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0138
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                    FEDERAL SUBSISTENCE BOARD
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                           WORK SESSION
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                            VOLUME II
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                 U.S. FISH AND WILDLIFE BUILDING
11
                        Anchorage, Alaska
                          July 24, 2025
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     MEMBERS PRESENT:
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     Anthony Christianson, Chairman
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     Charles Brower, Public Member
     Rhonda Pitka, Public Member
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     Benjamin Payenna, Public Member
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     Raymond Oney, Public Member
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     Frank Woods, Public Member
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     Sara Boario, U.S. Fish and Wildlife Service
27
     David Alberg, National Park Service
28
     Kevin Pendergast, Bureau of Land Management
29
     Glenn Chen, Bureau of Indian Affairs
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     Greg Risdahl, U.S. Forest Service
31
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33
34
     Lisa Doehl, Solicitor's Office
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0139
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                      PROCEEDINGS
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                 (Anchorage, Alaska - 7/24/2025)
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 5
                     (On record)
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                     CHAIRMAN CHRISTIANSON: Welcome back
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     everybody. I'm Anthony Christianson, Board Chair.
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     We're reconvening yesterday's -- somebody's got me on
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     feed through back here.
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                     MR. BROWER: Mr. Chair.
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                     CHAIRMAN CHRISTIANSON: Yeah, go ahead,
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     Charlie.
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                     MR. BROWER: If I may introduce a
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    person here that's just walked in.
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                     CHAIRMAN CHRISTIANSON: You have the
21
     floor.
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                     MR. BROWER: Fenton Rexford, you can
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     come up and introduce yourself, please.
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                     MR. REXFORD: This looks familiar. I
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     was one of the original RAC members in 1990, 35 years
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     ago, and I just wanted to stop by and say hello. My
29
     name is Fenton Rexford from Kaktovik on Barter Island,
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     and it's in ANWR. We fought tooth and nail for our
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     subsistence way of life here, and still struggling and
32
     the biologists, a couple of them, I just wanted to --
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     the moose travel a lot and we go to certain zones,
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    there's A, B and C hunting zones on 26 for three
35
    hunting zones, and these critters move around. And to
36
    be restricted to an area that is far away is not right,
37
     so you need to think about the moose moving around.
38
     That's one of our last battles. But anyway, muskox
39
    management, those kind of things happened when I was
40
     going on. So I just wanted to stop by and say hello to
41
    my nephew and glad that he's with you folks and he's
42
    been in wildlife for eons.
43
44
                     So I thank you very much. I appreciate
45
     the work that you do in the various regions, Western,
46
     Bristol Bay, Eastern Interior, North Slope, Southeast,
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     I think there was one there too, Cook Inlet. So thank
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     you all, the 10 members that help work in the Federal
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Program. With that, I want to thank you, Tony, I

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wanted to stop by and say hello real quick.

CHAIRMAN CHRISTIANSON: Thank you. And we appreciate your service, we wouldn't be here if the original RAC members weren't there, so, thank you.

I think that gave us an opportunity to wrinkle out our technical difficulties. Oh, sorry, that's me.

## (Laughter)

CHAIRMAN CHRISTIANSON: At this time we're going to take up Wildlife Proposal 24-01, that was our time certain today and so we'll go ahead at this time, call on the Staff to present.

MR. VICKERS: The analysis for Proposal WP24-01 is in your meeting books on Page 73. For those online the analysis is found on the Office of Subsistence Management website under Federal Subsistence Board upcoming meeting materials.

Good afternoon, Mr. Chairman, esteemed Board members as well as Chairs for the Regional Advisory Councils. My name is Brent Vickers and I am the Anthropology Division Supervisor at the Office of Subsistence Management.

This proposal was submitted for the 2024 wildlife cycle by a resident of McCarthy, Alaska, who requests that the Federal Subsistence Board allow for the sale of brown bear hides under Federal Subsistence regulations. The Board deferred this proposal at its April 2024 meeting for two reasons; 1) to potentially establish a work group to negotiate with the Alaska Department of Fish and Game concerning the use of its permit to sell brown grizzly bear hide and/or skull and, 2) to allow time to explore options for Federally-qualified subsistence users to obtain a permit allowing for the sale of a hide from a Federal agency. The following year, in February 2025, OSM presented the proposal again to the Board, this time with an added addendum with new information and a new revised OSM conclusion, which I'll refer to as OSM revised conclusion. The added addendum, which starts on Page 15 of the analysis, which is on Page 87 in the meeting book addressed the Board's reasons for deferring the proposal and contained information such

1 as the OSM revised conclusion, that Regional Advisory Councils had not yet seen when they first made the recommendations in fall of 2023, so at the February 2025 Board meeting the Federal Subsistence Board, 5 again, deferred action on this proposal. At that time the Board requested that all 10 Regional Advisory 6 7 Councils provide new recommendations at their winter meetings on the added addendum and the OSM revised 8 9 conclusion. OSM then presented the added addendum with 10 the OSM revised conclusion to each of the 10 Regional 11 Advisory Councils at their respective 2025 winter 12 meetings, each Council made a new 2025 recommendation 13 on the revised conclusion. Before we get to those RAC 14 recommendations I'll continue with this brief 15 presentation so everyone's caught up on the main concerns and the OSM revised conclusion. 16

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The Federal Subsistence Board first deferred action on the proposal in 2024 because adopting it, as submitted, might conflict with the Convention on International Trade and Endangered Species, also known as CITES, an International Treaty. The U.S. Fish and Wildlife Service has delegated to the State of Alaska, Department of Fish and Game, the authority to provide for International trade of brown bear hides only if ADF&G -- is my time up -- okay.

262728

(Laughter)

29 30

MR. VICKERS: All right, I'm done.

31 32

(Laughter)

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MR. VICKERS: Only if ADF&G issues permits reporting that the trade will not be detrimental to the survival of the species in the wild, therefore, a permit from the ADF&G is required. Alaska Department of Fish and Game issues a permit to sell a hide of brown bear but only if taken in an area with a two brown bear harvest limit. State of Alaska limits sales on hides because unlimited sales might incentivize legal and illegal harvesting in Alaska and elsewhere in North America. For this reason, State of Alaska's purpose is to prevent hides from entering the commercial markets. While limiting the sale of brown bear hides is necessary for hundreds -- for the hundreds of brown bears harvested in sport and general hunts each year in Alaska in which edible meat may not be salvaged, the much lower number of brown bears

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harvested for subsistence for which the edible meat must be salvaged does not need the same level of restrictions on the sale of hides.

So that brings us to the OSM revised conclusion, which begins on Page 20 on the analysis, and Page 92 in the meeting books.

 $$\operatorname{\textsc{The}}$  OSM revised conclusion is to support WP24-01 with modification.

12 Whoa.

(Laughter)

 MR. VICKERS: With modification that the hides of brown bears with or without claws attached may be purchased within the United States for personal use and not be resold. The -- what's going on?

(Sound amplifies)

MR. VICKERS: Okay. The hunter must request an OSM customary trade permit and must return the permit. Additionally, this modification eliminates regulations requiring the skin and the skull and the claws of the brown bear hides to be retained at the time of sealing in certain areas.

As justification for the revised conclusion, the Federal Subsistence Board deferred the proposal on April 2024 because adopting it as submitted might conflict with CITES. In response, OSM modification allows a sale of a hide of brown bear under Federal subsistence regulations, the bear may be taken in an area with one or two bear harvest limits. The focus of the OSM modification is to limit sales to purchase within the United States. CITES only limits International purchases of brown bear hides. This modification allowing only for domestic purchases does not conflict with CITES. As with the State of Alaska's regulations and permit requirements, the OSM customary trade permit requires that; 1) the purchase of a hide for the personal use and not -- or purchase of the hide must be for personal use and not be resold; and, 2) the seal number must be identified in any advertisement for sale. This allows for enforcement to identify that a brown bear hide advertised for sale on the internet, for example, is from a legally harvested brown bear.

The OSM modification, however, allows for the hide to be sold with or without claws attached and will allow a Federally-qualified subsistence user who removes a claw to incorporate it into a handicraft to then sell the hide.

Finally, the OSM modification removes from Federal regulations the requirement in some areas that Alaska, that at the time of sealing, the sealing official must remove and retain the skin of the head and the front claws of the bear hide. Current Federal eligible meat salvage requirements will likely protect brown bears from over harvest.

In conclusion, the OSM modification complies with provisions of CITES and allows Federally-qualified subsistence user to legally sell hides of brown bears while balancing customary trade conservation. Also, it's important to note if the Board adopts this proposal, the regulation will not be effective until the Office of Management and Budget, or OMB, approves for the development of a new Federal permit allowing for the sale of brown bear hides under Federal regulation.

 $$\operatorname{\textsc{Thank}}$  you for your attention, this is the end of my presentation and I'm available to answer questions.

MR. BROWER: Mr. Chair.

 $\label{eq:CHAIRMAN CHRISTIANSON: Yes, you have the floor, Charlie.} \\$ 

MR. BROWER: Just a question. It's the beginning -- the process beginning of selling brown bear hides, but is there a grandfather right to the previous harvested animals? No?

 MR. VICKERS: Thank you, Board Member Brower. I believe that it was looked into, this was a question that was raised at the last Board meeting and, no, from what I have read and someone correct me if I'm wrong, but, basically, no, you cannot grandfather previously harvested hides, bear hides.

0144 1 MR. BROWER: Thank you. 2 3 MR. VICKERS: Thank you. 4 5 CHAIRMAN CHRISTIANSON: Any further 6 questions. Sara. 7 8 MS. BOARIO: Thank you, Mr. Chair. 9 Fish and Wildlife Service. Can you tell us more about the development of the new Federal permit with OMB, I 10 11 guess what else have you guys learned about that, the steps in that process, or? 12 13 14 MR. VICKERS: Thank you for that 15 question, Chair Member Boario. I probably know about 16 as much of OMB as you do, probably a lot less, I know 17 it could take awhile, that is certain. If our 18 regulation specialist Justin Koller's online and would 19 like to approach this or if it looks like Wildlife 20 Division Supervisor Lisa Grediagin would like to get at 21 this I hand the mic over. 22 23 MS. GREDIAGIN: Thanks. For the 24 record, my name's Lisa Grediagin, the Wildlife Division Supervisor with OSM. And, again, if Justin's online he 25 26 might want to jump in as well and provide 27 clarification. But my understanding is that any 28 additional information collection, it requires OMB 29 approval, and so this additional customary trade permit 30 is additional information and so we have to put that 31 information in a proposed rule and so once the Board --32 you know, assuming the Board adopts this proposal, then 33 we could put that information in the next -- like the 34 Fisheries Proposed Rule, and hopefully it would be 35 approved through that and then it could be finalized in 36 the 2026 wildlife final rule. That's our hopeful 37 timeline. 38 39 MS. BOARIO: Follow up. 40 41 CHAIRMAN CHRISTIANSON: Yes. 42 43 MS. BOARIO: So that sounds like, so 44 there's a couple pieces, right, like that sounds like 45 the Paperwork Reduction Act piece of it, where you have 46 to like notice that you're going to be collecting 47 information from people in the Federal Register. But

then there's like the administration of the permit

piece too, like what does that look like?

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MS. GREDIAGIN: So you're asking -assuming OMB approves it and we're able to implement the permit, I mean my understanding is it would be implemented just like any other Federal permit, you know, we create it in our data base just like any other harvest permit and then it could be issued through Federal managers, you know, at field stations or, you know, they could request it through OSM and then there's also the reporting requirement that they would have to return that to OSM, that we would track the bears sold. But I mean to be honest with you I think some of these details would have to be worked out, you know, afterwards with OMB and through the development of the permit. So I mean I guess if the Board has any strong feelings about the permit, you know, you could provide those details now to make sure they're considered and incorporated.

CHAIRMAN CHRISTIANSON: I hear Justin's online if you wanted to add anything, you have the floor.

MR. KOLLER: Thank you, Chairman Christianson. Members of the Board. I think everything was covered pretty well. Yes, it's a Paperwork Reduction Act requirement that we go through OMB for approval for a new permit, which does take a bit of time. And then once we're approved for that permit it's going to be handled through the permitting system as usual.

Thank you.

CHAIRMAN CHRISTIANSON: Thank you, Justin. Any other further questions from the Board for Staff on the analysis.

(No comments)

CHAIRMAN CHRISTIANSON: Thank you. I think next we call on Orville, summary of tribal consultation.

MR. LIND: Quyana. Quyana, Mr. Chair and Council members. Glad to be here, and this is going to take awhile. We have not had any tribal consultations on Wildlife Proposal 24-01, and that's my report.

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0146
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                     CHAIRMAN CHRISTIANSON: Are you sure,
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     Tribal Liaison, for the record -- thank you, Orville.
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                     (Laughter)
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 6
                     CHAIRMAN CHRISTIANSON:
                                            No voice means
 7
     concurrence, oh, I mean, you know, I mean if nobody
     jumps up on the sidelines and hollers.
 9
10
                     (Laughter)
11
12
                     CHAIRMAN CHRISTIANSON: What are we on
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     now, I'm getting in trouble here. Before we open the
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     floor to tribes and ANCSA Corporation testimony,
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     anybody here in the building, anybody online would like
16
     to be recognized, this is your opportunity if you
17
     represent a tribe or an ANCSA Corporation.
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19
                     (No comments)
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21
                     CHAIRMAN CHRISTIANSON: That would be
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    Number 5, to raise your hand.
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24
                     MS. LEONETTI: Star five.
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26
                     CHAIRMAN CHRISTIANSON: Or six to
27
    unmute your phone, star six.
28
29
                     (No comments)
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31
                     CHAIRMAN CHRISTIANSON:
                                             Hearing none,
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    next on our agenda to be heard is the SRC Advisory. I
33
     think Eva.
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                     MS. PATTON: Thank you, Mr. Chair and
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     members of the Board. For the record, Eva Patton,
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     Subsistence Program Manager for the National Park
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     Service. We did have several Subsistence Resource
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     Commissions that had originally made a recommendation
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     on the original WP24-01 proposal back in 2024 and then
     only two that either had an opportunity, due to the
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42
    timing of the latest version, that made a
43
    recommendation, and I'll provide comments for all
44
    except for Wrangell-St. Elias, we do have Barbara
    Cellarius who is the Coordinator for the Wrangell-St.
45
46
    Elias SRC so she can provide that SRC's comment.
47
48
                     So in 2024 the Kobuk Valley, Gates of
49
     the Arctic, Aniakchak and Wrangell-St. Elias SRC's all
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supported the original WP24-01 and then, again, for this year in 2025 either due to the timing of it coming before the SRCs during their spring meeting only Lake Clark and Wrangell-St. Elias provided comment on this updated version.

So the Lake Clark National Park Subsistence Resource Commission met in Pedro Bay on April 26th of 2025 and the SRC reviewed the Federal Wildlife Proposal for WP24-01 regarding the sale of brown bear hides that have been taken under Federal subsistence regulations that will be considered by the Federal Subsistence Board during the upcoming summer work session. The SRC wanted to provide comments, they did not make a formal recommendation to take action on this proposal officially but they did want to share their thoughts and concerns with the Board.

