

LAKE CLARK NATIONAL PARK  
SUBSISTENCE RESOURCE COMMISSION  
Port Alsworth, AK

**SRC Minutes - Certified by Chair Warren Hill on 3/26/26**  
**Saturday, February 7, 2026**  
**Meeting held via teleconference**

**Call to order: 1:02 p.m.**

**Present**

SRC Members: Steve Kahn, Tinny Hedlund, Warren Hill, Karla Jensen, Ned Fowler

Absent: Tim Anelon

NPS: Grant Hilderbrand (Superintendent), Liza Rupp (Subsistence Program Manager); Eva Patton (NPS Regional Subsistence)

Guests: Sarah Taylor (Policy Advisor, Office of the Secretary of the Interior, Alaska Affairs)

**Roll Call**

The roll call confirmed that five Commissioners were present, and one Commissioner had an excused absence. A quorum was met.

**Introductions**

SRC (Subsistence Resource Commission) members and all those in attendance introduced themselves.

**Commission member reports**

Warren Hill: As everybody knows, it's been pretty much a fantastic winter, other than at times a little bit too much winter. There was a really long cold snap, which was fun for the first, like, two weeks, but after four or five it was getting a little long. But it's been great. It means that we've got a lot of lake ice, and people have been able to travel a lot, and I know there's quite a bit of trapping activity around Lake Clark, and people are being successful. I saw some fresh wolf tracks this morning on my property. It looks like multiple animals. So, it's nice to have a real winter for once.

Ned Fowler: I would share a lot of the same. It was really cold for a while, but now that it's warmed up, it's been awesome with some awesome winter conditions, and I've been really enjoying getting out to enjoy a more, what used to be normal winter around Port Alsworth.

Karla Jensen: Over in Pedro Bay, we had a really cold snap there for a while, and finally froze this lake. Maybe 10 days ago we measured 16 inches of ice, and then in the last few days we had rain and it warmed up, and so now we're bare ground again and lots of water.

Steve Kahn: Nothing to report, just a little warmer here in Homer.

Tinny Hedlund: It's nice and sunny and warm in Arizona.

### **Secretarial Review of the Federal Subsistence Program: Sarah Taylor**

Thank you for all your hard work in preparing for these meetings and helping us with our management work. We're here because on December 15th, the Secretary of the Interior and the Secretary of Agriculture announced the initiation of a review of the Federal Subsistence Management Program, and that is specifically to ensure that it is best serving rural Alaskans and prioritizing subsistence uses to fish and wildlife on federal public lands and waters. So, the review is really focused on how the program is meeting the purposes and provisions of ANILCA and how it meets and incorporates the needs of the users on the ground, especially as it was envisioned when the program was created in the early 90s.

This review is a kind of a tradition at this point. After the McDowell decision, when the Federal Subsistence Management Program was created by group effort mostly, the first review occurred about 14 years later, in 2009-2010, we did a comprehensive review of the program, and that was also run through my office, which is the Alaska Affairs Office. And our office led that review, and from that review, several changes were made to the program, probably the most visible one being we were able to add two public members to the Federal Subsistence Board.

We had a review recently that was very specifically targeted at the conversation with Alaska Native people, and that was in 2022-2023. We were able to add an additional three seats to the board, and those seats are nominated by tribes.

So, we've had some big changes that came from these reviews, and that's not necessarily what we're looking to do is make big changes, but we want to really have this tradition of accountability and make sure that we're adapting. And starting with that review in 2009 and what we learned in our conversations and consultations and listening sessions in 2022 and 2023 and then continuing that conversation with the public, we had a public meeting this week on Tuesday, and it went into the night, but it was an incredibly rich and passionate and powerful conversation between a lot of user groups with a lot of different opinions, and so we can see that, and we want to be able to capture as many voices as we can in this process. As with the 2009 review, our office is going to be leading it. The secretaries are focused on engagement in

Alaska, so we're really hoping for comments and suggestions from Alaskans, especially subsistence users, and our focus is primarily on seven topics.

One of those topics is that we recently removed the Office of Subsistence Management (OSM) out of the Fish and Wildlife Service, where it had been put for a lot of reasons, but we had received many complaints about that. So it was moved by legislation. Congress told us to move it into the Office of the Secretary, and we did that. We completed that just about two years ago. So the Office of Substance Management is now located in the Office of the Secretary, and it's under a specific assistant secretary, and I'm happy to answer any questions you have about that, but really it's a very administrative process, so it's kind of how close the office is to the secretary, how many layers are in between what they do and the secretary's guidance. We're looking for any feedback people have on the first two years of OSM being under the Office of the Secretary.

