

**North Slope Subsistence Regional Advisory Council**  
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In Reply Refer To:  
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MARCH 05 2025

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

Dear Chair Fletcher,

I write to you on behalf of the North Slope 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 North Slope 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 28, 2025, in Utqiagvik, and took up three BOG Proposals. Please see the Council comments below.

**Proposal 86: Harvest Tickets and Reports**

The Council **opposes** Proposal 86, which would require mandatory harvest reporting of sea ducks throughout the State. Sea ducks are an important part of the diets of the people of the North Slope Region, and the Council believes this reporting requirement would impose a burden on subsistence users in the region.

**Proposal 151: Brown Bear Tag Fee Exemption**

The Council **supports** Proposal 151, which would reauthorize the resident tag fee exemptions for brown bears in Game Management Units (Units) 18, 22, 23, and 26A. The Council concurs with the justifications provided by the North Slope Advisory Committee, as discussed in their February 20, 2025 meeting and believes the reauthorization of this proposal would alleviate the burden associated with purchasing a \$25 tag and minimize confusion on brown bear harvest regulations among users.

**Proposal 165: Hunting Seasons and Bag Limits for Moose**

The Council **supports** Proposal 165, which would reauthorize the resident antlerless moose season in Unit 26A with an **amendment** to extend the antlerless moose season through September 30. The Council's support for the amendment aligns with the recommendation of the North Slope Advisory Committee provided in their February 20, 2025 meeting. Furthermore, the Council concurs that extending the season through September 30 can increase harvest opportunities for users and is unlikely to negatively impact the moose population within the specified portion of unit 26A.

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 Gisela Chapa at (907) 310-6129 or [gisela\\_chapa@ios.doi.gov](mailto:gisela_chapa@ios.doi.gov).

Sincerely,



Brower Frantz  
Chair

cc: Federal Subsistence Board  
Interagency Staff Committee  
North Slope 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