

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
OSM.23046

MAY 11 2023

Anthony Christianson, Chair  
Federal Subsistence Board  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

Dear Mr. Christianson,

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to ask that the Federal Subsistence Board (Board) elevate to the Secretary of the Interior a request from the Council for fair Council member compensation.

The Council held a public meeting on April 4-6, 2023, in Bethel, Alaska. Among the items discussed was the issue of Council member compensation. Currently, Council members receive no compensation for the time they spend attending Council meetings or the expertise they provide to the Federal Subsistence Management Program (FSMP). The Council requests that the compensation policy for Subsistence Regional Advisory Council members be reviewed and revised.

The Federal Advisory Committee Act (FACA) states that agency heads may establish rates of compensation for Council members and that pay may be on an hourly or daily rate basis (see Enclosed). FACA also notes, "In determining an appropriate rate of basic pay for advisory committee members and staff, an agency must give consideration to the significance, scope, and technical complexity of the matters with which the advisory committee is concerned and the qualifications required for the work involved".

Twice a year Subsistence Regional Advisory Council members take time away from their families, jobs, and lives to participate in Council meetings in which they provide their expertise to the FSMP. The local and indigenous knowledge provided by Council members is fundamental to the FSMP and needed by the Board to make informed decisions about resource management issues across Alaska. Federal staff are paid for attending Council meetings, but Council members are not compensated in the same manner despite their unique qualifications. Although most Council members do not hold scientific degrees, they do hold "PhDs of the land" that have been hard-earned through lifetimes of traveling out on the lands, observing their environments, harvesting subsistence resources, and listening to the stories and knowledge of their elders and predecessors.

Currently, Council members receive per diem for the days that they travel away from their home communities to attend meetings. Council members who live within 50 miles of where the meetings take place or who must attend via teleconference do not even receive per diem due to travel policy guidelines. But per diem is not compensation; it merely provides some reimbursement for meals while traveling. The cost of living in Alaska, and especially rural Alaska, is very high. The time Council members take away from their jobs and families to participate in meetings, whether in-person or virtually, are big sacrifices that often result in losses of income. Many Subsistence Regional Advisory Councils are struggling to recruit applicants to serve on Councils. This is not because rural Alaskans do not care about subsistence issues or lack the desire to share their expertise; it is because many rural Alaskans cannot afford to take a loss by donating their time to attend meetings.

Compensation for local and indigenous knowledge holders through stipends or honoraria is a common best practice carried out in academic, non-governmental, and Tribal organization arenas. The Council respectfully asks that the Federal Government similarly value the expertise provided by Council members to the FSMP by paying a fair, daily rate of compensation to Council members when attending Council meetings or other meetings as Council representatives.

The Council would like to thank you in advance for forwarding our request for Council member compensation to the Secretary. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or [brooke\\_mcdavid@fws.gov](mailto:brooke_mcdavid@fws.gov).

Sincerely,



Raymond Oney  
Chair

Enclosure

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Members  
Office of Subsistence Management  
Interagency Staff Committee  
Administrative Record