

Southcentral Alaska Subsistence Regional Advisory Council

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April 08 2026

Don Striker
Regional Director (Acting)
Alaska Regional Office
National Park Service
240 West 5th Ave.
Anchorage, Alaska 99501

Dear Regional Director Striker,

The Southcentral Alaska Subsistence Regional Advisory Council (Council) appreciates the opportunity to provide comments on the National Park Services (NPS) Proposed Rule Regulation identifier number 1024-AE96 (Proposed Rule) that was published on March 10, 2026. The Council held a public meeting in Anchorage on March 17, 2026, during which members received a briefing on the Proposed Rule. The Council respectfully submits the following comments for consideration on this topic. The Council also requests an extension of the public comment period.

The notice for the Federal Register came out shortly before the Council's meeting, and Council members were not provided with copies of the notice prior to the meeting, and only a few copies of the Federal Register were available in hard copy at our meeting. Additionally, this topic was only added to the Council's agenda on the morning of the meeting when we confirmed that the NPS was available to speak on the Proposed Rule. This issue is substantial and will greatly affect subsistence users and cannot be adequately evaluated without sufficient background time and materials. As a result, the Council was unable to thoroughly discuss or assess the implications of the proposal.

There are seven NPS Subsistence Resource Commissions (SRC) in Alaska. SRCs were established in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are a key element of NPS subsistence management. They are there to provide a direct link between subsistence users, park superintendents and subsistence managers, and to provide local knowledge and perspectives on regulatory proposals, policies, and management plans for each new park and monument created by ANILCA. Yet only one of these SRCs even met in the time frame to allow them to comment on this Proposed Rule, despite it being released during the winter meeting window.

There are ten Subsistence Regional Advisory Councils (RACs) in Alaska, of which this Council is one. The RACs were also established in Title VIII 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. Only four of the RACs met in the time frame to allow them to comment on this proposed rule, also despite it being released during the RACs winter meeting window.

The Council strongly recommends and requests an extension of the comment deadline, along with detailed briefings from the National Park Service on how the proposed regulations would specifically affect subsistence uses presented to the SRCs and the RACs. While the Council appreciates the efforts of NPS employees to assist the Council in understanding the changes that the Proposed Rule would enact, the Council feels that in order to make informed comments on this subject, more information is needed from NPS and more time needs to be afforded to the RACs and SRCs for them to make informed and substantive comments and recommendations.

The Council was notified that the Proposed Rule will undergo the NEPA process. After this, the Council requests that all RACs and SRCs receive a comprehensive report from NPS and have a chance to provide further comments. RAC meetings are scheduled up to eighteen months in advance. The Council is unaware of the current SRC schedule, but they typically meet prior to the RAC fall and winter meetings, so the SRC recommendations are available to the RAC for their deliberations. Additionally, NPS should be very aware of when their SRCs are meeting to ensure that the SRCs can hear the results of the NEPA process and comment.

The proposed rule states on page 11,488: "This proposed rule more closely aligns harvest regulations in national preserves in Alaska with State of Alaska regulations, ensuring that hunting opportunities on preserve lands are consistent with similar opportunities on State, private, and other Federal lands as they were before the 2015 Rule." While the Council supports alignment with State regulations in some instances when appropriate, there are many circumstances where this simply will not work. The State system does not and cannot provide a rural priority, and there are times, places, and species where this priority is a necessity.

The Council is part of the Federal Subsistence Management Program, and our decisions are guided by—and committed to upholding—Title VIII of ANILCA. The National Park Service's rulemaking should also reflect the same focus and responsibility.

With limited information that the Council was provided at the March 2026 meeting, and the very limited time the Council had to review the information, the Council must view the Proposed Rule overall as detrimental to subsistence users and therefore cannot support it. The Proposed Rule would increase competition for already diminishing resources. Similar requests for State management have recently come from the State of Alaska and Safari Club International. At a recent public hearing in Anchorage on the Federal Subsistence Management Program Review, a large percentage of participants opposed changes that would shift the Federal program toward the State system. This proposed rule appears to follow that direction, and the Council is in strong opposition to it.

Findings in Section 801 of ANILCA affirms that:

- (1) the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and non-Natives, on the public lands and by Alaska Natives on Native lands is essential to Native physical, economic, traditional, and cultural existence and to non-Native physical, economic, traditional, and social existence;
- (2) the situation in Alaska is unique in that, in most cases, no practical alternative means are available to replace the food supplies and other items gathered from fish and wildlife which supply rural residents dependent on subsistence uses;
- (3) continuation of the opportunity for subsistence uses of resources on public and other lands in Alaska is threatened by the increasing population of Alaska, with resultant pressure on subsistence resources, by sudden decline in the populations of some wildlife species which are crucial subsistence resources, by increased accessibility of remote areas containing subsistence resources, and by taking of fish and wildlife in a manner inconsistent with recognized principles of fish and wildlife management;

The Council, in all its decisions, takes into account these key findings. If the Proposed Rule were to be made final, there is a real threat to the continuation of subsistence for rural Alaskan residents due to the threat of increased use of finite resources.

Thank you for considering our comments. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Richard [Greg] Encelewski
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Southcentral Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record