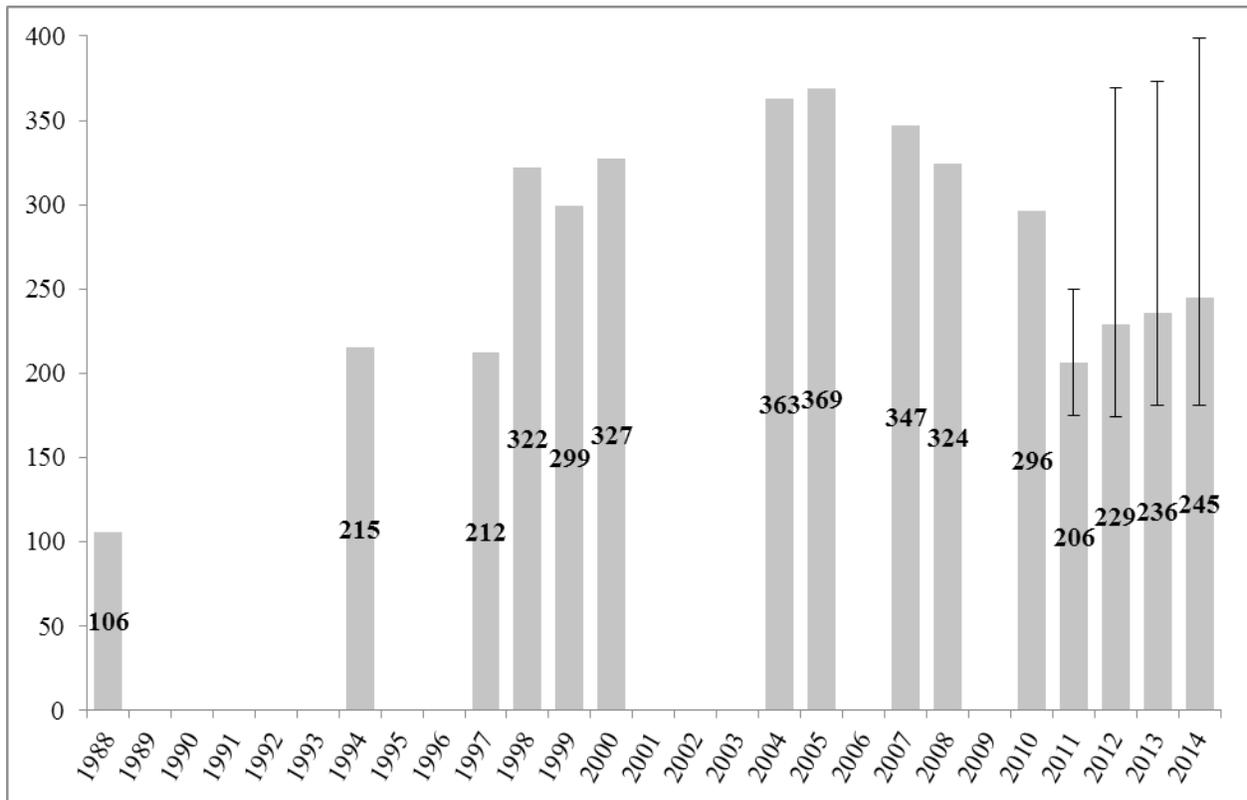


Figure 1. Number of muskoxen counted in Cape Krusenstern National Monument, 1988-2014 (National Park Service 2014). Prior to 2011, minimum count methods were used. In 2011 minimum counts were replaced with distance sampling methods and error bars represent the 95% credible intervals surrounding those estimates. Estimates for 2011-2014 are preliminary and subject to change as more detailed analyses are completed.

Harvest History

From 2005-2013, total reported Federal harvest was no more than 1 muskox per year. No harvest under the Federal hunt has been reported since 2010 (**Table 1**). Only permanent residents of CAKR or the adjacent Napaktuktuk Mountain area are eligible for the Federal hunt. Total allocation for the affected muskox population is 8 permits (6 State Tier II and 2 Federal). The average annual harvest under the State Tier II hunt was 3.8 muskox between 2005 and 2013 (**Table 1**). Illegal harvest likely occurs, but

is currently not factored into the State or Federal hunt management plans. A documented case of illegal harvest occurred in 2013 when 6 cow muskoxen were killed from the Cape Thompson population. Because of this, an emergency order was issued in June of 2013 closing the State and Federal hunts prior to the 2013-2014 season start date.

Table 1. Muskox harvest in Unit 23, Cape Krusenstern area hunts, 2005-2013 (ADF&G 2014, OSM 2014).