So while several members expressed support for the idea of providing more opportunities for subsistence users, multiple members also disagreed with the idea that a subsistence user should be permitted for profit commercially from a subsistence harvest. As one member stated, they feel both ways, it's good to be able to do with more with your harvest but it would only be subsistence harvest that you're allowed to profit off of and that's not why they're given the opportunity that individual felt. another member of the SRC also felt that if the sale of hides was approved it should only be allowed if the claws and feet were removed prior to the sale. to requirements for other bear hides. Several members also repeated their concern that allowing the sale of brown bear hides could potentially incentivize the taking of brown bears primarily for their hides and not for the meat.

So they did want to express those concerns but, again, did not make a formal recommendation one way or the other on this proposal.

 $\,$  And then we do have Barbara Cellarius online to present the Wrangell-St. Elias SRC comments.

Thank you.

 $\mbox{CHAIRMAN CHRISTIANSON: Thank you, Eva.} \label{eq:chairman} \mbox{Any questions for Eva on what's presented so far.}$ 

0148		
1		(No comments)
2		
3		CHAIRMAN CHRISTIANSON: You have the
4	floor, Barbara,	online.
5	,,	
6		MS. CELLARIUS: Thank you, Mr. Chair.
7	Till inst shock	and make sure that you can hear me.
	I II Just Check	and make sure that you can hear me.
8		CULTINAL CULTICATINGON II
9	6.1	CHAIRMAN CHRISTIANSON: We can hear you
10	fine.	
11		
12		MS. CELLARIUS: Great, thank you very
13		ne is Barbara Cellarius. I am the
14	Subsistence Coor	dinator for Wrangell-St. Elias National
15	Park and Preserv	ve and in that capacity I provide Staff
16		Vrangell-St. Elias National Park
17		ource Commission, which met in Copper
18		on February 25th and 26th, 2025 and at
19		SRC reviewed the addendum to deferred
20		al 24-01 and would like to provide the
21	following commer	
22	TOTIOWING COMME	10.
23		The Managell Ct Elice Notional Deals
	C. b. '. l	The Wrangell-St. Elias National Park
24		ource Commission unanimously supported
25		e revised OSM conclusion and addendum.
26	_	rement to salvage hides, subsistence
27		able to sell them. Additionally,
28	<del>-</del>	of brown bear hides is important for
29	use in handicraf	fts. One member noted that he doesn't
30	make handicrafts	s himself but he could sell the hide to
31	someone who does	s make and sell handicrafts.
32		
33		So that concludes the SRC comment.
34		
35		Thank you.
36		1
37		CHAIRMAN CHRISTIANSON: Thank you.
38	Thank you for th	nat presentation. Again, any questions.
39	Illalin you lot ci	iat presentation. Ingain, any questions.
40		(No comments)
41		(NO COMMETICS)
42		CHAIDMAN CHDICHIANCON. Bhonk was Erro
	mb - b - D - b -	CHAIRMAN CHRISTIANSON: Thank you, Eva.
43		ara. I'll move on, at this time we open
44		public, anybody here in the audience,
45	_	no would like to speak to this this is
46	your opportunity	y, general public.
47		
48		(No comments)
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0149
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                     CHAIRMAN CHRISTIANSON: And, operator,
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     if anyone is queuing you this is their opportunity.
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     Thank you.
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 5
                     (No comments)
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                     CHAIRMAN CHRISTIANSON: Hearing none,
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     we'll open the floor now to Council Chairs.
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10
                     Dan
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12
                     MS. PERRY: Hello. Hello, Member --
13
     oh, sorry, go ahead. This is DeAnna with the Southeast
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     Regional Advisory Council, did you want me to go next?
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                     CHAIRMAN CHRISTIANSON: We had Dan and
17
     then you'll be next.
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19
                     MS. PERRY: Oh, okay, thanks.
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21
                     CHAIRMAN CHRISTIANSON:
                                            Thank you.
22
     Thank you for calling in, appreciate you calling.
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24
                     MR. DUNAWAY: Thank you, Mr. Chair.
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     Dan Dunaway, Bristol Bay Vice Chair. It's interesting
26
     to hear the Lake Clark comments, we didn't hear those
27
     in February when we had our winter RAC meeting that I
28
     recall. I don't have the vote in front of me, but I
29
    believe we unanimously supported this proposal.
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31
                     I'll add a little personal knowledge.
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     I know of a guide in the Dillingham area who has sold
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     one or two hides, my impression is the market for these
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    hides is pretty limited, especially on a whole hide
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    basis and it's difficult, I think, in fact, to sell
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           There are some roadblocks later down the road
37
     for secondary sale. I think there wouldn't be for
38
    handicrafts. So keep that in mind. I think the
39
     concerns for incentivizing it are -- I haven't seen it
40
     happen in our area.
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42
                     I wanted to also make you aware of in
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     the next round of wildlife proposals, the Bristol Bay
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     RAC has two proposals -- what's the numbers here, WP26-
     38, which actually I wrote to go to a two bear brown
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    bear bag limit to correspond -- for Game Unit 17, to
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     correspond with the same rule for the State regulation.
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     It makes it a lot easier for folks out on the
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     countryside to go, what boundary am I on and so on.
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And then WP26-39 would be to modify the seasons to a year-round brown bear season which, again, the State just adopted that in January. The main impetus there for the State was to improve reporting, especially what used to be called a DLP shooting, defense of life and property, the current biologist was aware that we probably had a number of shootings that went unreported, partly if you're in the middle of setnet season, you whack a bear that's messing with your gear or whatever, you don't have time to be filling out papers and this way they have a lot more time to get the bear sealed, so hoping to get better biological harvest data. And then in Game Unit 17 we generally, I think, Frank would probably back me up but we feel like there's an awful lot of brown bears and they're hard on our moose and caribou and we, both, the RAC and the Advisory Committee for the area have strongly supported the bear reduction program. And I think that's also indicated we have far more bears than we ever dreamed of in the area.

So I'm just hoping those will give you some background perspective for the Bristol Bay. I'm speaking mostly for Nushagak but I hear a fair amount of concern about the abundance of bears in the Naknek, King Salmon, Lake Iliamna area, many of my friends —— I'm in close contact with several folks in the Lake Iliamna area and when the bear removal program first got started I was getting hammered with, why isn't it over here too, so if that's helpful. I hope that is helpful.

Thank you.

 CHAIRMAN CHRISTIANSON: Thank you, Dan, appreciate that. And then I did get a list here so I'll apologize if I gave somebody the wrong impression, but we'll go down the order here. So at this time we'll give Southeast RAC Chair an opportunity, if they're online.

 $\ensuremath{\mathsf{MS.}}$  LEONETTI: Or DeAnna, if she wants to speak.

CHAIRMAN CHRISTIANSON: And, DeAnna, you have the floor now.

MS. PERRY: Hi mem -- thank you, Tony.

0151 1 CHAIRMAN CHRISTIANSON: Yes, thank you. 2 3 MS. PERRY: Mr. Chair. Hello, members 4 of the Board, my name is DeAnna Perry, I'm the 5 Coordinator for the Southeast Alaska Subsistence Regional Advisory Council. Our Chair, Don Hernandez, 6 7 does send his regrets that he was unable to attend the Board's work session this wee but I'm happy to provide 8 9 the Council's latest recommendation on this proposal. 10 11 In its winter meeting this past March, 12 the Southeast Regional Advisory Council voted to 13 support WP24-01 as modified by Office of Subsistence 14 Management. The Council noted that brown bears are not 15 a conservation concern in Southeast Alaska and felt that Federal regulations protect brown bears from over 16 17 harvest. They believed, partly based on public 18 testimony at that meeting, that there was substantial 19 evidence that people do need to be able to sell these 20 hides to provide raw materials for skin sewers to make 21 handicrafts and to continue their culture. 22 23 This concludes the most recent 24 recommendation and justification on WP24-01 by the 25 Southeast RAC. 26 27 Thank you. 28 29 CHAIRMAN CHRISTIANSON: Thank you, 30 DeAnna. Any questions from the Board. 31 32 (No comments) 33 34 CHAIRMAN CHRISTIANSON: Hearing none, 35 next we'll call on Southcentral. 36 37 MS. MCDAVID: Good afternoon, Mr. Chair. For the record this is Brook McDavid, I'm the 38 39 Council Coordinator for Eastern Interior and YKDelta 40 RACs and I'll be helping present the recommendations on 41 behalf of the Chairs that were not able to make it 42 today. 43 44 So Southcentral Council supported 45 Proposal WP24-01 as modified by OSM. The Council said 46 that allowing the sale of brown bear hides is 47 beneficial to subsistence users and is already allowed 48 in some areas of Alaska. The sale of hides is likely 49 to occur at a low level because of low demand. The

Council is aware of cultural sensitivities in some areas of their region to the harvest and use of brown bears and their parts, which may come up at the Federal Subsistence Board meeting.

And that concludes the Southcentral recommendation, thank you.

CHAIRMAN CHRISTIANSON: Next is Eastern Interior -- oh, Kodiak Aleutian, sorry, I thought she said she was doing two. Thank you. Rebecca, you have the floor.

MS. SKINNER: Thank you. Rebecca Skinner from Kodiak/Aleutians RAC. So the KRAC originally, with the original proposal, we supported it with modifications that would allow the sale of brown bear hides that were taken in Kodiak so basically not just limited to areas where you can harvest at least two bears. In Kodiak, the way the subsistence harvest is set up, the entire area, we can only take 13 bears total because there are so many bears per community and there's nowhere near that many subsistence bears taken. I think the most we've had is three and it's usually much less than that. So originally the RAC did support wanting the ability to sell bear hides with -- but not going down the road of only allowing that in areas where there was unlimited bear harvest potential because Kodiak would be excluded.

When the RAC voted on this proposal with OSM changes at our February meeting, you can see in our report that it was a tie vote so the RAC did not end up voting to support OSM's proposal. I'm happy to take questions, I guess I'll try to give a little bit of context from being in the meeting.

There were concerns voiced by some RAC members that in the past, so I think this must have come up before 10 or 20 years ago, so in the past the RAC had not supported selling bear hides because the subsistence users didn't support doing that. When we voted on this in February, nobody came forward with those concerns and the people sitting around the table who actually use subsistence bear — so they either do subsistence bear hunts, or they use the bear, the hides or the fur to make handicrafts, they all supported the ability to sell the bear hide. So at the meeting we had we did not hear concerns from subsistence users

about not wanting to be able to sell the hides but it was referenced that in the past that had been a concern. So I think it seemed like that was a big, I guess I would say, source of discrepancy, and then, you know, our region as I said is very, very spread out and I think people out on the Chain, we had people in the meeting say we don't know anything about Kodiak bears, we don't want to vote on this, so I mean there was acknowledgement that people that don't live in Kodiak didn't have the same familiarity because they're -- you know, I think we all try to become familiar with our area but when you have a very geographically spread out area it's challenging.

So I'm happy to answer questions, but I guess the bottom line is we did support this in the past and then the last vote we didn't support it so that's what I've got, thanks.

MR. CHEN: Mr. Chair.

CHAIRMAN CHRISTIANSON: Glenn.

MR. CHEN: Thank you, Mr. Chair. Question for you, Ms. Skinner. So the OSM analysis reflects that you opposed the proposal although you provided details saying that it was a tie vote that caused it to fail, correct, and then you also — there's also — the analysis also mentions that your Council had reservations about this not being a traditional practice as being the reason for opposing, so is your information — I'm trying to reconcile the information you just provided with what's in the book.

MS. SKINNER: Yeah, so before the meeting started I did go back and look at the transcripts and there was a motion to support the proposal and it failed on a five/five vote so that's where I'm getting my conclusion that it was a tie vote and it didn't pass. There was no vote to oppose it, there was a vote to support it that failed.

The question about, I guess, the traditional values around being able to sell the bear hide, that's what I was trying to speak to. So I think that around the table there were non -- you know, non-

users of subsistence bears that articulated that in the past they had heard concerns from subsistence bear users that those people, in the past, disagreed with selling the hides but when we voted on this in February, the people around the table who actually do subsistence bear hunting and use subsistence bear parts, that was not what they said, what they said was they would very much appreciate the ability to fully utilize all parts of the bear and that being able to sell the hide would allow better utilization because --partly because subsistence hunting and fishing is expensive, especially bear hunting, and I think in the report there was a reference to profiting off of subsistence bear, you know, being able to sell the parts. I don't -- my impression is people aren't thinking about profiting, they're thinking about -- not even breaking even, but just being able to help support their ability to do the subsistence because of the cost of fuel or if you have to get a plane out to a site it's very expensive.

So I don't -- I hope that answered your

MR. CHEN: A follow up, Mr. Chair, if I

may.

question.

CHAIRMAN CHRISTIANSON: Yes.

MR. CHEN: So you did mention that five of your Council members voted in opposition of this, did they articulate any reason why they were voting no?

MS. SKINNER: Yeah, the -- again, from scanning through the minutes a few minutes ago, the primary reasons -- where somebody articulated a reason for voting no the primary reason was that in the past they had heard from subsistence people that -- people that they knew that either engaged in subsistence bear hunting or were from the villages, disagreed with the thought of selling the bear hide. So that was the biggest reason given. I don't think that the issue of conservation concerns or incentivizing more bear hunts came up. Again, with Kodiak there's a cap, you can only take 13 subsistence bears so I think everybody recognized that that provides a very clear line that would not be exceeded.

MR. CHEN: Thank you very much.

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0155
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                     MR. PENDERGAST: Thank you, Mr. Chair.
     Just a procedural question. It sounds like it's
 2
     assumed and understood, but a tie vote in the RAC
 4
    process equates to opposition?
 5
 6
                     MS. LAVINE: Motion fails.
 7
 8
                     MR. PENDERGAST: Motion fails, okay,
 9
     thank you.
10
11
                     MR. BROWER: Mr. Chair.
12
13
                     CHAIRMAN CHRISTIANSON: Charlie.
14
15
                     MR. BROWER: Same question. If it was
16
     a tie, the action on that just died, there's no
17
     opposition, nothing, it just faded away so there was
18
     really no action taken is my understanding. If there's
19
     a tie vote, the motion just died and faded away so
20
     there was no action taken but for some reason they put
21
     oppose here so.
22
23
                     MS. BOARIO: Uh-huh, that's what I was
24
     going to ask, it says opposed.
25
26
                     MR. BROWER: Yeah, and it's conflicting
27
     to when you have a tie vote. Robert's Rules of order,
28
     it just dies and fades away unless someone else makes
29
     another motion.
30
31
                     Thank you.
32
33
                     CHAIRMAN CHRISTIANSON: So that might
34
     just be something that clarifies the record here?
35
36
                     MS. LEONETTI: Robbin, do you have an
37
     answer?
38
                     MS. LAVINE: Good afternoon, Mr. Chair.
39
40
    Members of the Council. Robbin LaVine. At the meeting
41
    there was a motion to support as modified and that
42
    motion failed and there was no further motion made.
43
    There was not a motion made to oppose it but the motion
44
    to support failed.
45
46
                     Thank you.
47
48
                     CHAIRMAN CHRISTIANSON:
                                             So I guess
49
     that's why it's important here that we have Regional
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Advisory Council Chairs that sit here and the ones that take it to heart are here face to face or calling in and they're articulating the point of view and interest beyond that point in the meeting they did have with the interested parties who showed up, was that they support the proposal and would like us to make it concurrent to the rest of the reg so that they could partake in a statewide regulation we're trying to set here and not put a carve out, I remember that's part of it. So I'm just sticking to my own flavor so I really appreciate Rebecca being able to put that on the record here and articulate it here because things change from like before to now and what not and so I guess we're building that record right now and so I'm glad that we're taking that opportunity to ask good questions and tease it out and correct some procedural things as the process unfolds.

