

**Bristol Bay Subsistence Regional Advisory Council**

c/o Office of Subsistence Management

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In Reply Refer To:  
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APRIL 19 2024

To whom it may concern:

The Bristol Bay Subsistence Regional Advisory Council (Council) would like to submit comments regarding the joint proposed rule on **Subsistence Management for the Public Lands in Alaska: Federal Subsistence Board Membership (FWS-R&-2024-0017-0001)**.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Bristol Bay Region in Southwest Alaska. The Council 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. 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 Subsistence Regional 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:

- The Council supports adding three public members to the Federal Subsistence Board (Board). The Council believes the additional public members will ensure ANILCA is correctly followed.
- The Council supports having Federally recognized tribal governments nominate or recommend public members for the Board, and further supports that nominations need not be members of tribes.
- The Council wants all regions to be adequately represented by public members on the Board.
- The Council wants to ensure that all Federally recognized tribes in Alaska are adequately informed of the process if it should pass.

- The Council has concerns regarding the proposed ratification period of 10 calendar days for temporary special action requests. Special action requests often require immediate action due to conservation concerns. The Council wants to confirm that responses from the Secretaries will not have to wait 10 days for ratification in situations that are needed to protect subsistence resources.

The Council thanks you for considering our comments. If you have any questions or would like to discuss further, please contact me through our Council Coordinator Leigh Honig at [leigh\\_honig@fws.gov](mailto:leigh_honig@fws.gov), or 1-907-891-9053 or, Office of Subsistence Management at [subsistence@fws.gov](mailto:subsistence@fws.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Nanci Morris Lyon". The signature is written in a cursive style with a long horizontal line extending to the right.

Nanci Morris Lyon  
Chair

cc: Bristol Bay Subsistence Regional Advisory Council  
Administrative Record