

**Alaska Native Caucus of the Alaska Migratory Bird Co-Management Council:  
Additional comments regarding Proposal 41 to Exempt Rural Subsistence Hunters from the Requirements for  
Obtaining a Waterfowl Conservation Tag**

As the Co-Chair of the Alaska Migratory Bird Co-Management Council, I would like to provide some background history of the State duck stamp issue and Proposal 41 that was submitted for your consideration by the Alaska Native Caucus of the AMBCC.

The AMBCC worked for approximately 14 years with the United States Congress to successfully exempt rural residents of Alaska from the requirement of purchasing a federal Duck Stamp for the federal spring and summer subsistence hunt.

Requiring rural residents to purchase a state duck stamp (Waterfowl Conservation Tag) for the Spring/Summer subsistence hunt doesn't make sense to us rural residents. This is a Federal Hunt and for some residents being required to purchase a State duck stamp for \$10.00 can and oftentimes does create a hardship for people to decide whether to buy a box of shotgun shells to provide food for their family or buy a State duck stamp to comply with the law. Our Spring/Summer subsistence hunt is our customary and traditional harvest season to provide food for our families and is not managed by the State of Alaska.

Upon reviewing the ADF&G and Department of Law comments on Proposal 41, both of which suggest this proposal exceeds the authority of the Board of Game, the Alaska Native Caucus of the AMBCC would like to remind the Board of Game that the Alaska Legislature directs the Alaska Board of Game to exempt the requirement of a state waterfowl conservation tag for waterfowl hunting in areas of the state not likely to benefit from (1) the acquisition of wetlands important for waterfowl (AS 16.05.130(b)(2)), (2) waterfowl related projects approved by the commissioner (AS 16.05.130(b)(3)), or (3) the administration of the state's waterfowl conservation program (AS 16.05.130(b)(4)).

While the Native Caucus of the Alaska Migratory Bird Co-Management Council recognizes that approval of this proposal would reduce the funding made available to the department, we represent vast regions throughout the state, as well as the largest private landowners in the United States. These lands, along with federal conservation units, provide vast amounts of waterfowl habitat that are largely protected from development. We also contend that requiring a state duck stamp during federal spring and summer seasons in order to support ADF&G projects approved by the commissioner and the administration of the state's waterfowl conservation program do not directly benefit rural residents during the federal spring and summer subsistence migratory bird hunting seasons.

In regards to the Harvest Information Program (HIP) and the concern that information would be lost if state duck stamps were not required, the AMBCC manages a harvest assessment program through the ADF&G Division of Subsistence. The program surveys five regions (the highest harvest areas) annually documenting their take of waterfowl and other migratory birds. This information is collected for both the spring and summer season, as well as the fall-winter season.

If the board determines that passage of Proposal 41 is outside the board's authority, I would respectfully ask the board to consider writing a letter to the Alaska State Legislature requesting rural Alaska residents to no longer require a State duck stamp for a spring/summer federal hunt.

Thank you.

Gayla Hoseth  
Co-Chair  
Alaska Migratory Bird Co-Management Council