

Kodiak/Aleutians Subsistence Regional Advisory Council

U.S. Fish and Wildlife Service
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503

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NOV 09 2016

Anthony Christianson
Interim Chair
Federal Subsistence Board
1011 E. Tudor Road
Anchorage, AK 99503

Re: Comments on the Draft Nonrural Determination Policy

Dear Chairman Christianson,

The Kodiak/Aleutians Subsistence Regional Advisory Council (Council) appreciates the opportunity to submit comments regarding the draft Nonrural Determination Policy.

The Council was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter recognize the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife on Federal public lands within the region. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region. The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Kodiak and Aleutian Islands region, including the Kodiak, Izembek, and Alaska Maritime National Wildlife Refuges.

At its recent public meeting held on August 15-16, 2016 in Unalaska the Council heard a brief presentation from Orville Lind, Native Liaison, Office of Subsistence Management, on the proposed Rural Determination Policy which outlines the administrative process for future nonrural determinations.

The Council appreciates the Board's efforts to include flexibility in this policy. However, there now appears to be no guidance on proposing a status change. There are no limits on who may propose a status change, or how often. This lack of criteria could allow for numerous frivolous or arbitrary proposals, which for obvious reasons would make communities nervous. For that reason, both Council and community members have requested that any proposal to change the status of a community come from either a member of the community or the Council itself.

We are disappointed that deference for this important issue will not be afforded to the Councils. The Council believes it is best suited to make determinations on rural status for the community it serves.

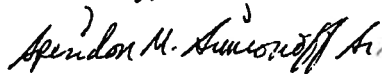
Mr. Christianson

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Finally, the Council would like to know what baseline information will be used to substantiate a “demonstrated change” in the community under *Limitation on Submission of Proposals to Change from Rural to Nonrural*. Will the “demonstrated change” to the community be based on 2007 when nonrural communities were identified, or on the current conditions of the community?

Thank you once again for the opportunity to comment. Please contact Karen Deatherage, Council Coordinator, Office of Subsistence Management, at (907) 786-3564 or karen_deatherage@fws.gov with any questions.

Sincerely,



Speridon M. Simeonoff, Sr.
Chair

cc: Kodiak/Aleutians Subsistence Regional Advisory Council
Federal Subsistence Board
Interagency Staff Committee
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Stewart Cogswell, Acting Deputy Assistant Regional Director,
Office of Subsistence Management
Amee Howard, Policy Coordinator, Office of Subsistence Management
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management
Administrative Record