

Comparison of Current and Proposed Review Processes for National Park Service Individual Customary and Traditional Use Determinations

Step in process	Current Process	Proposed Process
Application window	Narrow window during call for regulatory proposals every two years	Open continuously
Application review	Proposals may be invalidated if incomplete or 13.440 permit is needed	NPS staff interview the applicant to ensure that all information regarding 8 factors is documented and process 13.440 permit application if needed
Proposal analysis	Follows standard format for C&T proposals using 8 factors. Analysis is prepared by NPS staff in combination with OSM staff	Follows standard format for C&T proposals using 8 factors. Analysis is prepared NPS staff
Advisory committee review	Federal Subsistence Regional Advisory Council	National Park Service Subsistence Resource Commission
Decisionmaker	Federal Subsistence Board	NPS Alaska Regional Director
Decision timeline	Fixed schedule -- at annual regulatory meeting	Flexible schedule -- following receipt of SRC recommendation