So we're also looking at criteria for membership. We've received a lot of correspondence on this topic. In 2025, we received seven or eight letters all about some of these issues and the criteria for regional council, regional advisory council membership, membership on the Federal Substance Board. We were receiving a lot of correspondence about that. We'd really like to say, you know, what are the needs? Is there a need? What should we be looking at changing, if anything?

We're also looking at dual management, so how federal regulations and state regulations work together. I know that's something that the SRC has a lot of really unique experience with, and also how the participation of the state of Alaska in the Federal Substance Management Program is working. Is it working? Do you see the role that the state plays in the program to be adequate? Should it be different, or should it be less involved? We're looking for any kind of feedback that you can see as users on the ground. As regulators, it's very difficult for us to understand where the problems are, and we want to know how we can fix them if there are problems out there.

Two other things we're looking at are kind of more internal procedures for the program.

One of that is regulations governing special actions. I'm not sure how familiar you are with special actions, those are kind of mid-cycle, or, can't wait for the full fishery cycle or the full wildlife cycle. A decision needs to be made very quickly on a temporary basis or on an emergency basis. We have regulations for that and we want to make sure that that process is working for people and that it's working for the resources.

Another one of our internal procedures is for how we make non-rural determinations. We have make sure we know what to do when a community transitions from being urban to being rural or from being rural to being urban. And that's a conversation we've been having since ANILCA passed, and it's a conversation we're still having. We used a certain set of criteria in recently determining that Ketchikan was rural and that the people there qualify as federally qualified subsistence users. We're interested in feedback on those procedures, making sure that they're

adequate, making sure that they're capturing the intent of ANILCA and that they're meeting subsistence needs and making sure that we're prioritizing subsistence uses.

So that is the long version of what we're looking at here in the review. Title VIII of ANILCA provides a lot of mechanisms for prioritizing subsistence uses. We're making sure that after three decades, we're getting it right. And these are based on a lot of stakeholder concerns that have been raised, but we really want to make sure that the conversation here in this scoping process, which is what we're in now, just the scoping process, we want to make sure that we're getting as much feedback as we can on these issues and not just listening to people who've written us letters. But we're getting more feedback, and that's why I'm here today, and that's why I'm here to answer any questions you might have.

I want to let you know that the deadline for public comment is February 13th, which is Friday. But for the Regional Advisory Councils and the SRCs, because you advise the Secretary, you can submit your letter to the Federal Subsistence Board, who will get it to our office, and you can do that any time. And we won't make the SRCs and the RACs comply with the public deadline because you guys are definitely different than public. So please know if you need time to draft this letter, we can accommodate that for you. I know that a lot of work goes into providing feedback and making sure that it meets the consensus of the group. We are willing to give as much time as we can to allow you to have the amount of input that you want.

Thank you very much for your time today, and I'm here for any questions. I'll be here at the rest of the meeting.

Warren Hill: Thanks, Sarah. That's great to know there's no deadline. I think we were under the impression that there was.

So, I was curious, so based on whatever information and opinions we share with you that then gets passed on to the Federal Subsistence Board, they'll be the ones who may or may not make changes, is that correct?

Sarah Taylor: Well, the Secretaries are looking to make the changes. They would make the changes to the program, or they would propose changes. What will happen after the scoping process, after we get feedback from the public and after we get input from the RACs and the SRCs, and when I say you send the letter to the Federal Subsistence Board, I just mean that as part of the regular correspondence policy, which is that your chair will send it to the Federal Subsistence Board and they just pass it to our office. We're going to have an interagency working group that's going to get together, look at all the feedback that we received during the scoping process, and then make a report with recommendations to the Secretary. We're looking at early summer for the report. The Secretaries will look at the report and they'll decide if anything looks like it needs to be fixed or it needs to be adjusted and how best to accomplish that. And then something will be proposed either in regulation or in policy. I would say that would happen no earlier than later this year.

Steve Kahn: I have a couple of questions for you. First, thank you for being here on the call. I really appreciate that. How long have you been in your position in Anchorage itself, at your office?