Year	State Tier II Hunt (TX107)	Federal Registration Hunt (FX2303)	Total Harvest
2005	0	1	1
2006	4	0	4
2007	6	1	7
2008	5	0	5
2009	4	0	4
2010	4	1	5
2011	5	0	5
2012	5	0	5
2013	2	0	2

OSM Recommendation:

- maintain status quo**
- initiate proposal to modify or eliminate the closure**
- other recommendation**

Justification

Aerial surveys of the Cape Thompson core count area over the last decade have shown a decline in the muskox population between 2004 and 2010. Additionally, declines in the ratio of mature bulls to cows over the last decade and the uncertain causes of the population decline warrant a conservative management approach within CAKR. Recent illegal harvest in the Cape Thompson area prompted the closure of the State Tier II hunt and any additional harvest within CAKR other than the 2 bull Federal quota does not appear warranted at this time. Therefore, Federal public lands should remain closed to non-Federally qualified subsistence users for the conservation of a healthy population and to allow the continuation of subsistence uses of moose (Section 815(3)). The necessity of the closure to Federal public lands in the affected area will be reassessed in three years, per the Board review process, or sooner if additional survey data suggest the closure should be lifted.

Literature Cited

ADF&G. 2014. Harvest general reports. Database accessed August 26, 2014.

NPS. 2014. Cape Krusenstern/Noatak muskoxen management recommendations and synthesis 2014.

OSM. 2014. Harvest management database. U.S. Fish and Wildlife Service, Office of Subsistence Management. Accessed on August 28, 2014.

Schmidt, J.H., and T.S. Gorn. 2013. Possible secondary population-level effects of selective harvest of adult male muskoxen. PLoS ONE 8:e67493.

Westing, C. 2011. Unit 23 muskox. Pages 48-62 in P. Harper, editor. Muskox management report of survey and inventory activities 1 July 2008-June 2010. Alaska Department of Fish and Game. Project 16.0. Juneau, AK.

We are currently excepting proposals for:
Federal Subsistence Hunting and Trapping Regulations

Ending Date: March 25, 2015

How to Prepare Your Proposal

When preparing your proposal, it is important that you include the following information:

- Name
- Organization
- Contact information (Address, Phone, Fax or Email)

Your proposal must include the following information:

1. What regulations do you wish to change? Include management unit number and species. Quote the current regulation if known. If you are proposing a new regulation, please state “new regulation.”
2. How should the new regulation read? Write the regulation the way you would like to see it written in the regulations.
3. Why should this regulation change be made?

You should also provide any additional information that you believe will help the Board in evaluating the proposed change.

How to Submit a Proposal

By mail or hand delivery:

Federal Subsistence Board
Office of Subsistence Management
Attn: Theo Matuskowitz
1011 E. Tudor Rd., MS-121
Anchorage, AK 99503

**In person at any Federal Subsistence
Regional Advisory Council meeting:**

www.doi.gov/subsistence/calendars/index.cfm

On the Web:

Go to the Federal eRulemaking Portal:
www.regulations.gov and search for FWS-R7-
SM-2014-0062, which is the docket number for
this rulemaking.

Questions? Call (800) 478-1456 or (907) 786-3888

All proposals and comments, including personal information provided, are posted on the Web at
www.regulations.gov.

ANNUAL REPORTS

Background

ANILCA established the Annual Reports as the way to bring regional subsistence uses and needs to the Secretaries' attention. The Secretaries delegated this responsibility to the Board. Section 805(c) deference includes matters brought forward in the Annual Report.

The Annual Report provides the Councils an opportunity to address the directors of each of the four Department of Interior agencies and the Department of Agriculture Forest Service in their capacity as members of the Federal Subsistence Board. The Board is required to discuss and reply to each issue in every Annual Report and to take action when within the Board's authority. In many cases, if the issue is outside of the Board's authority, the Board will provide information to the Council on how to contact personnel at the correct agency. As agency directors, the Board members have authority to implement most of the actions which would effect the changes recommended by the Councils, even those not covered in Section 805(c). The Councils are strongly encouraged to take advantage of this opportunity.

Report Content

Both Title VIII Section 805 and 50 CFR §100.11 (Subpart B of the regulations) describe what may be contained in an Annual Report from the councils to the Board. This description includes issues that are not generally addressed by the normal regulatory process:

- an identification of current and anticipated subsistence uses of fish and wildlife populations within the region;
- an evaluation of current and anticipated subsistence needs for fish and wildlife populations from the public lands within the region;
- a recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs related to the public lands; and
- recommendations concerning policies, standards, guidelines, and regulations to implement the strategy.

