

August 31, 2023

## **Opposition to moving Office of Subsistence Management (OSM)**

Dear Senator Murkowski:

As the leading fish and wildlife conservation organizations in Alaska, we are writing to express our objection to moving the Office of Subsistence Management (OSM), as recently proposed in the Committee Report on Interior Appropriations: *“The Committee supports a transfer of the Office of Subsistence Management from the Service to the Office of the Secretary. In addition, \$2,835,000 is included to reflect the transfer of the Office of Subsistence Management from the Fish and Wildlife Service.”* We request you immediately rescind this language because the proposed move is not consistent with the Alaska National Interest Lands Conservation Act (ANILCA) or the interests of rural Alaskans:

### **1. Moving OSM to Office of the Secretary of the Interior will reduce involvement by Alaskans.**

In ANILCA Sec. 801(5), Congress made a public interest finding that *“an administrative structure be established for the purpose of enabling rural residents who have a personal knowledge of local conditions and requirements to have a meaningful role in the management of fish and wildlife and of subsistence uses on the public lands in Alaska.”* OSM’s biological and anthropological expertise is drawn from all four federal land agencies and housed in Fish and Wildlife Service (FWS), which coordinates with Alaskans through the Regional Advisory Councils (RAC) process to assure participation by rural residents, and to provide data and expert analysis on subsistence uses and conservation of populations to the Federal Subsistence Board in regulating subsistence uses of fish and wildlife. Under the current system, decisions are driven by the recommendations of local residents serving on RACs, and local residents are able to interact with the state and federal biologists as well as the Board members. Moving OSM from FWS to oversight by political appointees in the Secretary’s Office will not improve involvement of rural residents in fish and wildlife harvest decisions.

### **2. Moving OSM will increase political intervention and influence of politicians and solicitors with political agendas.**


In ANILCA Secs. 801(1) and (4), Congress committed *“to protect and provide the opportunity for continued subsistence uses on the public lands by Native and non-Native rural residents”*. ANILCA is intentionally race-neutral. Congress recognized a fish and wildlife harvest preference based on race would create a *“have’s and have-not’s”* environment within remote Alaska communities where cultural and economic survival is community based, not ethnic. We understand that the proposed move of OSM to the Office of Secretary was a compromise, to allow a movement but not to the Bureau of Indian Affairs. But the proposed move to BIA would have violated ANILCA, and Congress has no reason to compromise. Moving OSM to anywhere that increases political influence, oversight by solicitors, and/or involvement of the BIA fails to recognize there are no treaties with Tribes, the Alaska Native Claims Settlement Act of 1971 extinguished aboriginal rights, and rural Alaska communities have a long history of movement and intermarriage among Natives and non-Natives. In fact, over half of the people who live in rural Alaska and qualify as federal subsistence users are non-Native. Moving OSM will increase politically motivated oversight and race-based divisions, not improve opportunities for subsistence by rural residents.

We also note that if Congress has *“\$2,835,000”* lying around to allocate to the federal subsistence program, those funds should be distributed according to the needs of OSM and the State of Alaska in monitoring the health of fish and wildlife populations in order to sustainably allocate those resources. Subsistence uses are dependent upon conservation of the fish and wildlife resources, and the agencies have many data needs.

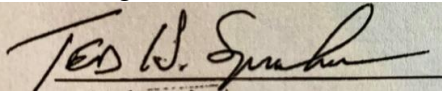
Spending that money to relocate a bureaucracy farther away from the affected public and responsible agencies would simply be irresponsible and without long term political gain.

We urge you to reconsider the proposed move of the Office of Subsistence Management and allocate resources in a manner that upholds the involvement of rural residents, facilitates sustainable subsistence practices and the intent of ANILCA Title VIII that Congress passed into law.

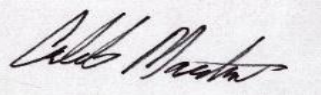
Thank you for your attention to this matter.



Alaska Chapter Safari Club International  
John Sturgeon, President



Alaska Kenai Chapter Safari Club International  
Ted Spraker, President



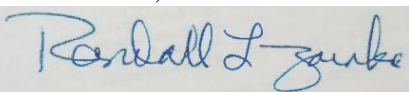
Alaska Outdoor Council  
Caleb Martin, Executive Director



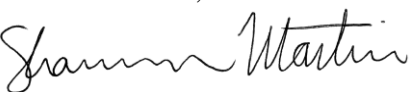
The Alaska Wild Sheep Foundation  
Kevin Kehoe, President



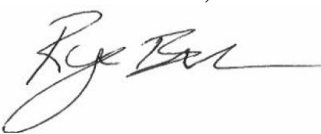
Alaska Professional Hunters Association  
Sam Roher, President



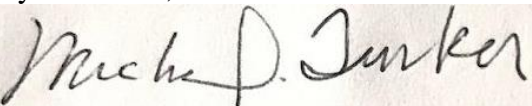
Alaska Trappers Association  
Randall Zarnke, President



Kenai Sportfishing Association  
Shannon Martin, Executive Director



Territorial Sportsmen Association  
Ryan Beason, President



Alaska Wildlife Conservation Association  
Mike Tinker, President

A handwritten signature in blue ink that reads "Jennifer S. Yuhas". The signature is written in a cursive, flowing style.

Outdoor Heritage Foundation of Alaska  
Jennifer Yuhas, Executive Director