Sarah Taylor: I've been here eight years. My position title is Congressional Affairs and Policy Advisor.

Steve Kahn: The other thing is, we were provided with the petition for revisions to the FSB regulations from the Safari Club International, and it's quite extensive. It really goes into everything. So how much are you or the secretaries following or taking all the changes that they're recommending into consideration as you're looking at the seven specific things that you're asking for input on?

Sarah Taylor: Well, I can tell you something true, which is that I helped to draft the proposed review. I helped draft those topics and I helped draft the process, and the Federal Register Notice, and I did all of that without reading the SCI petition. So that's how much it actually influenced the, what you could say, the origins of this review, which is to say it didn't. It didn't influence the origins of this review. These topics in this process were organically derived from the fact that when we received the petition from SCI, we received a lot of letters from other groups that followed right after that. Those were all consistent with letters that we had been receiving at the secretary's office for years, so it was like these were perennial issues. Some of these issues were recent, like the move from OSM, but that was in legislation. We'd like to know did we execute that legislation correctly? It seemed like we should ask that question if we're going to be doing a comprehensive review of the program.

So I can tell you that, and I can tell you that I know that's true. In terms of how else it influenced other people in crafting this process, I don't know.

Steve Kahn: Thank you. Appreciate it.

Warren Hill: So question for the group, do we want to just go down this list of questions and kind of I can read them out one by one, and then we can go around the table and just kind of brainstorm people's comments? I think from that we'll get a body of ideas that we can then use to draft our suggested letter. Is that kind of how we think this is going to work?

Liza Rupp: That sounds good to me.

Steve Kahn: That sounds good to me.

Karla Jensen: Sounds good to me, too.

Ned Fowler: Sounds good.

Warren Hill: Very well. I'll start with topic number one with the handout that was provided by Liza, which is the Interior Department move of the Office of Subsistence Management to the Office of the Assistant Secretary for Policy Management and Budget.

I, for one, honestly, I guess I'm sure I did know that happened, but I can't say I noticed any negative or positive effects from it myself. So I guess I don't really have a strong opinion about this one either way. And I don't really want to see any further changes, which could then create confusion and disruption. I guess I say we should just leave it as it is. Anybody else have any thoughts?

Steve Kahn: I would be curious if Liza or Eva, have you witnessed any changes in that time period. Does anything run smoother or doesn't run as smooth? Like Warren said, we're not witnessing a lot of that. The one thing I do know is that Secretary of the Interior appointees take a long time to get approved. I don't know if that's something within this switch of offices or jurisdictions that would be addressed with that. Eva or Liza, have you seen any changes?

Eva Patton: serve on the ISC, the Interagency Staff Committee, which is made up of all the federal management agencies, representatives from each of the federal land management agencies. We meet regularly with OSM's staff. We meet once a month, and we also meet regularly to both draft and review all of the wildlife and fisheries proposal analyses, special action requests. We also serve as staff to our regional director, who sits on the federal subsistence board. So we work very closely with OSM and all of their staff at each stage of the process in the federal subsistence regulatory cycle. And I can say from our experience as one of the federal land management agencies that make up part of the federal subsistence management program that OSM has done a phenomenal job in that transition. And they were supported in that transition.

They used to be housed under Fish and Wildlife Service, and they were supported in that transition by Fish and Wildlife Service to the assistant secretary's office. Crystal Leonetti is the current director of the Office of Subsistence Management, and her boss now is directly within the assistant secretary's office. So there has been some turnover because it's an appointment process at the secretary's level. But I know that OSM has worked diligently, all of their staff, to make that transition happen, and that transition happen as smoothly as possible. From our experience, there has been little, if any, delay or interruption in the federal subsistence management program process.

Steve Kahn: Well, that's great. Thank you, Eva.

Warren Hill: Thanks, Eva. Anybody else on the board have any thoughts? If nobody else has anything they really want to input, it sounds like we're fine with it the way it is. And based on what Eva said, I think we should just leave it as it is.

Steve Kahn: I agree.

Tinny Hedlund: I agree.

Karla Jensen: I agree.

Ned Fowler: I agree.

Warren Hill: Okay. Question number two, criteria for regional advisory council membership, which right now is pretty loose as I see it. Like we just spread the word and try to find people that are interested in doing it, which is actually rather difficult. I can't remember exactly what this was getting at, but basically you have to be a resident of the area in one of the resident zone communities. And there's no real official recruitment program or appointment program. It's just kind of word of mouth.

