

**From:** [Susan A](#)  
**To:** [Senate Resources](#); [Senate Finance Committee](#)  
**Subject:** SB 97 Public Testimony  
**Date:** Monday, March 10, 2025 2:31:55 PM

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## Public Testimony on Senate Bill 97

Alaska State Legislature

Date: March 10

Subject: Opposition to SB 97 – Big Game Guide Concession Area Permit Program

Presented by: Susan Allmeroth, Myself

Senate Bill 97 proposes a regulatory framework for a Big Game Guide Concession Area Permit Program that fundamentally reshapes the management of Alaska's wildlife resources. While its stated goals include conservation, professional oversight, and conflict reduction, this bill raises serious concerns regarding subsistence rights, corporate favoritism, and the marginalization of Indigenous and rural communities. SB 97 threatens Alaskans' ability to practice subsistence hunting, which is legally protected under federal and state law, and aligns with the broader goals of Project 2025, a policy initiative aimed at consolidating federal control over land and natural resources while undermining Indigenous rights.

### 1. Loopholes Favoring Corporate Outfitters Over Local and Indigenous Hunters

The proposed concession system limits the number of big game guides by issuing exclusive permits, making it difficult for local and Indigenous guides to compete. Instead, wealthy corporate hunting lodges and outside interests—who can afford high permit fees and navigate bureaucratic hurdles—will dominate the system.

Under AS 38.05.021(c), concession permits are issued through a "competitive process", yet the bill explicitly states that bids cannot be awarded solely on the highest offer (Sec. 3(c)). This vague language creates loopholes allowing subjective decision-making, where government agencies may favor large, well-connected commercial operators while pushing out small, community-based subsistence guides.

### 2. Overlapping Jurisdictional Authority and Regulatory Burdens

SB 97 introduces bureaucratic overlap between the Big Game Commercial Services Board, the Board of Game, the Department of Fish and Game, and the Department of Natural Resources. These agencies are already responsible for issuing hunting permits, enforcing game laws, and managing conservation efforts. Adding another layer of regulation further complicates the permitting process and could disproportionately affect independent subsistence hunters, who may lack the resources to navigate this system.

### 3. Violation of Constitutional and Treaty Protections for Subsistence Hunting

SB 97 conflicts with both state and federal legal protections for subsistence hunters, particularly those outlined in:

The Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. § 3113), which guarantees rural Alaskans priority access to subsistence resources.

Tribal sovereignty rights under federal treaties and court decisions, which recognize Indigenous peoples' authority over their traditional lands and hunting grounds (Cohen, 2019).

By restricting access to hunting concessions, SB 97 erodes Indigenous food sovereignty and prioritizes commercial hunting operations over subsistence rights, violating ANILCA's mandate to protect rural Alaskans' way of life.

#### 4. Environmental Risks and the Threat of Overhunting

SB 97 establishes a 10-year permit system (Sec. 3(c)), encouraging long-term commercial exploitation of big game resources without requiring periodic environmental reviews. The bill fails to outline specific conservation metrics, such as species population studies, habitat impact assessments, or climate change considerations—which are necessary to ensure sustainable wildlife management.

Additionally, with fewer independent guides operating due to restrictive licensing, fewer observers will be monitoring for illegal poaching, overhunting, and unethical hunting practices. Commercial guides operating under high financial pressure may push ecological limits in order to satisfy wealthy clients, further damaging Alaska's ecosystems.

#### 5. SB 97's Role in Project 2025's Larger Agenda

This bill aligns with the goals of Project 2025, a policy blueprint aimed at consolidating federal and state power over land and resource management, reducing environmental regulations, and limiting Indigenous and rural communities' access to public lands (The Heritage Foundation, 2023). By shifting control of big game hunting to a centralized, exclusive permit system, SB 97 effectively:\*\*

Privatizes access to wildlife resources, allowing only select commercial operators to benefit.

Disenfranchises local and Indigenous subsistence hunters, forcing them into bureaucratic and financial barriers.

Weakens environmental oversight, making it easier for politically connected groups to extract natural resources without proper accountability.

Conclusion: SB 97 Must Be Rejected

SB 97 is not a conservation bill—it is a land grab that prioritizes commercial hunting over subsistence rights, environmental protection, and rural community access. If passed, this legislation will further erode Indigenous food sovereignty, disproportionately harm rural Alaskans, and contribute to a broader agenda of resource consolidation under Project 2025.

I urge lawmakers to reject SB 97 in favor of policies that prioritize subsistence rights, environmental stewardship, and equitable access to Alaska's wildlife resources.

Susan Allmeroth

Two Rivers

Myself

#### References

Cohen, F. (2019). Handbook of Federal Indian Law. LexisNexis.

The Heritage Foundation. (2023). Project 2025: Presidential Transition Project. Retrieved from [Insert URL]

United States Congress. (1980). Alaska National Interest Lands Conservation Act (ANILCA), 16 U.S.C. § 3113.

United States Supreme Court. (1999). Alaska v. Native Village of Venetie Tribal Government, 522 U.S. 520.

## Expanded Public Testimony on Senate Bill 97

Subject: Opposition to SB 97 – Big Game Guide Concession Area Permit Program  
Presented by: Susan Allmeroth

Senate Bill 97 (SB 97) proposes a regulatory framework for a Big Game Guide Concession Area Permit Program, which would significantly alter the management of Alaska's wildlife resources. While its stated goals include conservation, professional oversight, and conflict reduction, this bill raises serious concerns regarding subsistence rights, corporate favoritism, environmental mismanagement, and ethical violations in the regulation of hunting permits.

