

Bristol Bay Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

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MARCH 03 2025

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I write to you on behalf of the Bristol Bay Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the March 21-28, 2025, Statewide Alaska Board of Game (BOG) Meeting.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Bristol Bay Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 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. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on February 18, 2025, in Naknek, and took up eight BOG Proposals. Please see the Council comments below.

Proposal 87: Restrict the use of boats for hunting waterfowl

The Council **opposes** Proposal 87, which would restrict the use of boats for hunting waterfowl. The proposed requirement for a boat to be anchored or beached within 100 yards of anyone discharging a firearm would be difficult to comply with and enforce. Current regulations already prohibit waterfowl hunting from a motorboat unless the motor is off, and the boat's forward movement has stopped.

The Council is also concerned about the potential safety risks this regulation could pose to waterfowl hunters. Hunters in the Bristol Bay region navigate tidal gullies with thick mud, steep banks, and up to 24-foot tides. Requiring boats to be anchored or beached could create hazardous situations. Additionally, the Council is concerned about how hunters would retrieve dead or injured birds if this regulation was enacted.

Proposals 126, 127, and 128: Allow the use of electronically enhanced night vision and forward-looking infrared device for taking furbearers statewide

The Council **opposes** these three proposals allowing the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers. The Council believes these technologies could be misused if the regulation was approved, creating an unfair advantage. Additionally, we see no legitimate need for such devices in our region, aside from potential misuse.

Proposals 129 and 130: Establish a minimum standard of centerfire rifle cartridges for taking big game

The Council **opposes** Proposals 129 and 130 because it is an unnecessary restriction on hunters. Effective hunting depends more on shot placement than caliber size. A well-placed shot with a smaller cartridge can be more effective than a poorly placed shot with a larger one.

If passed, this regulation could also impose additional costs and burdens on hunters who may be forced to purchase new firearms and ammunition, creating an unnecessary financial strain. In remote or rural areas, ammunition availability is often limited, and requiring a minimum cartridge size could make it even more difficult for hunters to find suitable ammunition.

Proposal 131: Require identification tags be attached to traps and snares

The Council **opposes** Proposal 131, which would require trappers to place identification tags on traps and snares. The Council believes this regulation imposes an unnecessary burden on trappers.

Additionally, the Council is concerned about potential negative consequences if an identification tag is lost or destroyed. Wolverines and other animals can struggle vigorously when trapped, potentially breaking off the tag. Identification tags may also become buried or frozen, leading to unintentional violations.

The Council is also worried about the risk of trapper harassment from the public and the disruption human presence and scents near traplines could cause, potentially reducing the chances of harvesting furbearers.

Proposal 133: Prohibit trappers from using snowmachines to approach and pursue the take of wolverine

The Council **opposes** Proposal 133, which would rescind the regulation allowing hunters and trappers to use snowmachines to approach and pursue wolverines.

The Council and the Bristol Bay community have worked for many years to establish this regulation, as this method of harvesting wolves and wolverines is a long-standing subsistence practice in the region. Snowmachines are a critical tool for trappers in Alaska, where vast, rugged, and remote terrain makes foot travel impractical. Restricting their use would negatively impact traditional trapping practices.

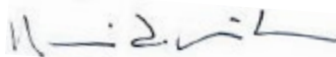
Wolverines cover large territories and move quickly, making snowmachines an effective way for trappers to access active trapping areas. Revoking this regulation could harm the subsistence economy, as many rural Alaskans rely on trapping as part of their livelihood. Limiting snowmachine use would make trapping wolverines less viable, reducing income and fur availability.

Additionally, many hunters sell wolverine hides to fund fuel purchases for hunting other species. If enacted, this proposal would reduce critical harvest opportunities for those in the Bristol Bay Region.

The Council supports the existing regulations, in place, that allow hunters and trappers to use snowmachines to approach and pursue both wolves and wolverines.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Leigh Honig at (907) 891-9053 or leigh_honig@ios.doi.gov.

Sincerely,



Nanci Morris Lyon
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Bristol Bay Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record