And then we try to fit people into the various seats that we have, including the appointment by the Secretary of the Interior and the State of Alaska Governor appointees, and village and tribal appointees. I don't see any need to change the percentage of makeup of the councils. I know there's discussion about trying to get more commercial involvement versus just subsistence users. When we look at our group here, three out of five of us being Tinny and Ned and Steve formerly were commercial guide types or are. We already have a pretty heavy commercial influence amongst ourselves. But also, everybody is also subsistence users, which I think is great. So I guess what I'm getting at is I don't really want to see any changes. I think if there was some sort of forced percentage or ratio, I think it would be even more difficult to recruit folks. And I could see potential for some domination by one sort of user group or the other, like our area is primarily the subsistence users versus commercial users. I like that we have the freedom to have that if that is, you know, what our general makeup is, if that makes sense. Anybody else have any thoughts?

Ned Fowler: I think it is a good makeup how it is kind of open. What I would say is maybe if there was more information out there when we are looking for board members, but that's not really the program's fault. Maybe it's more that a local community or local communities have more information when these appointments are coming up. But I think it is a good mixture of different user types we have on our local SRC.

Steve Kahn: I agree with both Ned and Warren on this. I think just we should maintain the way it's been. It's been working really well, except for more outreach and word out to try to recruit more people. That would be great.

Warren Hill: I think when we do put out public notifications for these things, it sounds very bureaucratic, and that's not why I signed up. I enjoy the information sharing and learning about the resource. Maybe we could get a little more creative in our bulletins and stuff and try to make it sound a little more fun.

Anybody else? It sounds like nobody really has any other opinions. We like it the way it is.

Tinny Hedlund: Sounds good to me.

Steve Kahn: Sounds good.

Karla Jensen: I think we should leave it as it is.

Warren Hill: Great. Okay. I think we'll move on to number three, membership of the Federal Subsistence Board. I can't remember what all the exact numbers are, but it currently is made up of both representatives from the federal agencies that are involved with federal subsistence, and also public seats. It's a nice mix. And I think now there's tribal seats too. Is that correct, Eva? Can you break that down again for us?

Eva Patton: The three public member seats and the public member chair have been in place since the previous secretarial review. They were added to provide a rural subsistence user representation on the Federal Subsistence Board. And then just this past year under the previous administration, Secretary Haaland added an additional three public member seats to the Federal Subsistence Board that were tribally nominated to serve in that role. So now there are six public member seats and five federal agencies on the board. And that's in regulation. Each of those recommendations to add seats went through a regulatory change. So that would be another regulatory change to modify the current makeup. But Sarah could probably provide a little more detail for you there as well in terms of the process.

Sarah Taylor: Secretary Haaland implemented the change to add tribally nominated seats. This is something we heard requested through listening sessions and tribal consultations and a number of letters that we received. And exactly as Eva said, it has to be done by regulation.

The board originally started as one chairman who had to be knowledgeable about subsistence, plus the heads of the land managers so BIA, BLM, Park Service, Fish and Wildlife Service, and U.S. Forest Service. That was the original board.

After the 2009 review, people said you need more expertise because the land managers are constantly changing. So, the two public seats were added, I believe under Secretary Jewell. Then as time went on, it became clear that that ratio was still not effective, according to a lot of people that we talked to. Then we added the three seats that are nominated by tribes. They do not have to be tribal members, but they are nominated by tribes. So, for example, one of the nominees that was appointed to the board was Frank Woods from Dillingham, from your region.

To recruit, we put out a Dear Tribal Leader letter, and we put out a lot of postings around communities to get your tribe to nominate a person to the board. Over the course of about four months, we received about 13 nominations. We put together a package of those nominees for the Secretaries to choose from. They selected the three that were appointed and they're appointed for three years. If you have any feedback on how we did that recruitment for the Federal Subsistence Board, we'd be open to that because it was kind of something we made up. We're interested in making sure that it's something people can really come to depend on.

Warren Hill: Sounds like you had good success, Sarah, with 13 or 14 nominations there. That's great.

