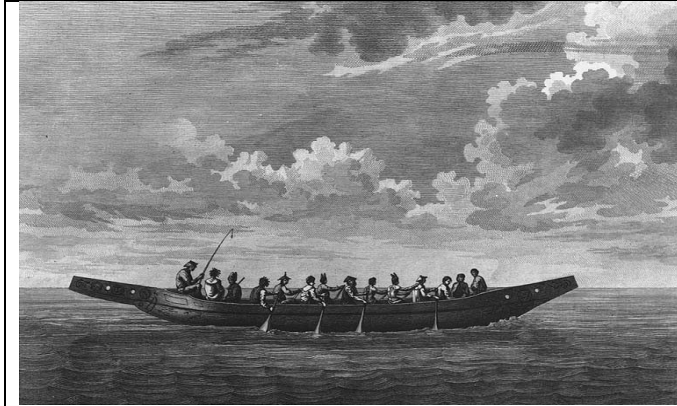




***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
c/o Office of Subsistence Management
1011 E. Tudor Rd., MS 121
Anchorage, AK 99503-6199**

RAC/SE 20033.DP

DEC 4 2020

U.S. Fish and Wildlife Service
Office of Subsistence Management
Federal Subsistence Board
1011 East Tudor Road, Mail Stop 121
Anchorage, Alaska 99503

RE: SE RAC's AUTHORIZATION FOR CHAIR TO PROVIDE RESPONSES

To the Federal Subsistence Board and Office of Subsistence Management:

The Southeast Alaska Subsistence Regional Advisory Council (Council) met for its fall meeting October 20-22, 2020. The Council discussed numerous projects that are currently pending in the Southeast that may affect subsistence uses of fish and wildlife resources. The Council noted that two public comment periods on these projects expired in the days just prior to the Council's meeting.

The Council has recognized its inability to fully participate in the National Environmental Protections Act (NEPA) process for proposed projects, especially over the last two years. The timing of public comment periods rarely coincide with either of the Council's bi-annual meetings. This Council has asked for extensions in the past to provide public comment as a Federal Advisory Council Act (FACA) committee; however, to date, no extensions have ever been granted.

In the Alaska National Interest Lands Conservation Act (ANILCA), Congress recognized that subsistence regional advisory councils have specialized knowledge about subsistence uses in their respective regions and should have a meaningful role in providing input on any significant restrictions to these uses. For several years, the Council has reviewed numerous resource management actions and received substantial and relevant testimony from the public on how proposed actions may impact subsistence resources critical to those users. To share this

information through formal comments, the Council is required to have a discussion and vote on the record about the action they wish to take. As mentioned above, many deadlines occur outside the dates of Council meetings and thus, prohibits the Council from making timely comments and recommendations.

To address this deficiency, this Council voted to authorize the Chair of the Council to provide comments on the Council's behalf when NEPA actions require a response outside of the timeframe when the Council can meet and supply specific comments on the record. This Council has discussed various proposed alterations to Federal public lands and waters in Southeast Alaska in past years. Most recently, the Council built a record that resulted in a 26-page letter on the potential effects of the Alaska Roadless Rule, which provided comprehensive observations and traditional ecological knowledge. With this, and the historical record built over the last twenty-plus years, the Council is confident that the Chair, with the Council coordinator's assistance, can develop and deliver meaningful comments when necessary.

This letter is being sent to advise the Office of Subsistence Management and the Federal Subsistence Board of the Council's desire to participate in the important public processes provided by NEPA. The Council has full trust in its Chair to represent the Council for this purpose and has initiated this strategy to timely meet its obligations and responsibilities granted in ANILCA.

If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-209-7817, deanna.perry@usda.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donald Hernandez", with a stylized, flowing script.

Donald Hernandez
Chair

cc: Southeast Alaska Subsistence Regional Advisory Council Members
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
Lisa Maas, Acting Subsistence Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Tom Kron, Acting Supervisory Program Analyst, Office of Subsistence Management
Michael Ielmini, Acting Regional Subsistence Program Leader, U.S. Forest Service
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record