So any other questions for Rebecca -- go ahead, Greq.

MR. RISDAHL: Mr. Chair. Rebecca, I should know the answer to this question but I don't so I'm going to ask. Is there a Federal brown bear season in Unit 9 on the Peninsula? Like I know in Cold Bay that you can get State permits, registration permits over the counter and they have a year-round village season, so are those bears, would they become available — I mean there'd have to be a Federal season, basically?

Mr. Chair

MS. SKINNER: Yeah, this is Rebecca Skinner. I'm going to have to phone a friend on that one.

MS. GREDIAGIN: Lisa Grediagin for the record. So the Federal regulations for Unit 9 brown bear are in Units 9A and 9D, there is no Federal open season. But in the remainder of Unit 9, so Unit 9B, 9C, 9E there is a Federal brown bear season. Do you want more details?

MR. RISDAHL: Do you have the map handy? Thank you.

MS. GREDIAGIN: The map of Unit 9?

0157 1 MR. RISDAHL: Yes. 2 3 MR. WOODS: Mr. Chair. 4 5 CHAIRMAN CHRISTIANSON: Go ahead, 6 Frank, you have the floor for a second. 7 8 MR. WOODS: I'd like to commend Rebecca 9 and the Kodiak RAC that they include the cultural 10 aspect of this, you know, because it's important when 11 the villages -- you know in our area every village has 12 a bear problem and my grandmother said that my aunt --13 we used to -- we're part of the Bear Clan, and I'm 14 saying that because we would be in support of utilizing 15 what you just stated and the RAC addressed, is 16 utilization of the whole animal. In that process, you 17 know, it gets confusing because we have a mix of 18 cultures, we have a different value system, but 19 subsistence is based on a cash economy now, we have to 20 pay for gas, we have to have an outboard, we have to 21 have a snowmobile, we have to process, we have to get 22 access to it and we have to actually buy a license to 23 subsist, and that's -- we went over this over and over 24 and we have a two bear limit in Bristol Bay and I think 25 all of Bristol Bay now, except for 9, that's 26 commercial. 27 28 MR. DUNAWAY: Unit 17. 29 30 MR. WOODS: 17 is two bear limit. And 31 then we have Federal subsistence bears that get taken 32 at the Togiak Refuge. So great discussion, I think 33 it's well vetted, so thank you. 34 35 CHAIRMAN CHRISTIANSON: Any more 36 further discussion, questions on this one. 37 38 (No comments) 39 40 CHAIRMAN CHRISTIANSON: We'll move on 41 to Western Interior, thank you Rebecca. 42 43 MS. CLEVELAND: Hi, Jackie Cleveland, 44 YKRAC. If I'm loud enough I'll start by during our winter 2025 meeting in Bethel, our RAC supported WP24-45 46 01 as modified by OSM. And we thought it would better 47 align Federal and State regulations across the Delta 48 and making it simpler and easier for users who hunt 49 both on Federal and State managed lands. And it would

create more opportunity for Federally-qualified subsistence users. There was discussion about whether it was culturally appropriate to sell them or not but in the end we did decide that individual hunters could make that determination. We did, however, though, in 2023, fall of 2023, oppose it when we first voted on it. I guess we found it difficult to -- like it's already difficult to obtain an accurate population of the brown bear in our area and also we thought it wasn't in our place to vote for other regions because we know of our region and what the brown bear meant to us, and even within our region it means something different in different places. So, yeah, so those were our reasons we opposed it at first and then when we met again we decided to support it after more discussion. Doi. 

CHAIRMAN CHRISTIANSON: Thank you, Jacqueline. Any questions for YK from the Board.

(No comments)

 $\label{lem:chairman christianson: Appreciate it.} \\ \text{Next we have Western Interior.}$ 

MS. MCDAVID: Thank you, Mr. Chair. This is Brooke McDavid, again, for the record. The Western Interior supported -- or Western Interior Council supported the proposal as modified by OSM. They noted that brown bear hides must be sealed before they can be sold so harvest is tracked. The harvest of brown bears is not constraining brown bear populations. If harvest rises above harvestable surplus, regulation changes can reduce the legal harvest of brown bears in a hunt area. Only Federally-qualified subsistence users will be eligible, a smaller number of hunters then is eligible to harvest brown bears in general.

Thank you, Mr. Chair.

48 CHAIRMAN CHRISTIANSON: Any questions 49 from the Board.

0159	9	
1	(No comments)	
2	CHAIRMAN CHRISTIANSON: Frank.	
4	CHAIRMAN CHRISTIANSON: FIGHK.	
5	MR. WOODS: So how did you come up	with
6	the harvestable numbers and then I'm teasing.	WICH
7		
8	(Laughter)	
9		
10	MR. WOODS: Because we have a hard	l time
11	we have more brown bears in the Bristol Bay reg	
12	than we have people. We have a hard time feeding	
13	residents off of that land that we manage let alon	ie
14	bears. But I really commend the State of doing	1
15 16	accurate surveys and then they coordinate with Tog	
17	Refuge and it's really a good coordination between biology and the management to address the survey	title
18	concerns. And the information that was presented	
19	I'm going to concur with Dan, that in both arenas,	
20	think we asked, Togiak Refuge and ADF&G, to bring	
21	those surveys and that information because that	
22	information becomes real important to make these k	ind
23	of decisions.	
24		_
25	So thank you for your addressing t	he
26 27	harvest levels and population.	
28	CHAIRMAN CHRISTIANSON: Thank you.	Δητ
29	further questions.	2111 y
30	raremor quescrons.	
31	(No comments)	
32		
33	CHAIRMAN CHRISTIANSON: Seward	
34	Peninsula.	
35		
36	MS. MCDAVID: Thank you, Mr. Chair	
37	Seward Peninsula Council also supported WP24-01 as	
38 39	modified by OSM. The Council stated that the sale brown bear hides harvested for personal use is	OI
40	beneficial for subsistence users. The Council als	
41	noted that the proposal with the revised OSM	
42	modification, if adopted, is likely to create conf	usion
43	for the residents of Unit 22C. The unit is	
44	predominately State managed lands with a one bear	
45	harvest limit.	
46		
47	Mr. Chair	
48	CW1 TDW1W CW1 = CT - CT	_
49	CHAIRMAN CHRISTIANSON: Thank you.	Any
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0160
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    questions.
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 3
                     (No comments)
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 5
                     CHAIRMAN CHRISTIANSON: Northwest
 6
    Arctic.
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 8
                     MS. MCDAVID: Northwest Arctic
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     supported WP24-01 as modified by OSM. The Council
10
     expressed support for allowing hunters to utilize and
11
     sell more parts of the brown bear. The proposal gives
12
     hunters the option to sell the bear hide with or
13
     without claws helping them sustain their subsistence
14
     lifestyle by providing additional income for essentials
15
     like fuel, food and hunting activities.
16
17
                     Thank you.
18
19
                     CHAIRMAN CHRISTIANSON: Thank you. Any
20
     questions from the Board.
21
22
                     (No comments)
23
24
                     CHAIRMAN CHRISTIANSON: Next, Eastern
25
     Interior.
26
27
                     MS. MCDAVID: The Eastern Interior
28
     Council supported the proposal as modified by OSM.
29
    Council noted that allowing the sale of brown bear
30
    hides would not result in conservation concern because
31
     it would only apply to Federally-qualified subsistence
32
     user and the salvage of meat would remain a
33
     requirement. Brown bear are not widely targeted for
34
     subsistence food in the region but due to increasing
35
     food security issues from declines in other more widely
36
    more targeted species, like caribou and salmon, their
37
    importance for subsistence will likely continue to
38
     increase. Allowing the sale of brown bear hides would
39
    help Federally-qualified subsistence users obtain some
40
     additional value added benefits from their subsistence
41
    harvest. However, the Council noted the importance of
42
     tracking brown bear harvest and hide sales particularly
43
     in more easily accessible units to ensure no negative
44
     impacts. They also noted the need to prioritize bear
45
     population surveys since there are significant data
46
     gaps in many areas.
47
48
                     Lastly, the Eastern Interior Council
49
     thought that this proposal would best be dealt on a
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0161	
1	region by region basis, rather than statewide.
2	
3	Thank you.
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5	CHAIRMAN CHRISTIANSON: Thank you,
6	Brooke. Any questions for Eastern Interior.
7	(n-
8	(No comments)
9	CULTINAL CULTUTANICON VI '
10	CHAIRMAN CHRISTIANSON: Hearing and
11 12	seeing none we'll move on to North Slope.
	MC MCDAVID. Thoule wou Mrs Choire
13 14	MS. MCDAVID: Thank you, Mr. Chair. And this is the last Council recommendation for this
15	
16	proposal.
17	North Slope supported WP24-01 as
18	modified by OSM. The Council said that brown bears are
19	abundant in the region. They support the proposal as
20	modified but also noted that the permitting and sealing
21	requirements to sell brown bears are burdensome to
22	subsistence users.
23	
24	Thank you.
25	
26	CHAIRMAN CHRISTIANSON: Thank you,
27	Brooke. Any questions.
28	* *
29	(No comments)
30	
31	CHAIRMAN CHRISTIANSON: Appreciate the
32	presentations from the Regional Advisory Councils, we
33	value their input in our decisionmaking process. Next
34	is Mr. Mulligan from the Department of Fish and Game.
35	
36	You're coming in looking good partner -
37	multiple comments)
38	
39	MR. MULLIGAN: Flattery will get you
40	nowhere Mr. Chair. Flattery will get you nowhere.
41	
42	(Laughter)
43	
44	MR. MULLIGAN: But maybe snacks will.
45	(T   -     -     -     -     -     -     -     -   -   -         -     -     -     -   -     -
46	(Laughter)
47	MD DINAMAY, D
48	MR. DUNAWAY: Bear jerky.
49 50	

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0162
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                     MR. MULLIGAN: Rendered bear fat is
 2
     really good too.
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 4
                     (Laughter)
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 6
                     MR. MULLIGAN: With the levity aside,
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     for the record my name is Ben Mulligan, Deputy
     Commissioner for the Alaska Department of Fish and
 9
     Game. As I think most Board members are aware and even
     the new ones, just through the packet, we originally
10
11
     opposed WP24-01 preferring that if the Federal
12
     Subsistence Board was going to pass anything that it
13
     align with State regulations. Later on, per the
14
     direction of the Board, when OSM reached out to us,
15
     after talking with DWC leadership we knew that we were
16
     going to be unable to take on any additional burden
17
     that, you know, as of that moment having to seal and
18
     differentiate between Federally-qualified and non-
19
     Federally-qualified users would do and I think that's
20
     why you have gone down the Federal permit route.
21
22
                     So I guess at the end of the day we'd
23
     prefer for you to align but since you've taken us
24
     basically out of this then we can step aside.
25
26
                     Thank you.
27
28
                     CHAIRMAN CHRISTIANSON: Thank you, Ben.
29
     Anybody.
              Rhonda.
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31
                     MS. PITKA: So does that mean you're
32
     neutral?
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34
                     MR. MULLIGAN: As amended, yes.
35
     truly have no part to play in this I will say neutral.
36
37
                     MS. PITKA: Okay, so as modified by OSM
38
     you're neutral?
39
40
                     MR. MULLIGAN: Yes.
41
42
                     MS. PITKA: Thank you for the
43
     clarification, I just wanted to make sure it was clear
44
     on the record.
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                     CHAIRMAN CHRISTIANSON:
                                             I try.
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48
                     (Laughter)
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0163
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                     CHAIRMAN CHRISTIANSON: Any other
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    questions from the Council, yes, Kevin.
                    MR. PENDERGAST: Thank you, Mr. Chair.
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 5
    Ben, I'm just -- I want to make sure I understand being
 6
     relatively new to this issue, what does it mean to say
 7
     that Fish and Game is out of it?
 8
 9
                     MR. MULLIGAN: So by the OSM, and
10
    someone from OSM or ISC can correct me, with the
11
    development of a Federal permit that means that the
12
     State is no longer in a position of having to carry out
13
     regulations, Federal regulations. That was going to be
14
    our big hangup because we do not want to put our
15
     sealing officers in a position of having to
16
    differentiate between Federally -- folks hunting under
17
    the Federal system and folks hunting under the State
18
    system. So when I say we're out of it, it means that
19
    we're no longer impacted. So I mean I'll say for the
20
    record it is neutral, but as always we'd much prefer
21
    the Board to align regulations -- I mean that's your
22
    prerogative but you've taken us out of the equation,
23
    you have removed what we have said was our main concern
24
     so I mean it's completely up to you now.
25
26
                     CHAIRMAN CHRISTIANSON: I quess one
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    question before I turn it to Frank is, do we have
28
     sealers?
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                     MR. BROWER: Mr. Chair.
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                     CHAIRMAN CHRISTIANSON: Uh, let me just
33
    ask....
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35
                     MR. BROWER: Just a concern.
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37
                     CHAIRMAN CHRISTIANSON: Oh.
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39
                     MR. BROWER: You're still following
40
     your guidelines with claws attached and the Federal --
41
    with or without the claws; is that right?
42
43
                     MR. MULLIGAN: Are you asking the
44
     Federal system or the State system?
45
46
                     MR. BROWER: No, the State.
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                     MR. MULLIGAN: I can't answer that for
49
     you Mr. Brower. Then -- so if this -- and that's the
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 thing is that you've -- for the record, then someone needs to get up here and say it, because right now we will not be carrying that out because we're not going to have our sealers differentiate between the two. So if, for the record, someone can state that those folks, under the Federal Subsistence Program will need to come in to State sealers we will not be carrying out those seals.

CHAIRMAN CHRISTIANSON: Yep, and that's what I was asking, do we have sealers that -- so how's that -- how are we going to implement a regulation that we're going to impose something that they don't have a place to go, outlet it to, so that was my concern, that's what I was trying to get on the record here, was.....

MR. MULLIGAN: And, Mr. Chair....

CHAIRMAN CHRISTIANSON: Yes.

MR. MULLIGAN: .....OSM was well aware of that ahead of time before we hit this meeting.