Well, my personal opinion is that I think having a larger board or more seats on the board is better. Like more opinions from varying areas, different backgrounds, each having equal

authority and weight on the actual Federal Subsistence Board, I think is great. And I wouldn't want to see that change other than maybe to have more even. But I don't feel strongly that it needs more. I'm just saying if it were to change, that's the way I'd like to see that go. I think if it was reduced, of course, then your quorum is reduced and there's more likelihood for people to team up and have their way without taking a broader perspective. So I'm saying I like it the way it is. Again, anybody else?

Steve Kahn: I strongly support maintaining the current makeup of the board, and I think it does give a wider representation. That's one reason I had asked Sarah about the Safari Club International petition for revision, because in it they really want the petition to try to have it just the five representation from the five heads, that none of them have to be associated with Alaska, I believe, and so it would be a quorum of three. So theoretically there could be just three people making the decisions for the Federal Subsistence Board, which I think is an absolutely terrible idea. I strongly support maintaining the current makeup. If a reduction in numbers were to happen, they wouldn't even necessarily be Alaskans or subsistence users and it would be terrible.

Ned Fowler: I just want to say that I think that the current makeup is good. One thing that I would advocate more, if anything, would be more board members. I hope that the people who are on the board that are publicly appointed have different varying views, that there is a good mix of ideas.

Tinny Hedlund: I think it's just find the way it is.

Karla Jensen: No comments for me.

Warren Hill: Very good. Thank you. I guess we'll move on to number four, federal regulations and state regulations for duplication and inconsistency. Reading through the SCI thing, they were recommending that basically we drop federal regulations separate from the state and just align completely with state regulation unless there was some real outstanding need to do otherwise. And I think it's important for us to have both. Like for us, that would drop like ten days of the moose hunting season on the leading edge and the trailing edge of our moose hunt if we only applied the state regs, for instance. It gives our area more power and leniency to be able to cater to our specific needs. So again, I think it should stay the way it is.

Ned Fowler: I'm also on the Lake Iliamna State Advisory Council and always in our discussions there is a lot of discussion about, you know, rural subsistence needs in the area. I do think that with federal regulations, it is good to have those separate from the state. The only thing I would say is when possible to align them so there is less confusion with local users. I think it is important to have separate regulations. It also is important to try and simplify for subsistence users because it can get very confusing for people when they are different. But a lot of that might just be more education for rural subsistence users to know where to look for the appropriate regulations. It can get quite confusing trying to track down all those other regulations to try and mix and match everything together.

Tinny Hedlund: I think we need more information on where to find the federal rules. I don't even know where the federal rules are, but I like that where you have a lot more time to hunt.

Warren Hill: We already do try to align. I mean, our SRC makes every effort to try to make sure that any changes we do are to align with the state. So I think that already happens. I think part of the problem is that we're not on the same regulatory cycle. So maybe if any proposed change would be that the state and the feds would be on the same regulatory cycle, and if there's changes there could be cooperation to make changes at the same.

Ned Fowler: I wholeheartedly agree with that. There needs to be more communication between different agencies. There are going to be issues between the state regulations and the federal regulations because the federal regulations have a mandate for subsistence rural priority, while the state regulations do not have that priority and cannot have that priority. I think it is important when possible, to try and align them and to try steps to make it better or simpler for rural subsistence users to be able to find the regulations and to stay legal.

Steve Kahn: I know the SRC has always looked at the proposed regulations seriously and taken into consideration for our own subsistence needs of whether we agree or not. And I've brought this up in the past, that I really think we should be looking at these regulations as what's the best for the people that we represent, the subsistence users and the resource, and that we should go ahead and make those decisions, you know, based on that and not that it's always just the federal has to align with the state. I think the state should look at things and say, "Hey, we can align with the federal, because that makes more sense." It looks like, especially with this Safari Club International, they want everything aligned with the state, and that's obviously a bad idea. I mean, as far as coordination between the state and the feds, I think it's a good idea, but it's got to be really limited because of the state's constitution that will limit subsistence users from having any particular priority. And so, I think it needs to be limited, but there's no doubt that we need more clarity in these rules and to coordinate the seasons when we can, when it makes sense for both the state and feds.

Warren Hill: I have a question for Sarah or Eva. Do the state and federal boards have representation at each other's board meetings? Is there a state rep at the FSB board meetings?