Please avoid filler or fluff language that does not specifically raise an issue of concern or information to the Board.

Report Clarity

In order for the Board to adequately respond to each Council's annual report, it is important for the annual report itself to state issues clearly.

- If addressing an existing Board policy, Councils should please state whether there is something unclear about the policy, if there is uncertainty about the reason for the policy, or if the Council needs information on how the policy is applied.
- Council members should discuss in detail at Council meetings the issues for the annual report and assist the Council Coordinator in understanding and stating the issues clearly.

- Council Coordinators and OSM staff should assist the Council members during the meeting in ensuring that the issue is stated clearly.

Thus, if the Councils can be clear about their issues of concern and ensure that the Council Coordinator is relaying them sufficiently, then the Board and OSM staff will endeavor to provide as concise and responsive of a reply as is possible.

Report Format

While no particular format is necessary for the Annual Reports, the report must clearly state the following for each item the Council wants the Board to address:

1. Numbering of the issues,
2. A description of each issue,
3. Whether the Council seeks Board action on the matter and, if so, what action the Council recommends, and
4. As much evidence or explanation as necessary to support the Council's request or statements relating to the item of interest.

**Department of the Interior
U. S. Fish and Wildlife Service**

Northwest Arctic Subsistence Regional Advisory Council

Charter

1. **Committee's Official Designation.** The Council's official designation is the Northwest Arctic Subsistence Regional Advisory Council (Council).
2. **Authority.** The Council is reestablished by virtue of the authority set out in the Alaska National Interest Lands Conservation Act (16 U.S.C. 3115 (1988)) Title VIII, and under the authority of the Secretary of the Interior, in furtherance of 16 U.S.C. 410hh-2. The Council is established in accordance with the provisions of the Federal Advisory Committee Act (FACA), as amended, 5 U.S.C., Appendix 2.
3. **Objectives and Scope of Activities.** The objective of the Council is to provide a forum for the residents of the region with personal knowledge of local conditions and resource requirements to have a meaningful role in the subsistence management of fish and wildlife on Federal lands and waters in the region.
4. **Description of Duties.** The Council possesses the authority to perform the following duties:
 - a. Recommend the initiation of, review, and evaluate proposals for regulations, policies, management plans, and other matters relating to subsistence uses of fish and wildlife on public lands within the region.
 - b. Provide a forum for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife on public lands within the region.
 - c. Encourage local and regional participation in the decision making process affecting the taking of fish and wildlife on the public lands within the region for subsistence uses.
 - d. Prepare an annual report to the Secretary containing the following:
 - (1) An identification of current and anticipated subsistence uses of fish and wildlife populations within the region.
 - (2) An evaluation of current and anticipated subsistence needs for fish and wildlife populations within the region.

- (3) A recommended strategy for the management of fish and wildlife populations within the region to accommodate such subsistence uses and needs.
 - (4) Recommendations concerning policies, standards, guidelines and regulations to implement the strategy.
 - e. Appoint three members to each of the Cape Krusenstern National Monument and the Kobuk Valley National Park Subsistence Resource Commissions and one member to the Gates of the Arctic National Park Subsistence Resource Commission in accordance with Section 808 of ANILCA.
 - f. Make recommendations on determinations of customary and traditional use of subsistence resources.
 - g. Make recommendations on determinations of rural status.
 - h. Provide recommendations on the establishment and membership of Federal local advisory committees.
5. **Agency or Official to Whom the Council Reports.** The Council reports to the Federal Subsistence Board Chair, who is appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture.
 6. **Support.** The U.S. Fish and Wildlife Service will provide administrative support for the activities of the Council through the Office of Subsistence Management.
 7. **Estimated Annual Operating Costs and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$140,000, including all direct and indirect expenses and 0.9 staff years.
 8. **Designated Federal Officer.** The DFO is the Subsistence Council Coordinator for the region or such other Federal employee as may be designated by the Assistant Regional Director – Subsistence, Region 7, U.S. Fish and Wildlife Service. The DFO is a full-time Federal employee appointed in accordance with Agency procedures. The DFO will:
 - Approve or call all of the advisory committee's and subcommittees' meetings,
 - Prepare and approve all meeting agendas,
 - Attend all committee and subcommittee meetings,
 - Adjourn any meeting when the DFO determines adjournment to be in the public interest, and
 - Chair meetings when directed to do so by the official to whom the advisory committee reports.

