

Proposed language changes to the Draft Nonrural Determination Policy

by the Eastern Interior Alaska Subsistence RAC

The Eastern Interior Alaska Subsistence RAC voted on a motion to adopt the proposed language changes (see below) to the Draft Nonrural Determination Policy during their Fall 2016 meeting on October 25. The motion passed unanimously 9 to 0 (Motion by Umphenour, second by Glanz).

- 1) The EIRAC Fall 2015 Meeting Materials book, page 22, modify bullet point #4:
 - Consider recommendations of *Give deference to* the appropriate Subsistence Regional Advisory Council.
- 2) Page 22, last paragraph, modify last sentence:

~~However, d~~Deference to the Councils ~~does not apply~~ applies because it does indirectly affect take.

- 3) Add a new bullet point under decision making:

Public comments shall include comments made to Regional Advisory Councils, comments made at public meetings held by the Federal Subsistence Board, and written comments submitted to the Board.

Narrative statement: The Council wanted to ensure that maximum participation by the public would be matter of policy, not practice, which may be effected by staff turnover.

- 4) Page 22, modify bullet point #6:
 - ~~Engage in government-to-government consultation with affected tribes or consultation with affected ANCSA corporations.~~
 - Engage in government-to-government consultation with affected tribes.
 - Consider comments from affected ANCSA corporations.

Additionally, modify the following language in the first paragraph at page 22:

This schedule thus creates a three- year period for proposal review, analysis, Regional Advisory Council input, tribal *consultation*, and ANCSA corporation *comment consultation*, public comment, and Board deliberation and decision.

Additionally, on page 23, under General Process Timeline, make changes to reflect that consultations are with tribes only and comments are received from ANCSA corporations.

Narrative statement: The Council wants the policy to clearly provide a distinction between tribes, who should be consulted on a government-to-government basis as opposed to ANCSA corporations, whose input should only be sought because of their status as land owners.