MR. RISDAHL: Mr. Chair. I do know that some of us have sealed brown bears, but we're using the State's, right, as the Refuge Manager at Izembek, I sealed a lot of bears but they were harvested under the State system. I'm not sure how that relates -- you know, how -- that apparently others can seal permit -- seal bears, but, thank you.

 $\label{eq:CHAIRMAN CHRISTIANSON: I'll go to you, then I have a question. \\$ 

MS. GREDIAGIN: Lisa Grediagin for the record. So bears harvested by the State subsistence registration permit are not required to be sealed unless they're removed from the unit and so if they are removed from the unit, or in this case, are intended to be sold they need to be sealed. However, a condition of the State subsistence permit is that at the time of sealing, the sealing officer retains the claws and the skin of the head. And so currently State and Federal regulations are aligned in this, however, the current OSM modification eliminates that requirement for the skin of the head and the claws to be retained at the time of sealing. And, again, this only applies to bears harvested by the State subsistence registration

permit and for the most part this is kind of a nonissue because that permit is so rarely used. You know in Unit 22 that permit has been used twice, or two bears have been harvested under that permit in the last 20 years. However, if it becomes an issue then we can have a proposal submitted to eliminate that State permit requirement and either require no permit or require a Federal permit. And so that's where I understand the State concern, that the sealing officer isn't going to differentiate between a bear harvested under Federal regulations by a State permit versus a bear harvested under State regulations by a State permit. However, you know, we can always change Federal regulations to not require the State permit.

CHAIRMAN CHRISTIANSON: Basically what I'm teasing out, though, is what we're trying to do is to be able to sell it says they have to have it sealed so the whole pretext of this is to allow the sale of bear and if they can't go get it sealed then they can't sell the bear anywhere. So that's kind of the -- so unless we're ready to say as a Board, we're going to issue permits, and what Greg said, within the timeframe it takes to get this in we'll probably get some sealers ready in the areas most affected maybe? I don't know, I'm just thinking process-wise, right? I'm looking at my partners here, the land managers saying, okay, if this happens and it may be only two or one, you know, but if we put it in the regulation who's catching that burden. So I'm just putting it on the record.

Thank you.

(Pause)

CHAIRMAN CHRISTIANSON: At this time, if nobody doesn't mind, what I'm going to do is take a five to 10 for conference, take a break, let's have a little shake it off, thank you.

(Off record)

(On record)

45 CHAIRMAN CHRISTIANSON: Welcome back, 46 this is us, hello, hello.

(Pause)

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0166
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                     CHAIRMAN CHRISTIANSON: We just took a
    little five minute break so we can kind of confer about
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    the direction the Board wants to go so what I think we
    need to do is have a little bit of discussion on the
 5
     record so that we can figure out what direction the
 6
    Board is going to go at this time.
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 8
                     MS. LEONETTI: We also still have.....
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10
                     CHAIRMAN CHRISTIANSON: Yes, we still
11
    have a few things on here but I'm just saying we've
12
     heard the State and any other questions at this time.
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14
                     (No comments)
15
16
                     CHAIRMAN CHRISTIANSON: We'll move on
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     to the next part so we can open up the floor for the
18
     record discussion. Any questions here right now so I
19
     can move on to the others.
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21
                     MS. LEONETTI: Yes, Sara does.
22
23
                     CHAIRMAN CHRISTIANSON:
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25
                     MS. BOARIO: Mr. Mulligan, would you
26
    mind explaining on the record just like the practical
27
     implications on the ground for the sealer. You alluded
28
     to it earlier, I think it's really helpful to
29
     understand. Sorry, if I'm not speaking close enough.
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31
                     MR. MULLIGAN: Through the Chair.
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    Member Boario. So in the instance where you have an
33
     individual hunting under Federal regulations but you
34
     guys are utilizing our State subsistence permit with
35
     the different requirement for head and claws it would
36
    then force our sealers then to have to try to
37
    differentiate between the two and, again, on the record
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     and before this and now, we're not going to require our
39
     sealers to do so. That is a very hard thing to do and
     during my tenure I don't see it being done amongst the
40
41
     Federal agencies right now, so if no one else is doing
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     it, I can't expect our folks to do it as well.
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44
                     CHAIRMAN CHRISTIANSON:
                                             Thank you for
45
     that Ben. Any other questions from the Board.
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47
                     (No comments)
48
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                     CHAIRMAN CHRISTIANSON: Okay, we'll
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move on to InterAgency Staff Committee recommendation.

MS. LAVINE: Thank you. Mr. Board [sic]. For the record, Robbin LaVine. The InterAgency Staff Committee reviewed the analysis and provided the following comments as is our practice when there are Council recommendations.

The revised OSM modification adds new information in response to the Board's requests following deferral at its February 2025 meeting. It limits sales to purchases for personal use only within the United States, thereby complying with the provisions of Convention on International Trade and Endangered Species of Wild Fauna and Flora or CITES. Further, the OSM modification allows a hide to be sold with or without claws attached. This will allow a subsistence user to remove a claw or claws for a handicraft and then sell the hide separately. Current Federal subsistence edible meat salvage requirements will help protect brown bears from over harvest while allowing for the sale of the hide with an OSM customary trade permit.

The OSM modification also removes from Federal regulations the requirements in some areas of Alaska, that at the time of sealing, the Alaska Department of Fish and Game authorized sealing official must remove and retain skin of the head and front claws of the bear hide. Removing this clause from Federal regulation will align with current ADF&G general hunt regulation requirements for sealing of brown bear hides, however, it will then be out of alignment for Federally-qualified subsistence hunters who are utilizing a State subsistence registration permit for harvest of brown bear in Units 9B, 9E, 17, 18, 19A and 19B, 21D, 22, 23, 24, and 26A identified in Federal Subsistence Management regulations.

All 10 Regional Advisory Councils reviewed the revised proposal during their winter 2005 [sic] meetings with nine supporting the proposal as modified by OSM. The Kodiak/Aleutians Council opposed for reasons stated in the analysis, and as you just heard represented by the Chair. On statewide proposals such as this, the Board can choose to adopt regulations by region and recognition of each region's unique cultural traditions, local community feedback and recommendation by the Councils.

If adopted by the Board, the regulation will not be effective until the Office of Management and Budget approves the development of a new Federal permit allowing for the sale of brown bear hides under Federal regulations.

Thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Thank you, Robbin. Any questions from the Board for the ISC on the recommendation.

(No comments)

CHAIRMAN CHRISTIANSON: Hearing and seeing none, thank you, Robbin, for that.

Board deliberation and discussion right now, I mean it's usually on here where we just kind of kick it around a little bit before we open up the floor for a motion. I think there's a little bit of discussion here unless somebody magically has a thought here.

Frank.

MR. WOODS: For the record, Frank Woods, Public Member. I really enjoyed the State coming in and explaining the sealing requirements because that was the biggest, hottest issue for, at least, for a resident. You know this will clarify a whole bunch of issues, not just the sale of brown bears but then jurisdiction, right. Because I live in Togiak Refuge and there's Becharof and Lake Clark Park and Preserve in our area, and we work at aligning everything to make it easier for the subsistence user. There was a time when I went before the RAC and I brought eight permits, I remember coming here and explaining to this process how complicated it was to hunt and subsist on Federal and State land and dual management because I had eight permits for the same location. This will help, at least, the Federal side, you know, and thank you for clarifying the State is going to step down and I agree it's not your job to do our job, so what we are doing is setting precedent so we can allow subsistence users, not only to gain income but also utilization of a hide that normally just sits somewhere and I don't know what it looks like. I've shot one bear in my time and after skinning that one

bear I don't want to skin another bear and that's reality. Yep.

(Laughter)

MR. WOODS: Yep. Yep. So we're good, I really -- yeah, this is a process that's been years in the making. I remember going through this in probably '08, Dan, or earlier, yeah, so we're -- you know, we're years into it and a lot of people involved, a lot of information so thank you. And thanks, Ben.

CHAIRMAN CHRISTIANSON: Glen.

MR. CHEN: Thank you, Mr. Chair. Question for you, Mr. Mulligan. So we were wondering about what steps the State might do to prosecute someone, a Federal hunter who sells a hide without kind of meeting some of these requirements, would you have a sense of that?

 MR. MULLIGAN: Through the Chair.
Member Chen. No, I do not. You know the modification was presented to us on July 8th, I got time enough to talk to DWC, as you're probably aware we do not conduct enforcement and prosecution activities. Alaska Wildlife Troopers and the Department of Law carries that out and it would take me more time to see -- to give them a scenario in what they may or may not under the provisions that you are looking at right now.

MR. CHEN: Thank you, Mr. Mulligan.

CHAIRMAN CHRISTIANSON: Yeah, I guess -- Board Chair here -- was there somebody else here to recognize -- no, I'll recognize you Kevin.

MR. PENDERGAST: Thank you. So I just want to make sure I understand the Statewide system. For non-Federally-qualified users, they can harvest a brown bear in most units and bring it in, head and claws still attached, but the State collects head skin and claws and retains those; is that correct?

MR. MULLIGAN: No, it's a require -sorry, through the Chair. Member Pendergast. To
clarify, because earlier in the conversation -- we just
require that because we may need to take samples from
that, it's not a total confiscation or retention of

those materials, we just require -- same as is if you look at our book on Page 16, in some places we require proof of sex as well for said animal, so it's just we need that, some for data collection, some for just proof to prove the legality of the animal that was harvested.

MR. PENDERGAST: Follow up question. Thank you, that's helpful. So let me just kind of flip it around in my own mind to make sure I understand.

So the State's not particularly concerned whether the harvested hide is coming from State or Federal lands, the only thing preventing someone — the only thing preventing a Federally-qualified user from selling the hide is strictly our regulations, it's not — there's currently no misalignment with the State as far as how the hide is presented?

(Laughter)

 $$\operatorname{MR.}$  MULLIGAN: Give me a minute, that was pretty funny.

(Laughter)

CHAIRMAN CHRISTIANSON: We're not

29 aligned.

MR. MULLIGAN: Through the Chair.

Member Pendergast. No, there's not a conservation concern. As I think has been mentioned and is what we've realized, we don't think there'd be a huge up tick in harvest because of this. We don't see it right now, it just gives folks that opportunity and so, yes, the difference in what I guess you consider the rub is that differentiation where, again, we'd be looking at conflicting regs of what an individual would need to bring with them in order to seal that hide, that's where it really comes down to. If everything else was the same and you couldn't tell the difference between said Federally-qualified user and non-Federally-qualified user, I mean we wouldn't have an issue.

Now, with that said I'm going to go back to our original position. I feel it would be a lot easier, and it won't cover areas like for Kodiak Island, I don't think they'll ever go to a two bear

limit on Kodiak just given just everything that goes on for bear management and everything, but in a lot of places including, I think, the one from the original sponsor, you know, go to the Board of Game, get a two bear limit, that Board has been very friendly towards the harvest of bears and that would have solved the issue already.

### MR. PENDERGAST: Thank you.

CHAIRMAN CHRISTIANSON: So what I was suggesting, Christianson here, was, I didn't know if there was an agency here that, you know, seeing if we were going to enact something that would put the subsistence user out there, we don't want them to run into what we're talking about here which is there isn't a clear end to what it is we're proposing here and without a clear end I'm not clearly -- I'm clearly thinking there's either room for more discussion on this until we clarify how this looks, unless there was an agency that jumped up right now and said, we'll seal those bears or something around the table, I'm just saying, you know, but, anyway, all I'm saying is is without that I don't know how, you know, we would proceed if we're going to potentially even put one of our residents at risk of not meeting a requirement that may or may not put them at jeopardy with legal people, right, like that's not something I think this Board is looking at doing. Right now I'm not hearing, here's the plan if we got it out -- take the State, make it all Federal, make our whole permit, remove that it's still just going to create more of a complication that you hear the Board here not wanting to do, you know, out there on the landscape making it more complicated for the user, right. I mean I think our intent here is to not make it more complicated but also to provide that opportunity so they can do it and sell some of those parts that they feel usual and accustom to.

So speaking to the proposal for all the RACs here, that's their wish, is to make sure we can do this, which we've always done, and I know that's what they're listening to at the regional levels, this is our inherent right so let's bring it to there but I don't think right now I hear a clear articulated path forward to really move. That's my point of view right now unless somebody steps forward and clearly can do that, I would almost entertain.

Nobody wants to say it, I entertain a deferral.

MS. LAVINE: Hello, Mr. Chair. Members of the Board. This is Robbin. I just really quickly wanted to note that this is the opportunity for Board discussion with liaisons and so that means not just with the State liaison, Ben Mulligan, but also Council Chairs, if anyone has information or thoughts or suggestions to offer, the liaisons to the Board can all participate in the discussion.

### Thanks.

MR. RISDAHL: Okay, Mr. Chair, I have a thought but I've kind of thrown it out there already and it doesn't sound like it's going anywhere, but -because OSM did not consider it in their analysis, and that is it has to do with the sealing requirement to sell brown bears, that's a CITES requirement, right, in order to sell hides outside of the State, outside of the country. So what if we don't require brown bear hides to be sealed by the State? You get a permit through the Federal government and if we need to -there's a need to track, right, we need to know what's going on, the State's going to want to know what's going on but if they don't have to do the sealing and we have a permit, a Federal permit, we don't necessarily need to seal them, I think there are other ways we can track the harvest like we do for other species. So it's just a thought but it sounds like people are saying that's pushing it too far at this point. Because really I think -- I mean I know you don't even have to seal brown bear hides in a lot of the units under State regulations, right, it's not an absolute requirement. That locking tag is a CITES requirement for selling them, you know, across borders, International borders.

Anyway, it's just a thought. But, again, it will require more research and more -- first of all we need to find out if we can even get a Federal permit. I'm pretty sure that's a possibility because there are Federal permits for other species, walrus, for instance. But, anyway, thank you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Well, that's why I was hoping there'd be an agency here, you know, because we do walrus, we do sea otter, we do polar

bears, you know, they hunt whales, there's harvest out there, you have to seal your wolf, I mean it's a State deal but I mean it happens, it can't be something --well, I mean, not the Commissioner, I was looking at Charlie over there, not you.

#### (Laughter)

CHAIRMAN CHRISTIANSON: So just saying, you know, I think the power in the room to do it but, again, unless lips open.

MR. WOODS: I like the idea -- Frank for the record, Public Member, remove the sealing requirement wouldn't be a problem. You don't have to seal it unless you move it, right, and maybe there ought to be a -- we got two years, it's going to go into regulation, we got two years to figure out how to move it. Either the Park Service takes over or your office or U.S. Fish and Wildlife Service or OSM. There are tags we can -- I mean tags you can get and I'm speaking frankly.

MR. DUNAWAY: You always do.

#### (Laughter)

MR. WOODS: I agree.

