

## **ANNUAL REPORT REPLY PROCESS REVIEW**

During the Federal Subsistence Board's (Board) August 2021 work session, the Interagency Staff Committee (ISC) briefed the Board on the annual report reply process and possible revisions to improve response to Regional Advisory Council (Council) concerns. The Board reviewed and discussed the annual report reply process and agreed to add this topic to the Councils Fall meeting agendas for Council input on suggested revisions.

ANILCA, Section 805 authorizes the Councils to prepare an annual report containing information related to current and future subsistence uses of fish and wildlife populations, an evaluation of current and future subsistence needs for these populations, a strategy for their management, and recommendations related to policies, standards, guidelines, and regulations to implement the strategy. These reports are invaluable as they provide the Board with a broad, holistic picture of local resource conditions, and the needs and challenges facing communities across rural Alaska. With this knowledge, the Board can make more informed decisions.

Historically, the Federal Subsistence Management Program has strived to provide responses to every topic listed in annual reports, regardless of the Board's ability to address the issues raised. While all topics are important to Board understanding of local conditions, many are on issues over which the Board has no regulatory authority, and some of the same or similar topics are often repeated in subsequent years with no resolution. ANILCA does not require replies to annual reports from the Councils and currently the Code of Federal Regulations state that the Board "consider the reports and recommendations of the Regional Councils." For these and other reasons, it is unclear if Board responses on all annual report topics are helpful to the Councils and warrant the use of often very limited staff capacity.

One way to address Council reports and recommendations would be to change the process of how the Board responds to Council issues. Process revisions could include that Councils consider letter writing as the most appropriate means for requesting a response to topics of concern, and that the annual report process be streamlined as a mechanism for informing the Board of local conditions and needs. This revision would allow for more substantive and timely responses from the Board on topics most critical to the Councils. Under this scenario, Councils could ask their Coordinators to write a letter to the Board if there are annual report topics to which they are specifically requesting a response. Any other topics, such as those outside the regulatory authority of the Board, can be addressed to the appropriate Federal agency staff at Council meetings, or Councils can write letters requesting a response directly from them, thus streamlining the response process and encouraging direct agency communications with the Councils.

These suggested revisions are not intended to diminish the ability of the Councils to report to the Board on topics of concern, and Councils will still receive responses when requested from the Board. At this time, the Board is seeking input from the Councils on these suggested changes to the annual report process. Council feedback on this issue is critical as the Board evaluates how to make the reply process more efficient and responsive. The Board will consider Council input on the annual report reply process at its winter work session at the end of January 2022.