

**Southcentral Alaska, Kodiak/Aleutians, Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils**

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.24047

APRIL 3 2024

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

Dear Chair Christianson,

We write to you on behalf of Southcentral Alaska, Kodiak/Aleutians, Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, Northwest Arctic, Eastern Interior Alaska, and North Slope Subsistence Regional Advisory Councils (Councils) to ask that the Federal Subsistence Board (Board) elevate to the Secretaries of Agriculture and the Interior a request from the Councils for fair Council member compensation.

The ten Subsistence Regional Advisory Councils met during the All-Council Meeting March 5-8, 2024, in Anchorage Alaska. Among the items discussed was the issue of Council member compensation. Currently, Council members receive no compensation for the time they spend participating in Council meetings or the knowledge and expertise they provide to the Federal Subsistence Management Program (FSMP) during such meetings. The Councils request that a compensation policy and rates of compensation for Subsistence Regional Advisory Council members be established.

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".

At least 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 knowledge and expertise to the FSMP. Additionally, Council Chairs or their representatives attend Board meetings at least once a year and may periodically attend other Federal and State regulatory meetings or participate in other planning or advisory groups on behalf of their Councils. 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 and Board 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 and sharing 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. Per diem is not compensation; it merely provides some reimbursement for meals, incidentals, and lodging 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 the FSMP 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 Councils respectfully ask 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 regardless of how far they have to travel to such meetings.

The Councils would like to thank you in advance for forwarding our request for Council member compensation to the Secretaries and requesting they reply to the Councils. If you have questions or would like to discuss this further, please contact Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or katerina\_wessels@fws.gov.

Sincerely,



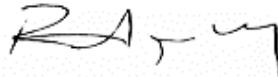
Richard Encelewski, Chair  
Southcentral Alaska  
Regional Advisory Council



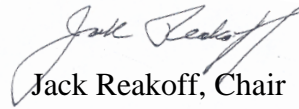
Rebecca Skinner, Chair  
Kodiak/Aleutians  
Regional Advisory Council



Nanci Morris Lyon, Chair  
Bristol Bay  
Regional Advisory Council



Raymond Oney, Chair  
Yukon-Kuskokwim Delta  
Regional Advisory Council



Jack Reakoff, Chair  
Western Interior Alaska  
Regional Advisory Council



Louis Green, Chair  
Seward Peninsula  
Regional Advisory Council



Thomas Baker, Chair  
Northwest Arctic  
Regional Advisory Council



Robert Wright Sr., Chair  
Eastern Interior Alaska  
Regional Advisory Council



Brower Frantz, Chair  
North Slope  
Regional Advisory Council

Enclosures:

1. FACA Excerpt 41 CFR 102-3.130
2. Federal Subsistence Board Letter to the Secretaries re: Council Compensation
3. Yukon-Kuskokwim Delta Council Letter to the Board re: Compensation
4. 41 CFR Subpart C

cc: Federal Subsistence Board  
Southcentral Alaska Regional Advisory Council  
Kodiak/Aleutians Regional Advisory Council  
Bristol Bay Regional Advisory Council  
Yukon-Kuskokwim Delta Regional Advisory Council  
Western Interior Alaska Regional Advisory Council  
Seward Peninsula Regional Advisory Council  
Northwest Arctic Regional Advisory Council  
Eastern Interior Alaska Regional Advisory Council  
North Slope Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Administrative Record