



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

**Michael Bangs, Chairman  
P.O. Box 1733  
Petersburg, Alaska 99833**

RAC SE16089.DP

**DEC 1 2 2016**

Mr. Anthony Christianson, Chair  
Federal Subsistence Board  
c/o U.S. Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, Mail Stop 121  
Anchorage, Alaska 99503

Re: Council comments on Draft Nonrural Policy

Dear Chairman Christianson:

The Southeast Alaska Subsistence Regional Advisory Council reviewed the Draft Nonrural Policy during its Fall 2016 meeting in Petersburg, Alaska. We appreciate the opportunity to provide feedback on the draft policy and offer the following comments for Federal Subsistence Board consideration.

The Council is generally supportive of the draft Nonrural Policy that outlines the administrative process for potential future changes to nonrural status in the Federal Subsistence Management Program and views this as a positive step forward in the Program. However, we continue to have significant concerns about how the role of Regional Advisory Councils in the nonrural determination process is portrayed in the draft policy. The Council feels strongly that the Federal Subsistence Board should extend deference to Regional Advisory Councils on issues related to nonrural and rural status in the Federal Subsistence Management Program.

As the foundational element of the subsistence priority on Federal public lands, rural status is directly linked to the take of fish and wildlife and, therefore, deference to Councils should apply according to Section 805(c) of The Alaska National Interest Lands Conservation Act. We urge the Board to specify in the Nonrural Policy that deference to Councils will be extended to matters related to the nonrural and rural status of communities and areas in Alaska.

Furthermore, we do not believe that the Draft Nonrural Policy adequately conveys the Councils' expertise and local knowledge and the importance of Council input in the decision making process associated with proposals to change nonrural status. The draft policy currently states "The Board will look to the Regional Advisory Councils for confirmation that any relevant information brought forth during the nonrural determination process accurately describes the unique characteristics of the affected regions. However, deference to the Councils does not apply." It is the opinion of the Council that this language reduces the role of Councils in the nonrural determination process to simply verifying the accuracy of information provided in proposals and/or analyses. Such an approach greatly minimizes the expertise of Councils in identifying and defining the unique qualities of each region and the subsistence way of life. We urge the Board to amend the Draft Nonrural Policy to specify that this expert local knowledge will play a clear role in the decision making process.

Any questions regarding this letter can be addressed directly to me or through our Council Coordinator, DeAnna Perry, at (907) 586-7918, [dlperry@fs.fed.us](mailto:dlperry@fs.fed.us)

Sincerely,



Michael Bangs  
Chair

cc: Federal Subsistence Board  
Southeast Alaska Subsistence Regional Advisory Council  
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  
Theo Matuskowitz, Regulations Specialist, Office of Subsistence Management  
Amee Howard, Policy Coordinator, Office of Subsistence Management  
Jennifer Hardin, Acting Fisheries Division Chief, Office of Subsistence Management  
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management  
Tim Whitford, Regional Subsistence Program Leader, U. S. Forest Service  
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