



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Chairman  
1011 E. Tudor Road, MS121  
Anchorage, Alaska 99503**

**In Reply Refer To:  
OSM.24058**

**May 21 2024**

Anthony Christianson, Chair  
Federal Subsistence Board  
c/o Office of Subsistence Management  
1011 East Tudor Road, Mail Stop 121  
Anchorage, Alaska 99503

Dear Chairman Christianson,

I am writing to you on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council) to request a comprehensive review of the current Subsistence Regional Advisory Council Correspondence Policy (Correspondence Policy) and action(s) to improve same.

At the All-Council Meeting in March 2024, we heard that other Councils are having similar negative experiences with the processing of correspondence. These concerns include the amount of time that it takes for a letter to go through the Office of Subsistence Management (OSM) leadership team review process and the delays experienced when the Federal Subsistence Board (Board) is asked to elevate concerns to the Secretaries of the Interior and Agriculture or express them to other agencies and organizations. Councils were also frustrated with delayed responses or the complete absence of replies from the Board or from other entities.

This Council has experienced the inadequacies of the Federal Subsistence Management Program's (Program) correspondence policies, and we have often outlined these in our Annual Reports. The Council has expressed the following concerns and recommendations, to name only a few:

- Review and approval process should be improved to provide for correspondence and replies to be completed in a reasonable amount of time.
- Levels of accountability should be identified to ensure processing is not delayed
- There should be a specific correspondence process outline developed, including listing personnel involved (to establish responsibilities) throughout the process

- There are too many levels of review required for all documents
- Reviewers were taking time to unnecessarily and substantially rewrite correspondence, resulting in letters that did not accurately reflect the Council's intent.

The Council understand that the correspondence policy was revised recently and appreciates the attempts to streamline the process; however, the execution has not yielded the level of improvement to address all of the causes for delays in processing correspondence through OSM. The Council would like the Board to request OSM to have its reviewers adhere to the new correspondence policy and meet reasonable timelines for review. And, response letters such as requests to elevate matters, drafted on behalf of the Board, should not take more than a few weeks to prepare or finalize. For example, the letter elevating the Council's Transboundary mining concerns to the Alaska Lt. Governor (submitted for processing on January 27, 2023), was not completed until February 28, 2024. The Council had included a transmittal letter with its correspondence to use for elevating this concern and we valued the Board's decision to, instead, provide a more comprehensive cover letter on the matter. However, a year passed between the submission of the request to elevate the concern and the finalization of the Board's letter to the Lt. Governor. This amount of time to process a correspondence request is unreasonable.

The Council also believes that correspondence should also be reviewed in the order in which it was received by OSM, barring any time-sensitive deadlines. We request that OSM be asked to process correspondence accordingly.

With these concerns in mind, the Council requests that the Board discuss the Correspondence Policy with OSM and make the requests included in this letter so that the business of the Council and the Program can be completed without delay. The Council further asks that a specific procedure for elevating documents to the Secretaries of Agriculture and Interior (Secretaries) be reviewed. Perhaps the Board can coordinate with the Secretaries on a better system of accountability to ensure documents are not lost and responses are promptly distributed back to the Councils. The Council also requests that the Board require OSM to implement a follow-up system where documents that have been elevated to other entities (and any responses) would be tracked.

Thank you for considering our concerns on this issue, and the Council looks forward to hearing the progress made to address them. We would appreciate an update on the steps taken to resolve these impairments to the timely processing of our correspondence on subsistence matters.

If you have any questions regarding this letter, please contact me via DeAnna Perry, Subsistence Council Coordinator, USDA – Forest Service, at [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov), or (907) 209-7817.

Sincerely,



Don Hernandez  
Chair

cc: Federal Subsistence Board  
All Subsistence Regional Advisory Councils  
Office of Subsistence Management  
Interagency Staff Committee  
Administrative Record