9. **Estimated Number and Frequency of Meetings.** The Council will meet 1-2 times per year, and at such times as designated by the Federal Subsistence Board Chair or the DFO.
10. **Duration.** Continuing
11. **Termination.** The Council will terminate 2 years from the date the Charter is filed, unless, prior to that date, it is renewed in accordance with the provisions of Section 14 of the FACA. The Council will not meet or take any action without a valid current charter.
12. **Membership and Designation.** The Council's membership is composed of representative members as follows:

Ten members who are knowledgeable and experienced in matters relating to subsistence uses of fish and wildlife and who are residents of the region represented by the Council. To ensure that each Council represents a diversity of interests, the Federal Subsistence Board in their nomination recommendations to the Secretary will strive to ensure that seven of the members (70 percent) represent subsistence interests within the region and three of the members (30 percent) represent commercial and sport interests within the region. The portion of membership representing commercial and sport interests must include, where possible, at least one representative from the sport community and one representative from the commercial community.

The Secretary of the Interior will appoint members based on the recommendations from the Federal Subsistence Board and with the concurrence of the Secretary of Agriculture.

Members will be appointed for 4-year terms. If no successor is appointed on or prior to the expiration of a member's term, then the incumbent member may continue to serve until the new appointment is made or 120 days past the expiration of term, whichever is sooner. A vacancy on the Council will be filled by an appointed alternate, if available, or in the same manner in which the original appointment was made. Members serve at the discretion of the Secretary.

Council members will elect a Chair, a Vice-Chair, and a Secretary for a 1-year term.

Members of the Council will serve without compensation. However, while away from their homes or regular places of business, Council and subcommittee members engaged in Council, or subcommittee business, approved by the DFO, may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under Section 5703 of Title 5 of the United States Code.

13. **Ethics Responsibilities of Members.** No Council or subcommittee member may participate in any specific party matter in which the member has a direct financial interest in a lease, license, permit, contract, claim, agreement, or related litigation with the Department.

- 14. Subcommittees.** Subject to the DFO’s approval, subcommittees may be formed for the purposes of compiling information or conducting research. However, such subcommittees must act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. The Council Chair, with the approval of the DFO, will appoint subcommittee members. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO and the availability of resources.
- 15. Recordkeeping.** Records of the Council, and formally and informally established subcommittees or other subgroups of the Council, must be handled in accordance with General Records Schedule 26, Item 2, or other approved Agency records disposition schedule. These records shall be available for public inspection and copying, subject to the Freedom of Information Act, 5 U.S.C. 552.

Secretary of the Interior

Date Signed

Date Filed

Fall 2015 Regional Advisory Council Meeting Calendar

August–November 2015

Meeting dates and locations are subject to change.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Aug. 16	Aug. 17 WINDOW OPENS	Aug. 18	Aug. 19	Aug. 20	Aug. 21	Aug. 22
Aug. 23	Aug. 24	Aug. 25	Aug. 26	Aug. 27	Aug. 28	Aug. 29
Aug. 30	Aug. 31	Sept. 1	Sept. 2	Sept. 3	Sept. 4	Sept. 5
Sept. 6	Sept. 7 HOLIDAY	Sept. 8	Sept. 9	Sept. 10	Sept. 11	Sept. 12
Sept. 13	Sept. 14	Sept. 15	Sept. 16	Sept. 17	Sept. 18	Sept. 19
Sept. 20	Sept. 21	Sept. 22	Sept. 23	Sept. 24	Sept. 25	Sept. 26
					K/A—Adak	
Sept. 27	Sept. 28	Sept. 29	Sept. 30 <i>End of Fiscal Year</i>	Oct. 1	Oct. 2	Oct. 3
Oct. 4	Oct. 5	NWA—Buckland (tent.)		Oct. 8	Oct. 9	Oct. 10
			YKD—TBA			
Oct. 11	Oct. 12	Oct. 13	Oct. 14	Oct. 15	Oct. 16	Oct. 17
		SE—Petersburg				
			SP—Nome			
Oct. 18	Oct. 19	Oct. 20	Oct. 21	Oct. 22	Oct. 23	Oct. 24
		SC - Seldovia				
Oct. 25	Oct. 26	Oct. 27	Oct. 28	Oct. 29	Oct. 30	Oct. 31
		BB - Dillingham		EI - Fairbanks		
Nov. 1	Nov. 2	Nov. 3	Nov. 4	Nov. 5	Nov. 6	Nov. 7
		WI - Kaltag			WINDOW CLOSSES	
		NS—Kaktovik (tent.)				

