



## Federal Subsistence Board

1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503 - 6199



FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

In Reply Refer To:  
OSM 23145

FEB 09 2024

Honorable Deb Haaland  
Secretary of the Interior  
U.S. Department of the Interior  
Office of the Secretary  
1849 C Street, Northwest  
Washington, DC 20240

Honorable Thomas J. Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
Office of the Secretary  
1400 Independence Avenue, Southwest  
Washington, DC 20250

Dear Secretaries Haaland and Vilsack:

The Federal Subsistence Board (Board) is writing to inform you of a request from your appointees on the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to establish uniform fair rates of compensation for the Subsistence Regional Advisory Council members while attending Council meetings.

Pursuant to Section 805 of the Alaska National Interest Lands Conservation Act (ANILCA), Subsistence Regional Advisory Councils are empowered to be a forum for the expression of opinions and recommendations about management of subsistence fish and wildlife resources in their regions. During a public meeting held in April 2023, the Council discussed the issue of Council member compensation and their need to receive a daily, uniform fair rate of compensation for the time, local and indigenous knowledge, and expertise they provide to the Federal Subsistence Management Program (Program) during their semi-annual Council meetings. The Council wrote to the Board and requested that the Board forward their letter to you because, pursuant to the Federal Advisory Committee Act (FACA), the agency head has the authority to establish uniform fair rates of compensation for comparable services of advisory

committee members. All Subsistence Regional Advisory Councils are statutory advisory committees established by the authority of ANILCA and chartered under FACA.

Council members receive no compensation for the time they spend attending Council meetings or the expertise and knowledge they provide to the Program. The cost of living in rural Alaska is very high. Council members sacrifice time away from their jobs and families to participate in Council and Board meetings and to develop recommendations on Federal fish and wildlife subsistence management on Federal public lands. These sacrifices result in loss of income and subsistence harvest opportunities. Many Councils have ongoing vacancies and are struggling to recruit applicants, not because there is a lack of interest, but because many rural Alaskans cannot afford the financial consequences of donating their time to Council meetings and the Program.

Receiving compensation while attending the Council meetings twice a year through stipends or honoraria is a common best practice. There are 10 Federal Subsistence Regional Advisory Councils, each with 10 to 13 members, totaling 109 volunteers. A daily stipend during the meeting days at a GS-12 level would cost approximately \$175,000/year. The total amount would support the essential recommendations and contributions of subsistence and commercial/sport user group representatives and traditional knowledge holders. The current Office of Subsistence Management budget could not absorb this cost; additional funding would be needed to cover Council member compensation.

Enclosed you will find a letter from the Council containing their request and justification for a review of the current Council member compensation policy. Please note a copy of the Council's letter was also enclosed in the Board's memo to Secretary Haaland as it related to Federal Subsistence Management Program Needs dated November 29, 2023.

The Board thanks you for your consideration and requests that you respond with a point of contact from your office for follow up on this important topic. If you have any questions regarding this letter, please direct them to the Office of Subsistence Management Policy Coordinator Robbin La Vine, [robbin\\_lavine@fws.gov](mailto:robbin_lavine@fws.gov), (907) 786-3353. -We look forward to hearing from you and working with you on this issue

Sincerely,



Anthony Christianson  
Chair

Attachments: R5 YKDRAC Letter to Board re Compensation  
FACA excerpt 41 CFR 102-3.130

cc: Federal Subsistence Board  
Interagency Staff Committee  
Office of Subsistence Management  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Administrative Record