Sarah Taylor: Yes, there's a few state people that show up to all the Federal Subsistence Board meetings. Whoever it is there that's representing the state will answer questions from the board frequently. Every proposal, they'll ask the state to weigh in. They don't have a vote, but they're like a consultant to the board or an advisor to the board. They're also involved in the development of the analyses of proposals, right, because they provide a lot of the data. And they participate in some of the staff committee discussions. And also federal bureaus go before the state boards. The Board of Game, Board of Fish, federal bureaus will go before the board to make proposals. That happens a lot. You probably see that at the AC level too, sometimes having those discussions. So there's a lot of cross-participation, but there's no vote. We don't

have a vote on the Board of Fish or the Board of Game just like they don't have a vote on the Federal Subsistence Board.

Warren Hill: I think that's a good thing they don't have a vote, but that's great to hear there's a lot of communication. Thank you.

So, it sounds like we generally like it the way it is, other than maybe if we can get the regulatory cycles changed so they match, so that when there is communication, we can align things in a much smoother way. Does anybody agree or disagree with that summary?

Steve Kahn: Yes, I agree.

Karla Jensen: I agree.

Tinny Hedlund: I agree.

Ned Fowler: I agree. Need more coordination and trying to align those cycles.

Warren Hill: Great. That leads us right into the number five, regulations governing special actions. I think the last time we attempted or had any input on a special action was when we tried to extend the moose season to align with the state. We attempted to do a special action for that because the regulatory cycles didn't line up and we couldn't put in the proposal to change the regulation. I can't remember if we actually did get a special action to do that, but basically I like it the way it is to have that option to be able to do something like that, or if we notice there's a resource that's really damaged in our area specifically, I mean, it can be very regional, say the ptarmigan are down just in Lake Clark or whatever, we can suggest the restriction of the harvest of them in our area. So I think it's great for the Federal Subsistence Board to have that option based on our opinions. Any thoughts?

Steve Kahn: I strongly support the idea of having continued use of the special action regulations. When that cycle takes so long to implement it can be put into place. For some reason, I think we had that in place before we had to go through the whole almost year cycle to get it put in, and it worked out well in that instance. So, I think it's a good tool that should remain.

Ned Fowler: I think the special action is a great tool to have, and I think we should always have that tool in our toolbox, and use it when it's needed, but make sure we have all the information about what is happening. I think it is a great tool in the toolbox to be able to use that when necessary.

Warren Hill: I'd be curious to know if there's ever been any cases of this being used in retribution or one user group going against the other. I guess that's always an opinion, but I'm not aware of that at all.

Number six, the role of state and Alaska Department of Fish and Game in the Federal Subsistence Management Program. It sounds like there already is a lot of coordination and cooperation and communication from the state at the FSB meetings, and we get a lot of input

from the state through our SRC and like Ned is on the advisory committee and we have members that are on the RAC. I think there already is a lot of state involvement, and I don't really think there's a need to change that level of involvement.

Steve Kahn: I agree with you.

Warren Hill: Doesn't sound like anybody has any other strong thoughts on this one.

Tinny Hedlund: I don't.

Warren Hill: Sounds like we prefer it just remains the way it is.

Karla Jensen: I agree.

Warren Hill: Very good. Sounds like we can move on.

The seventh item is the board's process for rural determinations. I'm not sure what this is asking other than possibly like population changes to a village or a rural community, or maybe Sarah or Eva has some input on this.

Sarah Taylor: The non-rural determination process now is not just population. When the program was first created, actually Ketchikan was the smallest of the communities that were decided not rural, but urban. And Ketchikan at the time was about 7,500 people, and so that became this kind of rough estimate for several years, like, if you get near 7,500 people, you're in danger of becoming urban. But that's not actually how it works, and that's never how it's worked. There are a lot of different factors that are taken into consideration, including the policy of the program which is to provide subsistence and to make sure that there is a priority for subsistence among consumptive uses of fish and wildlife. And so in knowing that that's true and in heading towards that goal, what kind of factors should we be looking at as communities undergo changes in their access to resources or in their available alternatives? We look at a lot of different things based on the law, so the process kind of lays that out now, and we were looking for feedback on that process.

Warren Hill: This kind of seems like you don't see a problem, I don't see a problem, until there is one kind of thing. Like, right now it seems like it's fine the way it is. I don't see a need to change any of this.

Ned Fowler: What is the, like, what's the smallest community now, or the largest community that has subsistence priority in the state now?

Sarah Taylor: I don't know that, but it might be Ketchikan. That might be because it's right on the cusp.

