

Eastern Interior Alaska Subsistence Regional Advisory Council

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

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Eastern Interior 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 19-20, 2025, in Fairbanks, and took up 11 BOG Proposals. Please see the Council comments below.

Proposal 88 – Add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Alaska Department of Fish and Game

The Council **supported** **Proposal 51 on a 9-1 vote.** Alaska Natives customarily and traditionally harvested and used wood bison for subsistence prior to their expiration. This is documented through oral history and the archeological record. In the future, when a harvestable surplus of wood bison becomes available, the ability to harvest them for cultural purposes must be allowed due to their historical use for subsistence. The cultural harvest of wood bison was

severed only because of their extirpation. The reintroduction of wood bison provides a chance for cultural practices and use of wood bison to be revitalized. Allowing wood bison to occasionally be harvested for potlatches and other cultural events will enable the traditions of their harvest and use to be passed on.

Proposal 89 – Require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second degree of kindred

The Council **supported** Proposal 89 on a unanimous vote. The Council agreed that these should be requirements statewide for nonresident moose hunters. The Council's hope is that this would increase nonresidents' awareness of proper firearm selection and meat care, and reduce waste of meat.

Proposal 92 – Require sheep hunters to complete an online education course

The Council **supported** Proposal 92 on a unanimous vote but noted that this requirement should only apply to first time sheep hunters. The Council notes that this will help increase awareness of how to properly identify legal sheep in the field. Because it is online, it will not be a significant burden to hunters.

Proposals 95 & 96 – Repeal the age criteria for the definition of full-curl horn ram

The Council **supported** Proposals 95 and 96 on a unanimous vote. The Council noted that it is very difficult to age a sheep by counting annuli, especially in the field at a distance. This proposal would focus harvest on only full curl rams, which is important due to the current low sheep numbers. It would also reduce the harvest of sub-legal rams.

Proposals 97 & 98 – Lengthen the time period hunters are restricted from using aircraft for hunting sheep

The Council **supported** Proposals 97 and 98 on a unanimous vote. The Council noted that aircraft should not be used for spotting sheep at any time, including during youth hunts. The Council agreed with the proponents that passing these proposals would reduce pressure on sheep during a time when they are experiencing conservation concerns.

Proposal 99 – Shorten the time period hunters are restricted from using aircraft for hunting sheep, and modify the use of aircraft restrictions

The Council **opposed** Proposal 99 on a unanimous vote. The Council noted that sheep are facing a conservation concern and use of aircraft to hunt them should not be liberalized at this time.

Proposal 100 – Limit nonresident sheep hunting opportunity statewide so that nonresidents do not harvest more than 35 percent of total sheep harvest from any game management subunit

The Council **opposed** Proposal 100 on a unanimous vote. The Council noted that this proposal

is way too complicated to be dealt with in this manner. Every region and sheep population faces different issues, and the one size fits all approach of this proposal is not appropriate. Instead, the Council advocates for using regional sheep working groups or coalitions to bring stakeholders together and discuss proposal ideas on a region-by-region basis. The Council has sent out an invitation to Advisory Committees in the Eastern Interior region to form a sheep management coalition to discuss such topics together.

Proposal 101 – Add sheep to the list of species identified as important for providing high levels of human consumptive use

The Council **supported** Proposal 101 on a unanimous vote. The Council noted that this proposal is very important because sheep are not currently listed as a species eligible for intensive management. Sheep populations are in decline, and tools for helping them recover are limited without the passing of this proposal. Intensive management is a prerequisite for any predator control efforts.

Proposal 123 – Allow remuneration to be provided to proxy hunters

The Council **opposed** Proposal 123 on a unanimous vote. The Council feels strongly that people should not be paid to go hunting or paid to give their permit to someone else. The proxy hunting system exists to help people get the food they need that they would otherwise be unable to obtain on their own. This system is based on the values of helping others, and it should not be monetized or turned into a market hunting system. Additionally, the Council notes that the proponent wrongly states that remuneration is allowed in the Federal designated hunter permit system. It is not.

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 Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Robert “Charlie” Wright, Sr.
Chair

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