

Eastern Interior Alaska Subsistence Regional Advisory Council

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To whom it may concern:

The Eastern Interior Alaska Subsistence Regional Advisory Council (Council) would like to submit comments regarding the joint proposed rule on **Subsistence Management for Public Lands in Alaska: Federal Subsistence Board Membership (FWS-R7-SM-2024-0017-0001)**.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Region. It 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 Regional Subsistence 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 the addition of three public members to the Federal Subsistence Board.
- All regions of Alaska should be adequately and equitably represented by public members on the Board.
- Public members should have the following qualifications:
 - be a federally qualified subsistence user
 - have firsthand experience in subsistence practices
 - hold traditional ecological knowledge tied to the region they represent
 - possess familiarity with current fish and wildlife issues in the region they represent
 - have current or previous experience serving on a Subsistence Regional Advisory Council

- demonstrate understanding of the Federal Subsistence Board, Alaska Boards of Fisheries and Game, and North Pacific Fishery Management Council regulatory processes
- Public member nominees should be evaluated using a weighted criteria that takes into account the above qualifications and the number of letters of support they receive. Additionally, an understanding of Western science should be considered. An understanding of Western science would be beneficial but should not be weighted as strongly or necessarily be a hard requirement like the other qualifications.
- Public members should have a term limit of five years after which incumbent members will need to be re-nominated and evaluated against new nominees in a process similar to Council member nominations and appointments.
- The Board Chair should also have a five-year term limit after which they should be evaluated before possibly being reappointed.
- All public members should have alternates just like agency members.
- All Tribes should have an equal opportunity to nominate public members, it should not only be limited to certain Tribes.

The Council thanks you for considering our comments. If you have any questions or would like to discuss this further, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@fws.gov.

Sincerely,



Robert "Charlie" Wright, Sr.
Chair

cc: Eastern Interior Alaska Subsistence Regional Advisory Council
Administrative Record