

Federal Subsistence Board – Regional Advisory Councils and External Communication Procedures Policy

1. PURPOSE

1 (a) Goal

The purpose of this policy is to establish standardized, reliable, and legally compliant procedures for how the Federal Subsistence Board (Board) reviews, processes, and responds to official written communication from the Regional Advisory Councils (Councils) and external entities.

1 (b) Authority

The Board operates under the delegated authority of the Secretaries of the Interior and Agriculture (Secretaries) to implement Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA). Under this mandate, the Board regulates the taking of fish and wildlife for subsistence uses on Federal public lands, upholding the subsistence priority provided by Title VIII. ANILCA Section 805 authorizes the Councils to submit annual reports to the Secretaries and requires the Board to consider these reports.

Additionally, under 43 CFR 51.10(d), the Board is legally authorized to review and respond to matters related to the subsistence taking and uses of fish and wildlife. This includes the authority to notify or make formal recommendations to the Secretaries regarding activities outside of the Board's jurisdiction that impact federal subsistence uses and priorities.

2. SCOPE AND APPLICATION

2 (a) Target Group

This policy applies to all formal written communications directed to the Board, primarily focusing on correspondence, requests, and annual reports submitted by the Councils.

2 (b) Exclusions

This policy explicitly excludes the following communication pathways from its standard operating procedures:

- **Public Inquiries:** General inquiries from the public are not handled directly by the Board and must be routed through OSM.
- **Tribal and ANCSA Corporation Communications:** Official communications from federally recognized tribes and Alaska Native Regional or Village Corporations (ANCSA Corporations) are excluded from these guidelines and are handled strictly under the dedicated Board Tribal Consultation Policy.
- **Regulatory matters:** proposals, reviews of existing closures, special actions, and requests for reconsideration are governed by separate policies and regulations

3. POLICY STATEMENT

3 (a) Core Mandate

The Board shall formally respond directly to all written communications that fall within its established regulatory authority under ANILCA Title VIII. For critical matters outside its direct authority, the Board may elevate the issues exclusively to the Secretaries.

3 (b) Standards: Letters & Annual Reports

- **Matters Within Board Authority:** Draft responses must be vetted through the Interagency Staff Committee (ISC) and finalized by Board approval via email or during a formal public meeting.
- **Matters Outside of Board Authority:** For issues outside its authority, the Board must choose one of three actions:
 - endorse and forward the correspondence to the Secretaries
 - transmit it without endorsement, or
 - decline to elevate it.

The final chosen action must be communicated back to the originator of the letter.

- **Council Annual Reports:** In compliance with ANILCA Section 805, the Board will treat annual reports as vital informational tools that provide the Board with updates, insights, and evaluations of current and anticipated subsistence uses and needs in each region. The Board will review and discuss these reports face-to-face with Council Chairs during an annual public work session and identify priority items for elevation to the Secretaries.

Responses to, or action on, specific issues will be documented during the work session. Staff will summarize the Board's discussion and direction on the annual reports to include in Council's fall meeting materials.