Eva Patton: It's outside of the Lake Clark SRC region and you're probably not aware, but just last year, the Federal Subsistence Board did take up a proposal that was submitted by the Ketchikan Indian community requesting rural determination status. And there was a very extensive

analysis and public process. Ultimately, the Federal Subsistence Board did vote to recognize Ketchikan as a rural community. And that just went into effect this summer along with the Federal Subsistence Fisheries Regulation being published in the Federal Register. Now they are currently the largest community with a rural designation. The rural, non-rural determination process went through a review, which was an extensive public process that went before all the RACs and rural communities and public input throughout all of Alaska, and the policy was amended. There used to be a population threshold of 7,000 that would trigger a review if that community still exhibited rural characteristics. But that was changed in the last rural, non-rural determination policy review. Now the Federal Subsistence Board is not looking at a population threshold, they're looking more specifically at rural characteristics and non-rural characteristics. And in part of that review process, the RACs also determined that rural characteristics should be described by region, that they're different for different regions. So while the regional advisory councils don't have difference on rural as they do with Federal Subsistence Fisheries or Wildlife Harvest, they are able to make recommendations that are unique to their region.

Warren Hill: That's great for Ketchikan. It would be interesting to see if, after that, there's going to be more of a push for towns that don't have it to look for new determinations. So my opinion is that it works. Any other thoughts?

Steve Kahn: I basically agree with you, Warren. I don't know that we have enough information to say that it's not working, so I think it is. I'm all in favor of just leaving it like it is.

Tinny Hedlund: I agree.

Warren Hill: Well, it sounds like there's no other real strong opinions on it. I should just agree that we like it the way it is.

So number eight is an option if we have any other additional recommendations, to bring them up.

It sounds like we kind of already did when we were talking about aligning regulatory cycles and looking for other better ways to promote SRC memberships. I saw a lot of comments from the other RACs and SRCs talking about possible compensation for board or for chair members. Of course, it would be nice. A lot of us take time away from work to attend meetings, but I don't feel strongly about it. We're all here because we're passionate about the resources and our lifestyles. Part of me wants to support what all the other RACs are requesting, but personally I don't feel strongly that we need any sort of compensation. Anybody else have any other thoughts or any other additional recommendations to put down in writing here?

Steve Kahn: I'm not sure if this would be appropriate for this particular secretarial review, but I know we've talked about in the past SRC meetings that traditionally we're supposed to have an three SRC members that's also with the RAC, you know, shared members, so we can share that information back and forth over the region. Traditionally that's been the toughest membership to fill, and we have talked in the past about having at least one of those seats being sort of an

at-large seat, and I don't know if this would be an opportunity to, you know, have that change. I don't even know who would be selecting the at-large seat in case we couldn't fill all three seats for the SRC that are required that we could have at least one of those floating seats that we could, you know, maintain a healthy membership in the SRC. I don't know if Sarah thinks that this would be an appropriate comment to make here, or is that just for someplace else?

Sarah Taylor: No, I think that's a great comment to make here. That's perfect. Yeah, that can be an easy fix and be easily wrapped into part of any other fix.

Steve Kahn: Okay, Thank you. That would be my suggestion, is to add something similar to that, that we want to have one of those seats be at large to help our membership in the future.

Warren Hill: Sure, I don't see why not. I wonder if that's a problem with other SRCs as well.

Eva Patton: I can jump in and add a little context. The subsistence resource commissions were created under Title 8 of ANILCA. In the same way the RACs were created under 805 the subsistence resource commissions were created under Title 808 of ANILCA. And it's pretty prescriptive in terms of membership. It describes the SRC as having three members appointed by the Secretary of the Interior, three members appointed by the Governor of Alaska, and three members appointed by the local regional RAC. And the RAC appointment can be either a RAC member serving on the regional RAC in the SRC region, or it can be an AC member who is then recommended to the RAC to appoint. So there's a little flexibility there that it can be somebody who's involved with the local AC and they don't have to be a RAC member. But you're right, and this is the case for all the SRCs, it can be very difficult to find someone who also lives in a resident zone community. It can be very difficult to find that unique combination. And then you're relying on that individual who's from a resident zone community being appointed on the RAC and then being interested to take on the additional role of serving on the SRC. And then we've had a lot of difficulty, too with the local state ACs, in that not all of them have been active, and so there's been either quite a bit of turnover on participation on the ACs, or they're not holding regular membership election meetings. So that is definitely one of the most difficult positions to get appointed to the SRCs, and all of the SRCs are struggling with that. Because it is in ANILCA that the RAC appointing three members is set, it would take an amendment to ANILCA to change that. But there might be some leeway in terms of the criteria for that individual. Right now it's, you know, a member of a local AC or appointed to the RAC.

