

Alaska Department of Fish and Game Comments

Wildlife Proposal WP26-01

This proposal would move in-season authority for federal hunts currently delegated to a federal in-season manager through a delegation of authority letter into unit-specific regulations.

Position

The Alaska Department of Fish & Game (ADF&G) **OPPOSES** this proposal. At this time ADF&G is uncomfortable with the Federal Subsistence Board (FSB) codifying its delegation of in-season management to any of the federal agencies given the issues we've had, and continue to have, with those agencies carrying out the stipulations in those letters of delegation.

Under the President's Executive Order "Unleashing Alaska's Extraordinary Resource Potential" there is language directing all Department of the Interior bureaus to conduct meaningful consultation with ADF&G. Secretarial Order 3422 then directed those bureaus to develop action plans on how they were going to carry out that directive. To take it a step further Secretarial Order 3477 directed all Department of the Interior bureaus and offices to improve coordination with state wildlife agencies.

Background

Over the years ADF&G has experienced issues across the state regarding how the federal agencies and federal in-season managers carry out the stipulations laid out in the delegation of authority letters issued by the FSB. By codifying these delegations, ADF&G believes it would make it more difficult to address any concerns it has with these delegations and how they are being executed.

During the 2022-24 Wildlife Cycle meeting, the FSB approved the creation of a new hunt for caribou in Game Management Unit (GMU) 9C. This approval came along with a Delegation of Authority granted to the Superintendent of the Katmai National Park and Preserve. The requirements of the letter were followed until the announced 2025 season. Then when asked, the ADF&G Area Biologist for the GMU responded to whether they were consulted with, "They told me they were going to do it if that counts as consultation."

For multiple years area and regional ADF&G staff have had issues with communication regarding federal hunts for the Nelchina Caribou Herd and the Bureau of Land Management (BLM) Glenallen Field Office. This issue came to a head as the herd began to decline and consultation became even more important. In 2022, last minute consultation did occur but not until BLM had already issued permits for the federal hunt so it was too late for BLM to consider the changes ADF&G was making to Nelchina herd management. Then in 2023, communication did happen earlier, but multiple BLM staff reached out to area/regional ADF&G staff, so it was uncertain about who oversaw the decision and attempt to educate them all on the same information.

While not wildlife related, another example of an issue ADF&G has had with a federal agency carrying out the requirements of a delegation of authority from the FSB is regarding the inconsistency with consultation between the federal in-season manager from the Yukon-Kuskokwim Delta National Wildlife and the ADF&G area biologists for the Kuskokwim River.

At times over the years conversations have been productive but more often than not when asked, our area biologists respond that they were told about the management actions or that the action taken is not what was discussed.