# (Laughter)

MR. WOODS: It's going to be two years to figure out how to do this correctly with a tag if you move -- right now I could shoot a bear, don't have to tag it unless I actually have to transport, right, so -- and that takes either -- right now I'm going to pick on the State -- I know -- you have to go through the seal it, but if we come up with our own within the next two years on how to seal it, to move it, either sale or tan, right, because I mean you could sell a raw hide or you could sell a tanned hide, so I would -- I would not agree that we not take action today, I think we take action today and work out the details because there's no requirement to seal, right, if we remove the sealing requirement, we would add in there a provision in order to sell you'd -- and I'm thinking there's like four different offices, either -- like we assign each village -- for sea otter, we have taggers, for walrus we have taggers, for different agencies we have

taggers, we actually give permits out of the offices and I think those details can be worked. I mean we're talking a minimal amount of people, at least in our area.

So.

MR. BROWER: Ben, just a question. Anyone can apply to ADF&G for training for tagging; is that right?

MR. MULLIGAN: Through the Chair. Member Brower. I'm going to apologize. We've gone far down a road that the knowledge that I have stuffed into my brain for this one has run out. Anything that —the details that we're getting in now I'm reaching a level that I'm uncomfortable trying to answer on the fly, so I will apologize to you for that. But at this point in time until like I see something concrete I can run by my folks I can't make calls at the table.

MR. RISDAHL: Mr. Chair. So kind of going off of what Charlie and I have been talking about and what Frank was saying. So I've sealed walrus skulls too, tusks, right, people don't have to have a permit to get them, they just go get them, it's a regulation that says you can harvest them, you can pick them up on the beach. In fact, even if you're not a Federally-qualified subsistence user under the -- well, under the Federal Marine Mammal Protection Act you can pick them up, they just bring them in to the office and we tag them. There isn't a requirement for a permit, it's in law that you can harvest them. So we would get that harvest data, we have a regulation that says you can hunt them, and people when they shoot them, they bring them in and we tag them and that's what you got to get from OB, whatever it is, OMB. That's what you need to get is that permit, which is basically the tagging part of it, and if you shoot one and you go in there and get it tagged and you're done.

MR. ALBERG: Yeah, Mr. Chair. So I don't disagree, these are details that can be worked out. I guess my question for the body here is what is the benefit of voting on this today versus working out those details first because there are some logistics, there's probably some legal questions in there as to how this all would be rolled out. I tend to think deferring this is a better approach for now but -- and

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working through those details so it can be rolled out clean and ready to go but I don't -- I would appreciate anybody's comment on what is the driver for having to bring this across the line today?

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MS. GREDIAGIN: Thank you, Mr. Chair. Lisa Grediagin for the record. I just want to emphasize the issue with the current OSM modification is the use of the State subsistence permit, that requirement in Federal regulations. And so even if we eliminated some sealing requirement anyone that harvests bears under Federal regulations by that State subsistence permit has to follow the conditions of that permit. And so to me what I would really appreciate since, you know, well, if you guys defer it I'll probably be the one dealing with analyzing it and coming back to the Board in a year again with this, is, better direction on where to go with this. Because to me the simplest thing would be to submit another proposal to just eliminate the State subsistence permit in Federal hunts like across the board. Because that's the sticking point right now is that the State subsistence permit requires retention of the claws and skin of the head at the time of sealing. And, you know, even if we don't require sealing to sell the hide the users still have to comply with the conditions of that permit as required under Federal regulations. And so we could either go the route of just eliminating that State subsistence permit under all Federal regulations so that then they either revert to a Federal permit, or just kind of the State general hunt, which just a side note, all State general hunts require sealing. It's only the State subsistence hunts that do not require sealing unless the bear's going to leave from the unit.

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So that would be the -- you know, it sounds like the Board's going to defer this just because there is this unresolved issue with the requirements of the State subsistence permit, you know, retaining the claws and the skin of the head when it's sealed, so any direction from the Board would be greatly appreciated.

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Thank you.

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CHAIRMAN CHRISTIANSON: So Lisa, that's almost like two parts, too, right. It's like there's this part which is, you know, just two in 20 years that

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we're talking about, and then the 99.9 percent of the users are going to be required anyway even under this regulation. So I see what you're saying, as Staff too, there's a lot of time in analyzing. So I mean potentially if we did move forward we're talking about maybe a procedural part as we develop our permit for that if we do move forward, right? So like if we move forward, I get what you're saying, right, like, but to deal with the little nuance over here in the corner that's chirping at us, like two people in 20 years, so like, you know, to try to figure out like Frank's saying, you know, consider moving, like Rhonda's feeling, pushing, you know, move, that either we can do that like you're maybe hoping for, you know, with that, you know, because like I said I would hate to put our users at a disadvantage knowledge-wise, right.

MS. GREDIAGIN: Yeah, and I'll just also note, through the Chair, that even if the Board hypothetically approves this with the OSM modification today it's still not going to be implemented until we get OMB approval. So there could be, not a sunset, I guess I sunrise clause, that you're not going to implement this until we're able to address that State subsistence permit. Yeah, I guess I would defer, I don't know, solicit other Board members on your thoughts on kind of deferring it to kind of work out the details of that State subsistence permit, or to approve it with kind of that sunrise clause that you're not going to implement it until we figure that out.

MR. PENDERGAST: Thank you, Mr. Chair. Kevin Pendergast for the record. Well, I thought this was kind of straight forward walking in here but it's become a little more complex.

## (Laughter)

MR. PENDERGAST: But I wonder if it isn't actually a little more simple. So this started, what, two years ago with a single person, really, making a proposal in one unit and we've kind of, as we often do as the Federal government, we sort of expanded it into a much more complex process, but I'm just wondering if that proposal wasn't rooted in, hey, I can do this on State lands, I want to do the same thing over here on Federal lands. How do we get to that and why do we need the permits and the sealing and all the additional bureaucracy and process that goes

along with that when all they want to do is do the same thing they're doing on State land on Federal land?

MR. ALBERG: Mr. Chair. And just to add to your point, Kevin, that's the theme of one of the Executive Orders by the President, is to simplify and align.....

MR. PENDERGAST: Yeah.

MR. ALBERG: .....Federal and State of Alaska guidelines.

MR. PENDERGAST: And that's part of what's in my mind. What I feel like what we're doing here is just like diverging and creating a bureaucracy that -- and tell me if I'm wrong but it sounds like the reason we're doing this is because of CITES and International trade requirements, primarily, the whole permitting and everything, and you could address that by just saying you can't sell them Internationally unless you meet some requirements or something. But I just think.....

CHAIRMAN CHRISTIANSON: Go ahead, Lisa.

MS. GREDIAGIN: Lisa Grediagin for the record. So this proposal was originally submitted by a resident of McCarthy and so currently in Unit 11 under State regs it's a one bear harvest limit so in Unit 11 they can't sell bears under State or Federal regs, you know, State or Federal lands, and also if you harvest from the National Park you can't harvest anything on Park lands under State regulations so when this came before the Board in April 2024 the OSM modification was to align with the State regulations to just allow sales of brown bears from units with a two brown bear harvest limit and the Board, especially the Park Service was really sensitive to that not meeting the intent of the proponent who was coming from a one brown bear unit and a National Park, and they also expressed some concerns over the possibility that if we adopted it, to only be able to sell bears from a two brown bear harvest limit, that then we'd get proposals across the state to just increase the harvest limit to two brown bears in every single unit across the state, which they thought might be a conservation concern. And for the record there currently is a proposal to increase the Federal harvest limit in Unit 11 to two brown bears. And the State

continues to increase, you know, Unit 13, Unit 18, you know, were just recently increased, Unit 12.

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But to your point, I mean, that was the mind set of the Board at the time and so they wanted us to work to address the concerns of the proponent as well as most -- a lot of the Councils supported it as submitted, like they didn't want -- some Councils supported as modified by OSM, partly because they're like we have a two brown bear harvest limit in our region already anyway so we'd be able to sell under State and Federal regs and other Councils were sensitive that this wouldn't benefit us at all because we just have a one brown bear harvest limit.

And so then to be able to sell Internationally you need to get that permit to sell from the State and the State said we're not going to give Federal bears a permit to sell from units with a one brown bear harvest limit. They had agreed that if it was a one brown bear harvest limit under State regs and a two brown bear under Federal regs they would still give a permit to sell.

So that's what led us down this path of trying to follow the direction of the Board from April 2024 to meet, you know, the desires of the Councils and the proponent to allow sales across the state regardless of harvest limit under State regulations.

CHAIRMAN CHRISTIANSON: So that explanation helped me fall back to maybe, I think, Frank's suggestion of potentially moving forward today with what we have with the administrative instruction that as we proceed with the Federal process that there's still a program that has to be developed for that, right, with the understanding, OMB permitting has to happen, that we still need to figure out how we would permit or tag those bears, that there's these little hanging things out there but, you know, like we said we have a little time. But for the rest of the proposal I think it does our justice to our RACs if we do make that motion as well, you know, they all concurrently agree minus, you know, the one bear that doesn't meet, but 90 percent of our RACs have weighed in, which is hard to not listen to at this point because that's who we sit here as our constituents, are the ones that we work for, and, albeit it's a small percentage we might be able to work it around, but the

proposal itself still clearly states everybody participating and that still has to go through all of the State processes. So we'd be talking about over here and a potential opportunity and that timeframe to educate our Boards on what that looks like, you know, as far as we come into our fall cycle, hey, we got this to this point but we have these things that we're working out because of this potential conflict of the sealing.

That's just where I'm feeling we've kind of worked our way around to, if there's a different opinion.

Go ahead, Glenn.

MR. CHEN: Thank you, Mr. Chair. That is correct we have spent lots of time and energy getting to this point. We still have concerns, however, given that there's some very critical details that need to be worked out that a subsistence user might inadvertently try to harvest a bear, try to sell it in advance of these details worked out and therefore get cited. And the risk is maybe small but it is still there. So we would feel more comfortable with having all the details worked out first before approving the proposal.

Thank you.

CHAIRMAN CHRISTIANSON: Okay. I can see like I'm on Humpty Dumpty here, I sit on a wall, so you guys have to make us make a great fall.

(Laughter)

CHAIRMAN CHRISTIANSON: Charlie.

MR. BROWER: Mr. Chair. So your recommendation, or willing to defer until the next cycle or what, or until the ISC come up with some recommendation to the Staff for us to consider?

CHAIRMAN CHRISTIANSON: I think that's what we have here before us, I think Glenn's saying where his comfort level is, I hear other people kind of leaning in a direction here, I also feel pressure to move forward, so, Rhonda.

MS. PITKA: I was going to pressure you to move forward please.

## (Laughter)

MS. PITKA: No, I mean it's been two years. This came up two years ago, like literally what more information does anybody need to be comfortable, you have been thoroughly briefed by the ISC, there are hundreds of pages of documents that you can read, we have had briefings on this like four times. What more comfort level do we need to not make a decision?

CHAIRMAN CHRISTIANSON: Well, another suggestion is we could vote on it and then we know how everybody feels and then we can move forward based on the vote of this Board and that's always an option. We can put it on the Board, we can put it up, down, left, right and then we can make recommendations while the motion's on the table and then after that we can direct our Staff of which direction we go with that, so, that's all a third option here.

## Frank.

MR. WOODS: So, Mr. Chair, when I first got on the RAC and the RAC came up with proposals and with OSM's blessings, you pointed out something that 90 percent were in favor, that that direction needs to be followed by this Board. At least that was the recommendation when I was -- Molly gave me that recommendation, I was like -- I don't know if I was confused but I was happily elated that a recommendation from the public were getting heard at this level, so 90 percent of the RACs voted for this with exception of Kodiak and that exception fully vetted, I would move forward just the fact that we -- we've done our duty. I remember this whole issue coming before, not just the RACs but the ADF&G, the whole process on moving forward, that, I would love to see it move forward in one degree or another as written or as modified, so, thanks.

 MR. RISDAHL: Mr. Chair. I guess I would agree with that concept of moving forward but I think that adding the ISC contingency that it has to --before obviously the law would go into effect, regulation would go into effect, the background work would have to be done through OMB, otherwise, you know,

we're putting up a law that really may or may not be possible so it would be contingent on the response that we get from OMB.

Thank you.

MR. PENDERGAST: But I believe that would only be true if we decide that there's an additional permit required. This whole specter of OMB and Paperwork Reduction Act and that's strictly if we're going to issue or come up with basically a new permit, this customary trade permit. That doesn't exist right now, right, but there's nothing that says that that's required, that's just something we're coming up with as a means of tracking or CITES compliance.

CHAIRMAN CHRISTIANSON: Yeah, we got to be on the track, the harvest and the take and if we're going to be allowing the sale of it we should be recognizing that animal and have it on the record, hey, they took an animal, they reported it to the officer for permitting and that that animal now — that that person now has a sellable animal. So, you know, like that would be on the Federal government. That's what Ben's saying, it wouldn't be on the State anymore to meet that requirement. What that does to the user is the concern you hear coming from Glenn, you know, that we can put a small fraction of our users at some jeopardy there so I think that's what we're weighing here again. But that's all contingent on OMB permit.

MR. PENDERGAST: So just kind of a thought experiment here. So if we just move forward and approve the proposal as originally submitted, with no additional permit requirements, and it aligned with the State's regime, am I correct that nobody would be in jeopardy of violating State or Federal law at the user level. The user who submitted it, under the current regime, wouldn't enjoy the new flexibility because in his unit there's only one bear and that doesn't -- so that wouldn't work, so maybe he could approach the Board of Game or something, so that might be a regrettable outcome, but I just -- I guess I'm not understanding where the actual need is for a customary trade permit. It's a method of tracking, there must be other methods with less bureaucracy associated with them. So, you know, that's -- we could defer, we could go on the record and kind of vote or make amendments

and so forth, I kind of favor the latter, but to be honest, yeah, right now I just feel like we've created a lot of potential process and multiple years probably in the current environment of trying to get a new permit in place and things, and I just am not understanding the value of that for the user when we could simply align with the State system and let people do it on Federal lands the same way they do it on State lands.

MS. GREDIAGIN: Lisa Grediagin for the record. And the customary trade permit replaces the State's permit to sell and so the State -- to sell under the State regulations you need a permit to sell but since we're trying to find a way to allow the sale of brown bears anywhere in the state regardless of harvest limit, you know, we have to use that customary trade permit since we can't use the State's permit to sell. And just to note that, you know, the analyst who worked on this proposal for like the past two years recently retired but she worked very closely with Ken Lord on this conclusion and recommendation so it was pretty thoroughly vetted by the Solicitor and, you know, it would make me pretty uncomfortable to just say we don't need a permit because it's just extra requirements and then there's no way to track it when the State, you know, they track it through their permit to sell and so it's just a replacement of that.

MR. PENDERGAST: And just a follow up, and maybe that's a piece I'm not appreciating is what the State permit to sell piece, we would need -- we wouldn't be able to take advantage of that process or?

 $$\operatorname{MR.}$  MULLIGAN: So, again, you guys have gone down the rabbit hole so far that I am uncomfortable making a decision at the table at this time.

MR. PENDERGAST: Hum.

