

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

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In Reply Refer To:
OSM.O24014

APRIL 17 2024

To whom it may concern:

The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) would like to submit comments regarding the joint proposed rule on **Subsistence Management for Public Lands in Alaska: Federal Subsistence Board Membership (FWS-R7-SM-2024-0017-0001)**.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act (FACA). Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. 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 ten Regional Subsistence Advisory Councils (Councils) held a joint public meeting on March 5-8, 2024, in Anchorage. On the first day of the meeting, Senior Advisor for Alaskan Affairs and Strategic Priorities Raina Thiele and Department of the Interior Solicitor Robert Anderson presented and discussed the proposed rule to the Councils. Following these discussions, our Council voted to submit the following comments:

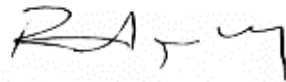
- We support the addition of three public members to the Federal Subsistence Board (Board) because it will result in a more equal balance of subsistence users and agency personnel.
- Each public member seat should represent a different region of Alaska. We are a large state with a diversity of cultures, subsistence practices, and resource management issues. Public members should represent this regional diversity and ensure that the voices and concerns of each of the various regions are brought to the Board.
- All public members on the Board should have alternates as do the agency members.
- All Tribes in Alaska should have the ability to nominate public members; it should not be

limited to only certain Tribes.

- In addition to having personal knowledge of and direct experience with subsistence uses in rural Alaska, public member nominees should also have a clearly demonstrated understanding of the Federal Subsistence Management Program, past participation in the Federal regulatory process, and, ideally, have prior experience serving on a Subsistence Regional Advisory Council. The same qualifications should apply to the Chair.
- Term limits for the Chair and public members should be five years. We suggest that after five years new nominations or nominations for re-appointment be accepted. Term limits will create periodic opportunities for new members to serve on the Board and add accountability to the membership process. With only six public member seats and 229 Federally recognized tribes in Alaska, changes in Board membership over time will allow for varying regional and Tribal representation and for new perspectives to be brought to the Board.

The Council thanks you for considering our comments on this proposed rule. If you have any questions or would like to discuss this further, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@fws.gov.

Sincerely,



Raymond Oney, Chair

cc: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Administrative Record