



**RESIDENT HUNTERS OF ALASKA**

unapologetically **FOR ALASKAN RESIDENTS**

Working hard to ensure our wildlife is managed sustainably with an emphasis on protecting and enhancing resident hunting opportunities!

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March 9, 2026

**Resident Hunters of Alaska (RHAK)**

**Comments on Rulemaking action DOI-2025-0170**

**Program Review – Subsistence Management for Public Lands in Alaska**

To: Brooke Rollins – Secretary of Agriculture

Kara Moriarty – Senior Advisor to the Secretary of the Interior for Alaska Affairs

Dear Secretary Rollins and Ms. Moriarty,

Thank you for the opportunity to comment on this program review of Subsistence Management for Public Lands in Alaska. And thank you for listening to all the voices out there on this important topic.

Resident Hunters of Alaska (RHAK) is a non-profit grassroots Alaska hunting conservation organization with several thousand members from across the state – including many rural communities – advocating for sustainable wildlife management policies with an emphasis on protecting and enhancing the hunting opportunities for all Alaskans, rural and urban.

We recognize the importance rural communities place on our wildlife resources for nutritional, cultural, and spiritual needs. Subsistence and the subsistence economy is a way of life for many, beyond just food security, and we want that lifestyle to continue. We support a rural subsistence priority when it is necessary to restrict taking to ensure the continued viability of a wildlife population or the continuation of subsistence uses of such populations, as outlined in ANILCA.

Regarding this review of the federal subsistence management program, while we support a rural subsistence priority as stated above, we do believe some changes to the federal subsistence management program are warranted so that federal management is more in line with the intent and language of ANILCA.

**Current System of Dual State & Federal Management**

The dual management system we currently operate under, the differing state and federal hunting regulations, is a poor way to effectively manage our wildlife resources because the

federal and state management priorities are sometimes in conflict and the state's role in wildlife management has been diminished by the federal system.

We can bring western science and Traditional Ecological Knowledge (TEK) together, but only if the Alaska Department of Fish & Game (Department) is allowed to play a more active participatory and collaborative role in the process and everyone agrees to abide by best management practices and get on the same page.

### **Compliance with State & Federal Regulations**

One of the premises of good wildlife management is compliance with state and federal regulations regarding hunting opportunity and reporting of harvests. If we don't know how many animals are being taken, and who is taking them, we can't make informed decisions.

Yet that is what is happening with some FSB decisions to restrict hunting by non-federally qualified users on federal lands, whether it is through the FSB proposal process or via Special Actions. The board is often basing decisions on hearsay. If someone says their subsistence needs are not being met, yet there are no harvest records, no reporting, there is no way to know whether it's true or not.

RHAK has supported closures or restrictions on federal lands in the past based on sound wildlife population estimates that showed significant declines, but we are unable to make informed decisions on when or if subsistence needs are being met because there is minimal compliance among many rural residents to get the required permit in order to legally hunt and then to report harvests.

We continue to encourage federally qualified hunters in rural areas to comply with state and federal permit regulations and to report their harvests. And we encourage federal rangers to start citing those who don't comply. Non-compliance in the end hurts us all.

### **Dual Management Continues to Divide Alaskans**

One way in particular dual management divides us is how offensive it is to Alaskans who are not federally qualified subsistence hunters that they are considered by the Federal Subsistence Board (FSB) to be the exact same as someone who lives Outside our state or in another country. This has been a huge mistake all along, as sometimes it is the out-of-state nonresident hunters who play a big role in crowding and conflicts and game harvests. The FSB process needs to be able to distinguish and differentiate between Alaska residents and nonresidents. For example, if there are concerns for a declining sheep population on federal lands and nonresident guided hunters are harvesting 40 percent of that sheep population, that nonresident component should be addressed first before closing those federal lands to all non-federally qualified users. There should be a clear step-down process for restrictions and closures that first restricts the

nonresident component before it restricts non-federally qualified Alaskans, some of whom are from rural areas but for whatever reason have moved to more urban areas.

### **Role of the Alaska Department of Fish & Game in the Federal Subsistence Management Program**

It was never the intent of ANILCA to supersede the state's management authority of our fish and wildlife, yet that is where we find ourselves today. Federal managers are instituting special hunting seasons for federally qualified users with higher bag limits than the state allows for game populations in significant decline (i.e. Fortymile caribou herd). The FSB is continuing to allow doe and cow harvests for deer and caribou populations in decline, while restricting non-federally qualified hunters over concerns for sustainability (i.e. Unit 2 deer and Western Arctic Caribou Herd). The FSB and federal land managers are making hunting and allocation decisions without collaboration or participation from the Department that aren't at times in the best interests of our wildlife resources and contradictory to state management, which is well outside the scope of what ANILCA allows.