MR. MULLIGAN: If you guys want to bring something to me or you guys can go -- I mean it's your regulatory body, you can make your decisions and we will react accordingly but at this time I'm -- it's too far down the rabbit hole.

 $$\operatorname{MS.}$  SKINNER: Thanks. Rebecca Skinner. So I don't know all of the logistical details of what

is required for the sealing and what not, what I am getting out of this is if the Board decided to just default to the State system, the users in Kodiak would definitely not be able to sell a bear hide probably ever because as Mr. Mulligan already said the Board of Game is probably never going to allow a two bear harvest limit in Kodiak under the State system. So for us it makes a tremendous difference whether you're defaulting to the State system or if on the Federal side there's another option, which is what I understood this to be.

I do tend to agree that tracking is really important, tracking harvest, tracking if people put in for a permit, so they're interested in harvesting and then the actual harvest so you know how much was taken, it becomes very relevant in the resource world. I know some subsistence users, they don't like to report, they're offended at having to report data, I get that, but having the data and being able to show that there is harvest and interest is really important, so if we're not using the State system where that permit and that tracking is happening, I understand why there's a desire and I do think a need to have that on the Federal side.

It also seems like there are a lot of logistical questions. Like sealing, who can do sealing, who's willing to do sealing, what does it take to be a sealer, that nobody at the table can answer. I tend toward approve this today and then you have a deadline to figure out the answers. My concern is that if it doesn't get approved today it's already been two years and then it's another two years and then thinking about administrative changes at the State and at the Federal government, because that's putting you probably into new administrations and it just -- I -if this is something that's important, which the RACs have said this is important and they want it, I don't see that delaying is the best way to accomplish it. But, I agree, there's a lot of details that people at the table just don't have.

Thanks.

CHAIRMAN CHRISTIANSON: Charlie.

MR. BROWER: Thank you, Mr. Chair. At this time I would make a motion to approve Wildlife

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     Proposal WP24-01 with modification by OMC -- OSM.
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                     MR. WOODS: Second that motion.
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                     CHAIRMAN CHRISTIANSON: Charlie made a
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     motion to accept, there's been a second on the floor.
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     The floor is open for more discussion. Come on, go for
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     it.
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                     MS. BOARIO: Can I ask a question of
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     the Solicitor during this time, during discussion?
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                     CHAIRMAN CHRISTIANSON: This would be
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     the time, we're under discussion.
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                     MS. BOARIO: Okay. Lisa, what is the
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     mechanism in place to, I'm trying to think, to prevent
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     the resale into International markets, right, like so
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     in my mind, the back up safeguard of the State sealing
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     is, you know, if you think this is hard for us to
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     figure out right now and then you add in CITES to
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     people who are like oh I'm just trying to sell my hide
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     and make a living and continue and the two parties
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     aren't really aware of CITES and there's unintentional
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     sale -- or I mean intentionally selling but not aware
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     of CITES, if it's not -- I don't know, I'm just trying
27
     to figure out like is there an unintentional aspect to
28
     the CITES component here?
29
30
                     MS. DOEHL:
                                 Through the Chair.
31
    Member Boario. I'm not an expert on CITES first of
32
     all. Second of all, this proposal, which would be
33
     codified in regulation informs people that the sale
34
     would only be domestic and that I believe it says that
35
     the International sale -- well it says -- I thought
36
     somewhere it says -- okay, under the customary trade
37
     permit, it says, providing the hide is purchased within
38
     the United States for personal use and not to be
39
     resold. So presumably the person, at least the person
40
     who harvested the bear and sells it is supposedly aware
    by these regulations of that requirement. As far as
41
42
     anyone who buys it and tries to resell it in
43
    International trade, I mean they have an obligation to
44
    be aware of CITES just like we're all supposed to be
     aware of all laws of the United States but whether
45
46
     that's realistic or not, I'll leave it, I can't say.
47
     But does that answer your question.
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MS. BOARIO: Yes, enough.

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0185

1 MS. DOEHL: Okay.
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3 MR. CHEN: Mr. Chair.
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5 CHAIRMAN CHRISTIANSON: Yes, Glenn.
6
7 MR. CHEN: Thank you, Mr. Chair. W

MR. CHEN: Thank you, Mr. Chair. We still are uncomfortable with adopting this regulation as it's now. There are a lot of details that still need to be worked out. These could present vulnerabilities to subsistence users should they inadvertently try to harvest a bear prior to all these details being worked out and so forth. We do have a wildlife meeting coming up next April, it's nine months away, postponing this until then -- postponing action nine months until next April would be a reasonable amount of time to work things out but not stretch things out so far that it goes on to the interminable future. So just a sense that I will be voting in opposition on the motion.

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CHAIRMAN CHRISTIANSON: Thank you,

Glenn. Greq.

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MR. RISDAHL: Yeah, I guess I'm going over Kevin's thoughts here. You know, the State supported the original proposal, conclusion by OSM, if we just kept it to the units with two bear harvest limits -- to the units with a two bear harvest limit, that would be the easiest thing of all. And then if we wanted to further pursue this process we could work out some of the details but, here, you would have a regulation in place that allowed subsistence -- Federal subsistence users to do the same thing they're doing through the State program. It would be, from the way I understand it, there's really no difference at that point. But then we could work out some of these other details where maybe we could get a Federal permit that really just required people to -- you can hunt them and we have an OMB permit, which is basically you get one and you go in and you get it tagged and then you can do what you need to do, basically sell it within the Continental U.S., or whatever. It's just a thought because I mean we're kind of going back and forth here, there's a lot of things we don't know, but if -- I think if we went along with what the State suggested at this point we would have a season, that would be a start.

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Anyway, just a thought. I don't know if there's something I'm missing here.

CHAIRMAN CHRISTIANSON: And then -- no, I thought that was a good point because -- and then I heard if -- I mean is there a potential that the Federal Board puts a two bear limit in and then State recognized it, is that what I heard, would recognize our two bear limit for that region?

MR. MULLIGAN: So that would be the difference. If you put in a two -- the easie -- for the record, the easiest thing for the person to do is to go to the Board of Game to put in for a two bear limit. It would be faster and I would say easier. No offense, but our process tends to move a little faster and if something like you guys did on your end, there could be reason for them to submit an ACR out of cycle in order to bring that up. I can't say that definitively but because of what happens over here, the Board could choose that that would be something they would bring up on their side in order to bring it up to a two bear limit, bring it in alignment and Bob's your Uncle.

CHAIRMAN CHRISTIANSON: I'm trying to look past you for a second, Lisa.

(Laughter)

CHAIRMAN CHRISTIANSON: Only, I'm just trying to -- usually when we get to this part it's the Board, you know, I'm not trying to be that way but I'm trying to be that way.

 $$\operatorname{MR}.$  WOODS: I've been writing down, Mr. Chair, for the record.....

CHAIRMAN CHRISTIANSON: Sorry, Lisa, so go ahead Frank.

 MR. WOODS: Frank Woods, Public Member. I've been writing down pros and cons and there's a lot more pros than cons. We could work out logistics, the fears, the details. Once we get a regulation we're going to have proposals to change that regulation, right, it'll give time for the State to react and we have action. So that's my stand.

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0187
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                     Thanks.
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                     CHAIRMAN CHRISTIANSON: And just for
 4
     the record we forgot to put the original language on
     the record. I'm going to do that now just so we can
 5
     support WP25-01 [sic] with modifications that hides of
 6
 7
    brown bears with or without claws attached may be
    purchased with the United States for personal use and
 8
 9
    not to be resold. The hunter must request an Office of
10
    Subsistence customary trade permit and must return the
11
    permit to OSM. Additionally, the modification
12
    eliminates regulation requiring the skin of the skull
13
    and claws of the brown bear hides to be retained at the
14
    time of sealing in certain areas.
15
16
                     The regulation should read:
17
    Utilization of fish, wildlife and shellfish, you may
18
    sell the raw untanned or tanned hide or cape from a
19
    legally harvested caribou, deer, elk, goat, moose,
20
    muskox or sheep -- yeah, then it just goes on to
21
    discuss it there.
22
23
                     And so as we discuss that in alignment,
24
     I know part of our regulation also discusses claws and
25
     then if we're sitting here discussing -- I've heard
26
     some potential amendments to move forward so we would
27
    have to do that if we were going to change the original
28
    motion.
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30
                     MS. LEONETTI: It's the full.....
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32
                     CHAIRMAN CHRISTIANSON: Oh, it's the
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     full thing.
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35
                     MS. LEONETTI: ....all that
36
     regulation, so you could just say what's written on
37
     Page 93.
38
39
                     CHAIRMAN CHRISTIANSON: And what's
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     written on Page 93.
41
42
                     MS. LEONETTI: Of the Board book.
43
44
                     CHAIRMAN CHRISTIANSON: Of the Board
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    book.
46
47
                     MR. ALBERG: Mr. Chair, Dave Alberg
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    with the Park Service. So if I could, maybe a question
     for the Solicitor. If this is adopted with the OSM
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 recommendations and the language that is struck out, or language you were just referring to, portions of it, does it put us at a place where the user is already -- there are individual users that may be vulnerable legally already because it will take us some time to get some of this other language we've been talking about cleaned up? I would be interested, from the Solicitor's perspective if I'm way off or if you see that in the same way?

MS. DOEHL: Through Mr. Chair and Member Alberg. I guess one of the things that this motion provides for is that there be a customary trade permit and since that will take a while to create and set up, that does provide some time, both before someone would be at risk and also someone could make a motion to amend this to put a start -- you know, to make the effective date after some kind of a scheme is in place. But -- and also I am not particularly comfortable speaking for law enforcement neither in terms of what kinds of cases they would take on or not take on and especially if it turned out that it was State law enforcement. So I'm afraid I don't have the information to answer the rest of that question.

CHAIRMAN CHRISTIANSON: I'm sorry, Lisa, we really need you up here.

(Laughter)

MS. GREDIAGIN: Thanks. Through the Chair, Lisa Grediagin. I just wanted to address the suggestion of reverting to the original OSM conclusion to just align with State regulations.

First of all, the State's position as stated on Page 105 in your meeting books is that ADF&G supports the proposal if it is modified to only allow the sale of brown bear hides with claws attached in areas where the Federal harvest limit is two bears every regulatory year.

So anyway just to emphasize that, at least, the written ADF&G position is that they would support, you know, allowing the sale of hides where the Federal harvest limit is two bears even if the State harvest limit is one bear, but it's -- even if we reverted to that you still run into the issue of the State subsistence permit. For example, in Unit 23 the

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0189
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    Federal regulation is two bears by State subsistence
    permit, and, again, the condition of that permit is
    that at the time of sealing the claws and the skin of
    the head is retained. And so even if, you know, the
 5
     State's saying, oh, it's a two brown bear harvest
 6
    limit, we'll allow you to sell it they're still going
 7
    to keep the claws and skin of the head because it's by
 8
     State subsistence permit.
 9
10
                     So, again, I really think the issue
11
    here is the requirements of the State subsistence
12
    permit.
13
14
                     Thanks.
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16
                     MS. WESSELS: And if the Board modifies
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    the proposal to go back to what it was then you will
18
    need to provide justification why you did not go along
19
    with the Council's recommendation because the Councils
20
    were voting on the proposals with the OSM amendment,
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    that's their last recommendation.
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23
                     CHAIRMAN CHRISTIANSON: Motion's on the
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    floor.
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26
                     (No comments)
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                     CHAIRMAN CHRISTIANSON: Call for the
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    question.
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                     MR. BROWER: Ouestion.
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                     CHAIRMAN CHRISTIANSON: Question's been
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    called. Roll call.
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                     MR. RISDAHL: Mr. Chair, could you
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    please read the motion in its.....
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                     CHAIRMAN CHRISTIANSON: Entirety?
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                     MR. RISDAHL: Yes, please.
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43
                     CHAIRMAN CHRISTIANSON: All two pages,
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     you got it.
45
46
                     All right.
47
48
                     The OSM conclusion is to support WP25-
49
     01 [sic] with modification, that the hides of brown
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bears with or without claws attached may be purchased within the United States for personal use and not to be resold. The hunter must request an Office of Subsistence Management customary trade permit and must return the permit to OSM. Additionally, this modification eliminates regulations requiring the skin of the skull and claws of the brown bear hides to be retained at the time of the sealing in certain areas.

## The regulation should read:

Subsistence taking of fish, wildlife, and shellfish general regulations utilization of fish, wildlife or shellfish. You may sell the raw untanned or tanned hide or cape from a legally harvested caribou, deer, elk, goat, moose, muskox or sheep. You may request a customary trade permit to sell the hide with or without claws attached of a brown bear legally harvested under Federal subsistence regulation providing the hide is purchased within the United States for personal use and not to be resold. These customary trade sales must be immediately recorded on a customary trade permit and must be returned within the timeframe specified on the permit. The hide must be sealed, the seal must remain on the hide and the seal number must be included in any advertisement of sale.

Subsistence taking of wildlife sealing of the bear skins and skulls, you must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from a skull and seal both the skull and the skin; however, this provision does not apply to the brown bears taken within Units 5, 9B, 9E, 17, 18, 19A and 19B, downstream of and including the Aniak River Drainage and Units 21D, 22, 23, 24 and 26A and which are not removed from the unit. If the skin or skull of a bear taken in Units 9B, 17, 18, and 19A and 19B downstream of and including the Aniak River Drainage is removed from the area you must first have it sealed by an ADF&G representative in Bethel, Dillingham or McGrath. If you remove the skin or skull of a bear taken in Units 21D, 22, 23, 24 and 26A from the area are presented for commercial tanning within the area you must first have it sealed by an ADF&G representative in Barrow, Galena, Nome or Kotzebue. If you remove the skin or skull of a bear taken in Unit 5 from the area you must first have it sealed by the ADF&G representative in Yakutat. you remove a skin or skull of a bear taken in Unit 9E