The other common recommendation from both the RACs and the SRCs, is to expedite the secretarial appointment process. This process is often delayed and takes a very long time. Right now, we have a call for secretarial appointment applications and nominations, and it's nine months delayed because of a hold on the federal register process and then the process itself takes a full year to a full year and a half from application to appointment.

And that's the same on both the RACs and the SRCs. So, you know, expediting the secretarial appointment process may actually help, you know, as we're waiting for someone who's, you know, local to the region and a resident zone community member being appointed to the RAC or, you know, filling those secretarial seats on the SRC as well. So I'll look into it, but in terms of the flexibility, and I think it's good to make that recommendation for sure, but ANILCA itself is pretty prescriptive in terms of three members appointed by the Secretary of the Interior, three members by the State of Alaska, and then three members by the RAC. So we may not have a lot of flexibility with the RAC appointment.

Liza Rupp: With the Lake Clark SRC, our only AC is Lake Iliamna, and I would echo what Eva said is that the membership is not always up to date. I look at the membership list regularly to try and find likely SRC candidates and a lot of them are from non-resident zone communities and we can't tap those folks. Then there are lots of people whose terms have expired because the communities haven't held their elections. So it's difficult.

Steve Kahn: I guess it sounds like the best that we can do right now is actually note the concern and let you guys figure it out if it can be figured out.

Warren Hill: We can suggest the difficulty with the RAC appointees. It doesn't sound like it's impossible to amend ANILCA, but it would be very difficult. But we can suggest it.

Sarah Taylor: I was just going to point out that there's all sorts of fixes that can come out of this that are short of amending ANILCA, too. Like maybe we could have more of a conversation with the state about its AC program. And maybe there are ways that we can support helping them get those staffed back up or, if they're having difficulty with recruitment, maybe we can join forces. You know, there's a lot of things that we can do to try to address the problems short of a legislative solution.

Eva Patton: Yes, and I would agree, too. And I think we can work with our RACs also in terms of recruitment for representation of resident-zone communities for the SRCs, you know, more education about that important overlap and exchange of information between the SRCs and the RACs and maybe help with that RAC recruitment process. And bringing awareness, too, to the Secretary's Office that long delays in the secretarial appointment process also have an impact. I know we've lost people who've applied who then lost interest after they accepted a position on another committee while they were waiting for a year and a half or two to be appointed. I think bringing awareness to this and, as Sarah had suggested I think there are avenues that we can help improve it within the appointments that are set in ANILCA.

Warren Hill: Yes, such as, bringing that authority to appoint somebody from the Secretary of Interior into our region, like maybe somebody like Sarah could approve those instead of going all the way to Washington. So streamlining the process for bringing on Secretary of Interior appointees and also looking for better ways to get RAC members.

Any other recommendations, folks?

Steve Kahn: None for me. I'm good.

Karla Jensen: None for me

Ned Fowler: I'm good.

Warren Hill: I think that covers our topics here. Any closing comments from anybody? And where do we go from here?

Liza Rupp: I'm still going to try and get you something early in the week because I have leave scheduled shortly, so it will probably be easier if we have something. I will share it with the group once I have a draft of your comments. I always appreciate Steve and anyone else's editing to my attempts.

Steve Kahn: I just wanted to say thank you to all the commissioners that attended today. I really appreciate that. And Liza and Eva for helping us out with questions, and Grant for listening in. I appreciate it very much.

Warren Hill: I echo Steve's comments. Thank you, Sarah, Eva, Liza, Grant. It's always great to hear from everybody, and I learned a lot myself, and I appreciate the opportunity to comment on this.

**Public and Agency Comments:**

None

**Set time and place of next SRC meeting:**

The next meeting will be held in Nondalton on April 25, 2026, which is the backup meeting date.

**Meeting Adjourned:**

MOTION by Steve Kahn to adjourn the meeting at 2:21 pm.

SECONDED: Ned Fowler

MOTION CARRIED