Subsistence Regional Advisory Council Correspondence Policy

The Federal Subsistence Board (Board) recognizes the value of the Regional Advisory Councils' role in the Federal Subsistence Management Program. The Board realizes that the Councils must interact with fish and wildlife resource agencies, organizations, and the public as part of their official duties, and that this interaction may include correspondence. Since the beginning of the Federal Subsistence Program, Regional Advisory Councils have prepared correspondence to entities other than the Board. Informally, Councils were asked to provide drafts of correspondence to the Office of Subsistence Management (OSM) for review prior to mailing. Recently, the Board was asked to clarify its position regarding Council correspondence. This policy is intended to formalize guidance from the Board to the Regional Advisory Councils in preparing correspondence.

The Board is mindful of its obligation to provide the Regional Advisory Councils with clear operating guidelines and policies, and has approved the correspondence policy set out below. The intent of the Regional Advisory Council correspondence policy is to ensure that Councils are able to correspond appropriately with other entities. In addition, the correspondence policy will assist Councils in directing their concerns to others most effectively and forestall any breach of department policy.

The Alaska National Interest Lands Conservation Act, Title VIII required the creation of Alaska's Subsistence Regional Advisory Councils to serve as advisors to the Secretary of the Interior and the Secretary of Agriculture and to provide meaningful local participation in the management of fish and wildlife resources on Federal public lands. Within the framework of Title VIII and the Federal Advisory Committee Act, Congress assigned specific powers and duties to the Regional Advisory Councils. These are also reflected in the Councils' charters. (*Reference: ANILCA Title VIII §805, §808, and §810; Implementing regulations for Title VIII, 50 CFR 100 .11 and 36 CFR 242 .11; Implementing regulations for FACA, 41 CFR Part 102-3.70 and 3.75*)

The Secretaries of Interior and Agriculture created the Federal Subsistence Board and delegated to it the responsibility for managing fish and wildlife resources on Federal public lands. The Board was also given the duty of establishing rules and procedures for the operation of the Regional Advisory Councils. The Office of Subsistence Management was established within the Federal Subsistence Management Program's lead agency, the U.S. Fish and Wildlife Service, to administer the Program. (*Reference: 36 CFR Part 242 and 50 CFR Part 100 Subparts C and D*)

Policy

1. The subject matter of Council correspondence shall be limited to matters over which the Council has authority under §805(a)(3), §808, §810 of Title VIII, Subpart B §__.11(c) of regulation, and as described in the Council charters.
2. Councils may, and are encouraged to, correspond directly with the Board. The Councils are advisors to the Board.
3. Councils are urged to also make use of the annual report process to bring matters to the

Board's attention.

4. As a general rule, Councils discuss and agree upon proposed correspondence during a public meeting. Occasionally, a Council chair may be requested to write a letter when it is not feasible to wait until a public Council meeting. In such cases, the content of the letter shall be limited to the known position of the Council as discussed in previous Council meetings.
5. Except as noted in Items 6, 7, and 8 of this policy, Councils will transmit all correspondence to the Assistant Regional Director (ARD) of OSM for review prior to mailing. This includes, but is not limited to, letters of support, resolutions, letters offering comment or recommendations, and any other correspondence to any government agency or any tribal or private organization or individual.
 - a. Recognizing that such correspondence is the result of an official Council action and may be urgent, the ARD will respond in a timely manner.
 - b. Modifications identified as necessary by the ARD will be discussed with the Council chair. Councils will make the modifications before sending out the correspondence.
6. Councils may submit written comments requested by Federal land management agencies under ANILCA §810 or requested by regional Subsistence Resource Commissions (SRC) under §808 directly to the requesting agency. Section 808 correspondence includes comments and information solicited by the SRCs and notification of appointment by the Council to an SRC.
7. Councils may submit proposed regulatory changes or written comments regarding proposed regulatory changes affecting subsistence uses within their regions to the Alaska Board of Fisheries or the Alaska Board of Game directly. A copy of any comments or proposals will be forwarded to the ARD when the original is submitted.
8. Administrative correspondence such as letters of appreciation, requests for agency reports at Council meetings, and cover letters for meeting agendas will go through the Council's regional coordinator to the appropriate OSM division chief for review.
9. Councils will submit copies of all correspondence generated by and received by them to OSM to be filed in the administrative record system.
10. Except as noted in Items 6, 7, and 8, Councils or individual Council members acting on behalf of or as representative of the Council may not, through correspondence or any other means of communication, attempt to persuade any elected or appointed political officials, any government agency, or any tribal or private organization or individual to take a particular action on an issue. This does not prohibit Council members from acting in their capacity as private citizens or through other organizations with which they are affiliated.

Approved by the Federal Subsistence Board on June 15, 2004.



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