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0191
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     from Unit 9 you must first have it sealed by an
     authorized sealing representative.
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                     That's for the record.
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                     MS. LEONETTI: Okay, so roll call vote
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     on the motion.
                    I'll start with Glenn Chen, BIA.
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                     MR. CHEN: The BIA votes no.
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                     MS. LEONETTI: Okay, thank you.
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                     Dave Alberg, Park Service.
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                     MR. ALBERG: Mr. Chair. The National
     Park Service votes to support Wildlife Proposal WP24-01
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17
     as modified by OSM for all nine of the RAC regions that
18
     supported it.
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                     MS. LEONETTI: BLM, Kevin Pendergast.
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22
                     MR. PENDERGAST: Thank you. BLM votes
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     to support WP24-01 as modified by OSM. Justification
     is that I believe, based on everything I've heard today
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25
     and read that the RACs have weighed in loudly that they
26
     want to be able to sell the hides. I feel like there's
27
     a lot of bureaucratic hurdles that are going to need to
28
    be cleared to be able to make that happen but, you
29
     know, by supporting this I think if it passes we're
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     committing as a body to making sure that happens so
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     that people can adhere to those processes and be in
32
     compliance. But on balance I think we've heard pretty
33
     loudly that this is what folks want and desire. And
34
     while I regret that the misalignment in process on the
35
     State level, I think in principle, it aligns with the
     State and that people will be able to harvest and sell
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37
    bear hides from both Federal lands and State lands.
38
                     Thank you.
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                     MS. LEONETTI: Thank you.
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43
                     Public Member Frank Woods.
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                     MR. WOODS: Public Member Frank Woods,
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     in favor.
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                     MS. LEONETTI: Public Member Ben
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     Payenna.
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                     MR. PAYENNA: I vote in favor.
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                     MS. LEONETTI: Forest Service Greg
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    Risdahl.
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                     MR. RISDAHL: The Forest Service is
 7
     going to support this but I also want to say that I'm
     sitting in the same place as Kevin is of BLM, that
 9
     there are a lot of things we still have to figure out
10
    and in order for this to work efficiently for
11
    subsistence users we have a lot yet to do on this
    because we are still relying heavily on the State no
12
    matter how you look at it. So I'm supporting the
13
14
    concept of it and -- but I would say it's in contingent
15
     of getting the permission that we need from OMB and
16
     looking into some of the way things are done for some
17
     of other species that require customary trade permits,
18
     so that's where we are.
19
20
                     Thank you.
21
                     MS. LEONETTI: Thank you.
22
23
24
                     Public Member Charlie Brower.
25
26
                     MR. BROWER: Support Proposal WP25-01
27
     [sic] with modification.
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29
                     MS. LEONETTI: Thank you. 24-01, yeah.
30
31
                     MR. BROWER: 24-01.
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33
                     MS. LEONETTI: Yeah, got it.
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                     MR. BROWER: Excuse me, 24-01,
36
     correction.
37
38
                     MS. LEONETTI: Thank you.
39
40
                     Fish and Wildlife Service, Sara Boario.
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42
                     MS. BOARIO: The Fish and Wildlife
43
     Service opposes. We appreciate and support the efforts
44
     made by OSM, the RACs and the Board members to find a
45
     way to support subsistence users in their efforts to
46
     sell a bear hide from a subsistence hunt, and I'm glad
47
     to hear the State say there are no conservation
48
     concerns, however, we have heard a number of other
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     concerns around the table and from the State of Alaska
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0193
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     since this proposal has been submitted that are not yet
     completely addressed. I agree with the BIA's previous
     comments and feel like more details need to be worked
     through on the front end of this process, not while
 5
     we're working through the OMB Paperwork Reduction Act
 6
     effort, and the RACs could contribute to developing
 7
     those details in the coming months.
 8
 9
                     Additionally, the Fish and Wildlife
10
     Service delegates our CITES authority to the State of
11
    Alaska and, although, they are neutral, due to their
12
     continued concerns and statements around the sealing
13
    process, the conditions of the State subsistence permit
14
     and the potential implications for hunters and
15
    harvesters, including unresolved questions around
16
     enforcement and prosecution, the Fish and Wildlife
17
     Service opposes.
18
19
                     Thank you.
20
21
                     MS. LEONETTI: Thank you.
22
23
                     Public Member Ray Oney.
24
25
                     (No comments)
26
                     MS. LEONETTI: Ray, are you there, if
27
28
     you are muted, you may have to press star, six to
29
     unmute.
30
31
                     (No comments)
32
33
                     MS. LEONETTI: We can come back to Ray.
34
35
                     Public Member Rhonda Pitka.
36
37
                     MS. PITKA: I vote to support this
38
    proposal in deference to the Regional Advisory Council
39
     recommendations. 90 percent of the Regional Advisory
     Councils want this and their lengthy discussions at
40
41
     each of the Regional Advisory Council meetings, along
42
    with the lengthy discussion we had last April, I feel
43
     like I'm very informed on this one and the people from
44
    the regions want it. It's now up to the Federal
     government to make that happen with the permit system.
45
46
     I have a lot of faith that the Federal government can
47
    make that happen.
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Thank you.

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1		MS. LEONETTI: Thank you.
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3 4	Onou if would	I'll come back to Public Member Ray
5	oney, ii you're	online you can speak up.
6		MR. ONEY: Yes, can you hear me
7	Crystal?	<u>,</u>
8	_	
9		MS. LEONETTI: Yes, I can hear you, go
10	ahead.	
11		MD ONEY. Obor thoule you I om in
12 13	support of WD2/1.	MR. ONEY: Okay, thank you. I am in -01 with modifications by OSM.
14	support or Wrz4	of with modifications by osm.
15		MS. LEONETTI: Okay, thank you.
16		
17		And, lastly, Chair Tony Christianson.
18		
19		CHAIRMAN CHRISTIANSON: I support in
20	deference to the	e RACs.
21 22		MC IFONETHT. Thank you
23		MS. LEONETTI: Thank you.
24		Mr. Chair, the motion passes.
25		in onar, one mooren passes.
26		CHAIRMAN CHRISTIANSON: Thank you.
27		for that work and trying to vett out
28	_	le situation. Appreciate the State for
29		e and apologize for going down rabbit
30 31		e're just trying to figure this out, so
32	we appreciate it	
33		We'll take a five minute break and come
34	back for the nex	kt agenda I think we have one agenda
35		on't forget we also have Executive
36	Session following	ng so we have one more agenda item and
37		go reconvene our Executive Session so
38	five, 10 minute	break and we'll come back.
39		(0.55,,)
40 41		(Off record)
42		(On record)
43		(on record)
44		CHAIRMAN CHRISTIANSON: All right,
45	welcome back to	the meeting here. We're just going to
46	invite Robbin, s	she has the next agenda item, I believe
47	is correspondent	ce to the Board.
48		MO TANTANA MI I I I I I I I I I I I I I I I I I I
49 50		MS. LAVINE: Thank you, Mr. Chair.
J U		

0195 1 Members of the Board. I will be presenting an update on Board correspondence to and from the Councils. 2 3 4 You've been given some handouts, you 5 should find a package of tables like this. Another 6 package of the USDA Interior response letters to other 7 Councils that came through at the end of last year, the beginning of this year, and also a new letter to the 9 Board from Southeast for your awareness. 10 11 So this update is a standing agenda 12 item at -- oh, yes? 13 14 (Pause) 15 16 MS. LAVINE: Hello, testing, can you 17 hear me -- no? 18 19 (Pause) 20 21 MS. LAVINE: And, now, and, again, can 22 you hear me? 23 24 UNIDENTIFIED VOICE ONLINE: I can hear 25 you fine. 26 27 MS. LAVINE: Oh, very good, thank you. 28 All right, folks, so this is a recent, you know, I 29 think last year and a half, this has been a recent 30 standing agenda item at all Board meetings, it's an 31 effort to track communications by the Councils to the 32 Board or through the Board and it's made some 33 difference over time. All correspondence from the 34 Councils is shared with the Board year-round by OSM as 35 soon as the finished letters are approved by the 36 Council Chair. So you should all have received the 37 letters as they were produced throughout the year. 38 There were a whole bunch of new ones that came through 39 this spring. 40 41 They're also reviewed by the ISC. Any 42 letters to the Board or the Chair will be reviewed by 43 the ISC at a regularly scheduled meeting. We have --44 we go through kind of like a validation like process, 45 what actions are required and we look at three 46 categories, are these letters informational only, and 47 then we just review and discuss; do these letters 48 require a transmittal, which means we're sending them

outside the Program to the Secretaries or someone else

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and then we also ask, are they requiring Board action or response. When we discuss these letters, the reasons for discussing them at the ISC is so that the InterAgency Staff Committee who's support Staff to the Board is up to date on all these communications and can discuss these letters or these communications with you, the Federal Subsistence Board.

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Because this is a new process we're still getting up to speed. So today I will only focus on Council's requesting the Board elevate correspondence to the Secretary. So you should have before you tables describing Council letters asking the Board to elevate or forward concerns so that's the first -- that's on the first page, and if you flip the page you'll see tables, Council correspondence to the Board, Board letters to the Secretary and Council correspondence to Board agencies. The highlighted text indicates pending actions and the bold text indicates the correspondence from the Councils since the last meeting. So you'll see at the end of each section you've got this kind of cream colored, those are the most recent letters that came through and the dates on which they were mailed.

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So we'll be focusing on the two first pages of the table's handout.

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Some of these issues you've really already discussed yesterday with the annual reports and replies. These are issues that have long been of great importance to the Councils, there are three of them. One is letters on D-1 lands. The other are letters regarding fisheries management. And the last group is for compensation. At our Board meeting in February, these three issues had such great importance to the Councils they wrote a lot of joint letters through the Board to the Secretaries, they were discussed with the Secretary when she came in person in 2003 -- 2023, and they were forwarded to the Secretaries for their notice and in some cases the Board had additional concerns to add. There's a package that you have of the Secretary of the Interior, or the Assistant Joan Mooney, and you'll see that she responded to a lot of these, the last Administration responded to a lot of these letters basically on their last day in office and it's great that we've got that response and such strong response, a number of letters, but it was from an outgoing Administration. So a lot of the Councils want us to

forward the same group of letters and, in fact, potentially some new ones to the new Administration. 2 And we did discuss forwarding ANCSA -- let me see, BLM D-1 lands, ANCSA D-1 lands in February and we did 5 discuss forwarding on all of the joint letters, specifically the ones about either ANCSA or fisheries 6 7 management issues or Council compensation, and at that time the Board said, yep, we should forward them, we're 9 revisiting this now and asking for your direction. 10 There have been a lot of changes that have taken place 11 on the Board, within the current Administration in 12 state and in D.C., and so we are touching base with you 13 if the intent is still to forward all of these letters, 14 we have a new group of them as you'll note. So for the 15 D-1 lands, we would have some joint letters from before 16 that we would send and brand new ones, and I would 17 imagine that the response from the current 18 Administration would be different than from the last on

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that particular issue.

So I'm going to pause and I will ask the Board to respond to request to elevate the ANCSA D-1 withdrawal letters, both new and past, to the current Administration.

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CHAIRMAN CHRISTIANSON: Robbin -- oh, go ahead.

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MS. PITKA: I was going to say we should still send those letters, you know, they still require a response from whichever Administration that we're sending those issues to for the issues on the ground to go up.

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Thank you.

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MR. PENDERGAST: Thank you. Pendergast. I'm a little confused as to what the question is or what the problem is we're trying to solve with respect to these 17 D-1 letters, in particular, from BLM's perspective. But they were sent to -- who were they originally addressed to and what is our decision on the Board?

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MS. LAVINE: They were originally sent to the Secretaries of the last Administration requesting that the D-1 lands.....

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MR. PENDERGAST: Right, so they were

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0198
     addressed to the Secretary?
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                     MS. LAVINE: Right.
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                     MR. PENDERGAST: So why do we need to
 6
    resend them?
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                     MS. LAVINE: Because there's been a
 9
     change in Administration and in a change in direction
10
     from the Administration on how to address D-1 lands.
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12
                     MS. WESSELS: Yes, these letters are
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     the new letters, the previous letters were sent by the
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     Board, they were forwarded from the Councils, the
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     Council sends letters to the Board, the Board forwarded
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     them to the previous Administration. These ones, as
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     you can see the date of the letter is this spring. The
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    Councils were concerned because they heard that the D-1
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    land protections will be eliminated so four of them
20
    wrote new letters to the Board asking the Board to
21
    forward it to the Secretaries so the Board is free to
    decide whatever.
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23
24
                     MR. PENDERGAST: I see. So -- but they
25
    were sent to the Board and.....
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27
                     MS. WESSELS: Yes, because the
28
    Councils....
29
30
                     MR. PENDERGAST: .....so the Board's
31
     decision is whether or not to forward them on?
32
33
                     MS. WESSELS: Councils cannot
34
     communicate directly with the Secretaries.....
35
36
                     MR. PENDERGAST: Thank you.
37
38
                     MS. WESSELS: ....that's per Board's
39
    policy.
40
41
                     MR. PENDERGAST: Okay, thanks.
42
43
                     CHAIRMAN CHRISTIANSON: And kind of the
44
     Board policy that we have is if it's outside of our
     scope of work here, right, we just elevate the concerns
45
46
     of our RACs to the appropriate, which is our boss, so
47
    that he's aware of the situation so then we're not just
48
     sitting on our hands when we take things that are
49
     affecting subsistence.
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MR. PENDERGAST: Well, and if it's helpful, I mean obviously the 17 D-1 issue is squarely in BLM's portfolio, it's something we've got to deal with under the Executive Order as well so this is something the Secretary is very aware of and we've received multiple letters direct and that we've forwarded on so it's not going to be a new thing, just for folks awareness.

MS. WESSELS: Yeah, and I just wanted to add that, you know, Councils represent the public and so in a way it's like a public comment, it's just that they cannot write directly to the Secretary because they are appointed by the Secretary.

MR. WOODS: Are we going to do it one letter at a time, one issue, D-1, or are we going to do as a whole, because I went through the letters of D-1 and then it goes into different topics; how do you want us to handle this?

MS. LAVINE: Mr. Chair. The response letters that you have were from the past Administration, they're just for your information, right, on these particular issues. And so the response letters that I've handed you are -- you don't need to make any decisions on them, they're just for reference.

CHAIRMAN CHRISTIANSON: So really what we're hearing, is just, are we going to forward the letters at the request of our RACs, which I think we should, and move them forward so the new Administration is abreast of what we're dealing with at the regional level and that we're supporting our RACs in communicating with our boss about issues that are affecting subsistence, and that's what we have before us and I support that concept.

 $$\operatorname{MR.}$  PENDERGAST: So is there a motion needed or what?

MR. WOODS: So moved.

MR. PENDERGAST: Second if we need it.