The Department should have a more participatory role in the FSB process and the decisions federal land managers are making. Consultation with the Department should be mandatory for the Office of Subsistence Management before they make any decisions on federal proposals or special actions.

### **Membership of the Federal Subsistence Board (FSB)**

The FSB is set up in a way that the public members give deference to the Regional Advisory Councils (RACs) on any RAC proposals or special action requests that come before them and it seems at the outset that the public members are inclined – before even hearing a proposal or special action request – to support what the RACs are asking for.

Our experience with this “deference” and how some decisions are made by the board absent of real facts is why the addition of new public members in 43 CFR 51.10(b) concerns us.

As this time, we support a repeal of the addition of public members to the board in 43 CFR 51.10(b).

### **Criteria for Regional Advisory Council Membership**

The way Regional Advisory Council (RAC) members are chosen is opaque and doesn't always follow the recommendations of the federal land managers who interview applicants and speak with the applicant's references. Some applicants with strong recommendations from federal land managers to fill a certain seat are somehow not chosen. Instead, someone who doesn't really meet the requirements for that seat is chosen. Essentially, RACs are being stacked in ways

that don't provide adequate balance of membership. Qualified applicants lose faith in the process. We don't know at what level these decisions are being made, but it isn't the way council members are supposed to be chosen.

The public should know who is applying and be able to see the recommendations made by federal managers who do the interviews. The process needs to be transparent. RACs need to be balanced and designated seats need to be filled with a person who meets those specific criteria.

### **Federal Subsistence Board Policies & Procedures for Rural Determination**

Recent decisions by the board on rural determinations and which communities may participate in certain federal hunts have been divisive among rural communities and have led to more competition and conflicts in the field.

The situation in Southeast Alaska with the recent determination that Ketchikan have a rural designation was made without comprehensive study and review on what the effects would be on the deer population, federally qualified hunters, and non-federally qualified hunters on Prince of Wales Island. The decision that Delta Junction would now qualify to participate in the Fortymile caribou federal subsistence hunt after the collapse of the Nelchina caribou herd was also made without real thought on what kind of extra harvests there would be along with competition with traditional Fortymile caribou-dependent communities.

Again, federal managers are trying to create more federal subsistence hunting opportunities without the input of the Department and without considering widespread impacts on the resource or other federally designated rural communities and the traditional game populations they depend upon. This was not the intent of ANILCA.

### **Federal Policies Prohibiting Predator Management**

It continues to surprise us that the role of the federal government to ensure the continued viability of a wildlife population and the continuation of subsistence uses on federal lands does not include predator management when predators are deemed to be a significant factor in game population declines. Predator management is one of the few things we can do to help boost a wildlife population in decline. To not allow it when the goal is to ensure subsistence needs are being met is another aspect of how federal management is at odds with state management.

### **Moving Forward**

Without an Alaska constitutional amendment, the state will never be able to legally give a priority to rural residents as the federal system does. Dual management is likely here to stay. So, how do we make that system work better for our wildlife resources and the people of Alaska?

Again, everyone must be on the same page and follow the same regulations. If there is a federal/state requirement to apply for a registration permit and to report your harvest, everyone needs to comply with that requirement. There also needs to be enforcement of these requirements. We can't have good wildlife management without proper enforcement of regulations.

The Department must be included in the federal decision-making processes. Mandatory consultation and a more participatory role of the state will greatly improve the overall process of how decisions are made..

The nonresident non-federally qualified hunting component should have a means of being addressed by the FSB and federal land managers. Someone from France or the lower-48 should not be considered the same as an Alaska resident. Sometimes, addressing just the nonresident component will address any conservation concerns.

The Traditional Ecological Knowledge of Native Alaskans needs to be incorporated into western science and game management. We can all work together and learn from each other. We can combine different systems for what is best for the wildlife resource. At the same time, we must recognize that the way things were in the past aren't the way things are today. Alaska's climate is changing significantly, which impacts game populations in different ways. The tools we use for hunting have vastly improved accessibility to the land and waters, as well as changed how we all hunt. Decisions need to reflect these changes.

Thank you again for the opportunity to comment on these issues. We strive to work together with all Alaskans for what is best for the resource and our future hunting opportunities.

Sincerely,

Mark Richards

Executive Director Resident Hunters of Alaska

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