

Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
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In Reply Refer To:
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MARCH 06 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 Western 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 Western 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 25-26, 2025, in Fairbanks, and took up three BOG Proposals. Please see the Council comments below.

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

The Council **supports** Proposals 95 & 96, which would remove one of the three criteria for determining a legal full-curl ram. As the Council submitted one of these proposals, rationale for support is within the proposal itself, namely that accurately ageing a sheep in the field at a distance is extremely difficult even for experienced sheep hunters.

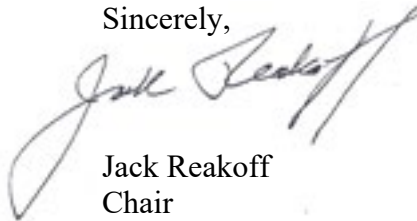
The Council suggests that if the BOG is reluctant to enact this regulation, that it be passed for a test period, set to sunset in six years, or two BOG cycles. This will allow time to gather data on sublegal sheep harvest using only the measuring the curl and broomed tips methods to be able to compare to sublegal harvest utilizing all three methods for determining a full-curl ram.

Proposals 119: Change the boundary between Units 21E and 21D.

The Council opposes Proposal 119, which seeks to change the boundary between Units 21E and 21D. The Middle Yukon Fish and Game Advisory Committee is opposed to this boundary change and the Council believes that any change in boundaries should be agreed upon by all relevant Advisory Committees. Additionally, the passage of this proposal would misalign State and Federal boundaries for the Unit 21 subunits, which would lead to increased regulatory complexity.

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 Nissa Pilcher at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Reakoff". The signature is fluid and cursive, with a large initial "J" and "R".

Jack Reakoff
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Western Interior 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