## Southcentral Alaska Subsistence Regional Advisory Council

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In Reply Refer To: OSM.O24021

APRIL 25 2024

To whom it may concern:

The Southcentral 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 the Southcentral Alaska 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 Subsistence Regional Advisory Councils (Councils) held a joint public meeting on March 5-6, 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.

After the conclusion of the joint public meeting, our Council held a public meeting on March 8, 2024, also in Anchorage. At this meeting, the Council voted to transmit our support of the proposed rule. The Council respectfully submits additional comments on the selection process for these additional seats for the Federal Subsistence Board (Board).

The Council is opposed to for-profit corporations nominating individuals to sit on the Board. Furthermore, the Council would also like the Regional Advisory Councils to be able to nominate members to these seats. Members of the ten Councils are already familiar with the Federal process, have knowledge of ANILCA, have demonstrated the ability to consider regional and cross regional issues, and have already been vetted during the appointment process. The Council would also like to see that both the current public seats and the proposed tribal seats be provided with their own Federal support staff, much like the Agency representatives have, so that they can

be briefed on the variety of issues and proposals that they will be acting on when the Board is in session.

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 Nissa Pilcher at (907) 891-9054 or nissa pilcher@fws.gov.

Sincerely,

Richard (Greg) Encelewski

Chair

cc: Southcentral Alaska Subsistence Regional Advisory Council Administrative Record