CHAIRMAN CHRISTIANSON: A motion been made to accept that we do exactly as we're recommended to support the RACs and to forward the old letters and the new letters so that they're abreast of the

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0200
 1
     situations and can we get a response from the new
     Administration. We have a motion and a second on the
 2
     floor, any further discussion.
 4
 5
                     Yes.
 6
 7
                     MS. BOARIO: Just to clarify, is the
 8
    motion just about the D-1 lands letters or this is --
 9
     okay, so we'll do each topic separately, okay, thank
10
     you.
11
12
                     CHAIRMAN CHRISTIANSON: Good question.
13
     Any other discussion, this is about D-1. Yes.
14
15
                     MS. PITKA: Not really a question, but
16
     just when we make motions can we please state what the
17
     motion is rather than just state motion because --
18
     thank you, just to keep the record clear.
19
20
                     CHAIRMAN CHRISTIANSON: All in favor
21
     say aye.
22
23
                     IN UNISON: Aye.
24
25
                     CHAIRMAN CHRISTIANSON: Opposed, same
26
     sign.
27
28
                     (No opposing votes)
29
30
                     CHAIRMAN CHRISTIANSON: Motion carries,
31
     D-1.
32
33
                     MS. LAVINE: Thank you, Mr. Chair. The
34
    next slug of letters is fisheries management and
35
    bycatch. We have a few new letters in that category
36
     and I think there was also discussion about if
37
     forwarding these new letters that the Secretaries in
38
    this new Administration be aware of the correspondence
39
    that went before. So I'm looking, again, for your
     approval or thoughts on forwarding these. And part of
40
41
    the reason why we're having this discussion other than
42
    just like transmit them, forward them on, is that we
43
    typically just forward all the letters on with a
44
    transmittal letter, like a cover letter, right and
    basically just describing this -- the contents.
45
46
     Sometimes we add our own, the Board adds their own
47
     comments if they wish. I would suggest that -- and
48
     that's why we're having this discussion. But I would
49
     suggest that it's a pretty simple transmittal at this
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0201
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     point in time.
 2
 3
                     So I'm looking for a motion to forward
 4
     on fisheries management and bycatch letters.
 5
 6
                     CHAIRMAN CHRISTIANSON: The floor is
 7
     open for a motion.
 8
 9
                     MR. RISDAHL: Mr. Chair. I'll make the
10
    motion to forward on the fisheries management issue
11
    letters to the Secretaries.
12
13
                     MR. WOODS: Second that motion.
14
15
                     CHAIRMAN CHRISTIANSON: Motion been
16
    made and seconded. Any further discussion.
17
18
                     (No comments)
19
20
                     CHAIRMAN CHRISTIANSON: Call for the
21
    question.
22
23
                     MR. BROWER: Question.
24
25
                     CHAIRMAN CHRISTIANSON: All in favor
26
     say aye.
27
28
                     IN UNISON: Aye.
29
30
                     CHAIRMAN CHRISTIANSON: Opposed, same
31
     sign.
32
33
                     (No opposing votes)
34
35
                     CHAIRMAN CHRISTIANSON: Motion carries
36
    unanimous, thank you.
37
                     MS. LAVINE: And last is Council member
38
39
     compensation. We don't have any new letters on this
     but this is a standing issue of concern and I believe
40
41
     the response from the previous Administration was
42
     supportive but to continue this discussion with the new
43
    Administration. And so basically we would be
44
     reinitiating, forwarding on the prior letters from all
45
     10 Councils to get a response from the new
46
    Administration.
47
48
                     Thank you, Mr. Chair.
49
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0202
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                     MR. WOODS: I would make a motion that
 2
    we forward on the letters from the previous
     recommendations to the current Administration.
 4
 5
                     MR. RISDAHL: I'll second that motion,
 6
    Mr. Chair.
 7
 8
                     CHAIRMAN CHRISTIANSON:
                                             Thank you,
 9
     guys, and this is in regards to the compensation for
10
     our RAC members.
11
12
                     MR. WOODS: Yes.
13
14
                     CHAIRMAN CHRISTIANSON: So this motion
15
     would be to reflect that we forward the letters from
     the RACs to the appropriate people about the RAC
16
17
     compensation. Any further discussion.
18
19
                     (No comments)
20
21
                     CHAIRMAN CHRISTIANSON: All in favor
22
     say aye.
23
24
                     IN UNISON: Aye.
25
26
                     CHAIRMAN CHRISTIANSON: Opposed, same
27
     sign.
28
29
                     (No opposing votes)
30
31
                     CHAIRMAN CHRISTIANSON: Motion carries
32
     unanimous to forward the compensation letters.
33
34
                     MS. LAVINE: Thank you, Mr. Chair. The
35
    next agenda item is our 2026 Board meeting dates. We
     want to confirm the first two and discuss options for
36
37
     the next summer work session. Included on the last
38
     page of your detailed agenda is a list of competing
39
    meetings around the same time that we are holding the
40
    FRMP work session. So if you want to take a look at
41
    that, I would just like to point out that I think until
42
    last week the final action on the Bering chum salmon
43
    bycatch management meeting was scheduled for the fall
44
     and it has just recently rescheduled for the same
45
     timeframe that we are holding the FRMP that the Alaska
46
    Forum on the environment is being scheduled, and before
47
    that, they are back to back meetings in January and so
48
     I -- we've been taken to task for having meetings that
49
     overlap with others, we're trying to get ahead of the
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0203 game, and we're not going to be able to satisfy everyone. So if I -- I would just like to confirm that you approve of February 4th and 5th although it's likely going to be a one day meeting but we're going to hold those two dates just in case our agenda expands. 6 7 (Laughter) 8 9 MR. BROWER: Mr. Chair. Are you doing 10 one by one or are you doing it as a block? 11 12 MS. LAVINE: Well, we could move on to 13 the next and then we could -- well, let's do the first 14 two, confirm them and then let's discuss the summer 15 work session. So the next wildlife regulatory meeting we scheduled for the 3rd week in April, that's going to 16 17 be a full week and it kind of  $\ensuremath{\text{--}}$  it fits in with 18 everything else, we're not overlapping horribly with 19 anything else. So that would be our wildlife 20 regulatory meeting scheduled for April 20th through 21 24th. 22 23 So now looking at all of the conflicts, 24 the meeting conflicts that we have at the end of your 25 detailed agenda and then looking at the dates that 26 we've selected, I would just like Board confirmation. 27 28 CHAIRMAN CHRISTIANSON: It looks good 29 to me. 30 31 32 33 34 35

MS. LAVINE: Excellent. So then we proceed, the summer work session. This year we held it earlier than we have in quite some time and what we're hearing is that it's too early so July 22nd and 23rd might be one that we cross out and then we might look at July 29th and 30th or August 5th and 6th and I'm curious to know what might work better with your schedules and your rhythms outside of the office.

38 39 40

36

37

Thank you.

41 42

MR. BROWER: Mr. Chair.

43 44

CHAIRMAN CHRISTIANSON: Go ahead,

45 Charlie.

46 47

MR. BROWER: Is there a way we can change the summer session, this is right in the middle of our subsistence activities, that part of July and

49 50

first week of August, or the second -- yeah, first week of August, is there a better date. I mean summer is our active hunting.

MS. LAVINE: Thank you, Mr. Brower. Our challenge is trying to approve the annual report replies and the Council nomination packages in time, first the annual reports, to prepare them for the fall meeting cycle for the Councils, and then the nominations need to be made early enough so that they are approved in D.C., in time for the next cycle, the next year basically. And the further we push that back, the more challenging that becomes.

MR. PENDERGAST: So I just want to note for folks, maybe newer to the Board, of which I'm one but I happen to know this and Robbin's probably going to kick me under the table but annual report replies are not required, so I don't see that as a real schedule driver, I mean if they happen, great, but it's not a necessary part of the process, it's just something OSM and the Board have chosen to do. So I think I would rather defer to schedules and rhythms in terms of scheduling.

CHAIRMAN CHRISTIANSON: And just to kind of put context to that, though, this is that same work session, so we are in that day, yeah.

MR. PENDERGAST: Right, I just -- I

mean....

CHAIRMAN CHRISTIANSON: Yeah, so it's not just us doing annual reports, it's deliberation on where we can fit other work items into it.

MR. PENDERGAST: And that's the other.

CHAIRMAN CHRISTIANSON: Yeah, but a little later for me as well as we noticed last week, middle of July was tight for us, I know, but then it pushes Charlie Brower into his season so it's kind of a Catch-22. But the later away from that is better for

MS. WESSELS: Yeah, I just wanted to add, though it doesn't specifically said in ANILCA that there needs to be a reply to the annual reports but it says that the Board shall consider the report and the

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0205
    Councils develop their new annual reports during their
     fall meetings so they really need to hear the answers
    from the Board before the fall meetings, what does the
    Board think on this or that item that they brought up.
 5
     So the replies, they need to be ready before the fall
    meetings and, you know, also during the work session
 6
 7
    there is executive session paired together so the
    packet for the Secretaries need to be prepared as soon
 8
 9
     as possible so the Secretary and the White House have
10
    enough time to review them before everybody's
11
     appointments expire in December 2nd. And specifically
12
     for me since I'm making so many presentation during the
13
    work session and executive session, like out of these
14
    days, 22nd, 23rd, you probably most likely will have me
15
    but not after that. But don't base your decision on
16
     this because we'll find somebody, most likely Brooke.
17
18
                     (Laughter)
19
20
                     MS. WESSELS: Who will be doing it
21
     instead of me so that's all I want to say.
22
                     CHAIRMAN CHRISTIANSON: I'm sure she
23
24
     can handle it like Rhonda handles it.
25
26
                     (Laughter)
27
28
                     MS. PITKA: August 5th and 6th works
29
     for me. Yep.
30
31
                     MR. BROWER: Mr. Chair.
32
33
                     CHAIRMAN CHRISTIANSON: Charlie.
34
35
                     MR. BROWER: I don't have much problem
36
     with those dates. If I need to attend by
37
     teleconference I can, if I need to come down I will so
38
     I'll go with the flow.
39
40
                     CHAIRMAN CHRISTIANSON:
                                             So right now
41
     I'm hearing 4th and 5th is probably a date that's
42
    better for Frank, that's good for Dave, and I'm not
43
     seeing agency people saying it don't work, that works
     for me, so the 4th and 5th, thank you.
44
45
46
                     MS. LEONETTI: 5th and 6th.
47
48
                     CHAIRMAN CHRISTIANSON: 5th and 6th.
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0206
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                    MS. LAVINE: 5th and 6th.
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 3
                     CHAIRMAN CHRISTIANSON: August.
 4
 5
                     MR. BROWER: August 5th and 6th.
 6
 7
                     CHAIRMAN CHRISTIANSON: August 5th and
 8
     6th, thank you. Holy, Brooke just took a deep breath.
 9
10
                     MS. WESSELS: Yeah, so Brooke is just
11
     doing the annual reports.
12
13
                     CHAIRMAN CHRISTIANSON:
                                            Thank you quys
14
    for that presentation. At this time this concludes the
15
    public section of this meeting. Rhonda has something
16
     to say.
17
18
                     MS. PITKA: Yeah. So I'd like to make
19
     a motion to request a meeting with the Secretary of the
20
     Interior during AFN week.
21
22
                     CHAIRMAN CHRISTIANSON:
                                            Thank you,
    Rhonda, for that. I know we needed to get that on the
23
24
     record, we discussed it all week, and so we do before
25
     we adjourn here, have a motion by Rhonda to.....
26
27
                     MR. BROWER: Second.
28
29
                     CHAIRMAN CHRISTIANSON: .....and we
30
    have a second on the floor to extend an invitation to
31
     the Secretary to come, to have audience so we can take
32
     the list we have here and the letters we have and
33
     create a summary and give a face to face feel for the
34
     Program especially in light of where we're at with
35
    review. I think it's a good opportunity to see our
36
    boss.
37
38
                     MR. BROWER: Ouestion.
39
40
                     CHAIRMAN CHRISTIANSON: All in favor
41
     say aye.
42
43
                     IN UNISON: Aye.
44
45
                     CHAIRMAN CHRISTIANSON: Opposed, same
46
     sign.
47
48
                     (No opposing votes)
49
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0207
 1
                     CHAIRMAN CHRISTIANSON: Motion carries
 2
    unanimous to support forwarding our request for
     audience. Thank you.
 4
 5
                     MS. PITKA: I'd like to also make a
 6
    motion for a letter of apology for delayed responses to
 7
     the Regional Advisory Councils.
 9
                     MR. WOODS: Second.
10
11
                     MR. BROWER: What's the motion?
12
13
                     MS. PITKA: A motion for a letter of
14
     apology to the Regional Advisory Councils for our
15
     delayed responses in the replies that we've been
16
     getting.
17
18
                     CHAIRMAN CHRISTIANSON: We have a
19
    motion and been seconded, and under context of that I
20
    would hope that we just add in there some of the -- you
21
    know, the staffing concerns and other situations we
22
    discussed here just so they could get a clear picture
23
    of where the Program is in its entirety, you know,
24
    because we are their support mechanism and so having an
25
    understanding of context too, that makes sense, for our
26
     Staff as well so appreciate that.
27
28
                     All in favor say aye.
29
30
                     IN UNISON: Aye.
31
32
                     CHAIRMAN CHRISTIANSON: Opposed, same
33
     sign.
34
35
                     MR. PENDERGAST: Oppose.
36
37
                     CHAIRMAN CHRISTIANSON: One in
38
     opposition, Kevin.
39
40
                     MS. DOEHL: And what about the one
41
    person, Ray Oney.
42
43
                     CHAIRMAN CHRISTIANSON: Ray, how do you
44
     feel? Ray, do we have your concurrence online? Thank
45
     you for that Lisa. Star, six, partner.
46
47
                     UNIDENTIFIED VOICE: He's skinning a
48
    brown bear.
49
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0208
 1
                     CHAIRMAN CHRISTIANSON: Mr. Oney, Ray
 2
    Oney, are you online, can you star, six? Maybe we lost
 3
 4
 5
                     MS. PITKA: He may have been trying to
 6
    get back in.
 7
 8
                     MR. BROWER: Is he online?
 9
10
                     CHAIRMAN CHRISTIANSON: Yeah, Ray, are
11
    you still online?
12
13
                     MR. ONEY: Yes, I am, I got
14
    disconnected but I'm back on.
15
16
                     CHAIRMAN CHRISTIANSON: Okay. We were
17
     just making sure you heard the discussion of us
18
     supporting requests for audience with the Secretary and
19
     to request an apology letter be written to the RAC
20
    Boards with some substance about the Program, we were
21
     just making sure that we had your concurrence and
     support on those.
22
23
24
                     MR. ONEY: Yes, I give support.
25
26
                     CHAIRMAN CHRISTIANSON: Okay, thank you
27
     for that. For the record Ray supports. Any other
28
    Council comments.
29
30
                     (No comments)
31
32
                     CHAIRMAN CHRISTIANSON: The floor is
33
    open for adjournment.
34
35
                     MR. WOODS: Move to adjourn.
36
37
                     MS. PITKA: I'll second. This is
38
    Rhonda Pitka.
39
40
                     CHAIRMAN CHRISTIANSON: All right, all
41
     in favor say aye.
42
43
                     IN UNISON: Aye.
44
45
                     CHAIRMAN CHRISTIANSON: Same sign,
46
     opposed.
47
48
                     (No opposing votes)
49
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0209
                         CHAIRMAN CHRISTIANSON: Thank you.
 1
     Meeting adjourned. Thank you all for your good work and getting through this, we'll meet you over there in
 2
 4
     the other room.
 5
 6
                         (Off record)
 7
 8
                            (END OF PROCEEDINGS)
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0210 1 2	CERTIFICATE
2 3 4	UNITED STATES OF AMERICA ) )ss.
5 6	STATE OF ALASKA )
7 8 9 10	I, Salena A. Hile, Notary Public in and for the state of Alaska and reporter of Computer Matrix Court Reporters, LLC, do hereby certify:
11 12 13 14	THAT the foregoing, contain a full, true and correct Transcript of the FEDERAL SUBSISTENCE BOARD MEETING, WORK SESSION taken electronically by our firm on the 24th day of July 2025;
16 17 18 19 20	THAT the transcript is a true and correct transcript requested to be transcribed and thereafter transcribed by under my direction and reduced to print to the best of our knowledge and ability;
21 22 23	THAT I am not an employee, attorney, or party interested in any way in this action.
24 25 26 27 28	DATED at Anchorage, Alaska, this 15th day of August 2025.
29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50	Salena A. Hile Notary Public, State of Alaska My Commission Expires: 09/16/26