More alarmingly, SB 97 aligns with the broader goals of Project 2025, a policy initiative designed to consolidate federal and state power over land and natural resources while weakening environmental regulations and dismantling Indigenous and rural Alaskans' access to subsistence resources. The language of the bill creates a system of exclusion that benefits commercial operators and restricts local and Indigenous participation in traditional hunting practices.

This testimony will comprehensively address the legal, environmental, and ethical failures of SB 97, demonstrating how it directly threatens subsistence hunting, wildlife conservation, and community autonomy while fitting into a larger framework of resource privatization.

### 1. Legal Violations: SB 97 Undermines Federal and State Protections for Subsistence Rights

SB 97 violates multiple legal frameworks established to protect Alaskans' access to subsistence hunting, including:

#### A. The Alaska National Interest Lands Conservation Act (ANILCA) (16 U.S.C. § 3113)

ANILCA guarantees that rural Alaskans, particularly Indigenous communities, have priority access to subsistence hunting.

By restricting hunting access through a concession system that favors large-scale commercial outfitters over local hunters, SB 97 directly violates ANILCA's mandate to protect rural communities' way of life.

#### B. Tribal Sovereignty and Treaty Rights

Indigenous communities in Alaska have historical and treaty-backed claims to hunting and fishing rights, upheld by federal court rulings (Cohen, 2019).

SB 97 imposes state-level restrictions that override these protections, disenfranchising Indigenous communities who rely on subsistence hunting not just for survival but as a cultural and spiritual practice.

### C. Constitutional Issues and Unequal Access

SB 97 creates a pay-to-play system by requiring expensive concession permits for guiding, which effectively excludes lower-income, rural, and Indigenous hunters who cannot compete with well-funded commercial hunting outfits.

The bill's vague competitive selection criteria (Sec. 3(c)) introduce a risk of arbitrary decision-making and potential favoritism, violating principles of equal access and due process under both the Alaska and U.S. Constitutions.

### D. Overreach and Bureaucratic Overload

The bill introduces redundant regulation, creating jurisdictional conflicts between existing entities like the Big Game Commercial Services Board, the Board of Game, the Department of Fish and Game, and the Department of Natural Resources.

The additional bureaucracy does not improve conservation but instead makes it harder for subsistence hunters to comply with shifting regulations, increasing the risk of criminalizing traditional practices.

## 2. Environmental Risks: SB 97 Prioritizes Commercial Exploitation Over Conservation

SB 97 does not include strong environmental protections and, instead, introduces mechanisms that could accelerate overhunting and wildlife depletion.

### A. Long-Term Exploitation Without Review

The bill establishes 10-year concession permits (Sec. 3(c)), allowing commercial operators long-term, unchecked control over specific hunting areas.

There is no requirement for periodic environmental impact reviews, meaning that if species populations decline due to climate change or other pressures, concession holders will still retain their permits.

### B. Increased Risk of Overhunting and Poaching

Fewer independent guides will be in operation due to permit restrictions, leading to less oversight on illegal poaching and unethical hunting practices.

Commercial guides, under financial pressure to maximize profits, may push ecological limits by catering to high-paying clients and targeting trophy species without conservation safeguards.

### C. Lack of Climate Resilience Strategies

SB 97 does not account for climate-related disruptions to wildlife migration and population health.

Moose, caribou, and bear populations are already impacted by habitat shifts, changing food sources, and rising temperatures. This bill fails to introduce adaptive management strategies to respond to these ecological challenges.

### 3. Ethical Failures: The Commercialization of Hunting at the Expense of Local Communities

SB 97 shifts the focus of Alaska's wildlife management from community subsistence and conservation to corporate profit and exclusivity.

#### A. Exclusion of Local and Indigenous Hunters

The concession system reduces the number of guides allowed to operate, leading to consolidation of permits in the hands of wealthy commercial operators.

Rural and Indigenous hunters, who have traditionally provided guiding services in alignment with cultural and environmental sustainability, will be locked out of their own lands and traditions.

#### B. Disregard for Cultural and Spiritual Significance of Hunting

Hunting in Alaska is not just a sport—it is a deeply rooted cultural practice for many Indigenous communities.

By treating wildlife as a commodity for elite, high-paying clients, this bill devalues the spiritual and communal significance of hunting.

### 4. Project 2025's Role in Pushing SB 97's Agenda

SB 97 is not an isolated piece of legislation—it is part of a larger pattern of resource privatization and land control policies that align with Project 2025's vision for the U.S.

#### A. Project 2025 and the Privatization of Public Lands

Project 2025 aims to weaken public land protections, placing more control in the hands of state governments and private interests (The Heritage Foundation, 2023).

By implementing an exclusive concession system, SB 97 serves this exact goal—reducing public access to hunting resources while granting commercial control to select private operators.

#### B. Restricting Indigenous and Rural Access to Natural Resources

Project 2025 has advocated for rolling back federal protections on Indigenous land and subsistence rights, arguing for greater state control over land management.

SB 97 mirrors these objectives by creating financial and bureaucratic barriers that disproportionately harm Indigenous subsistence hunters.

### C. Weakening Environmental Protections in Favor of Corporate Interests

Project 2025 calls for deregulating environmental protections to promote resource extraction and commercial exploitation.

SB 97 fits within this framework by prioritizing commercial hunting interests over conservation and failing to mandate sustainability measures.

#### Conclusion: SB 97 Must Be Rejected

SB 97 is not a conservation bill—it is a privatization scheme that threatens subsistence rights, environmental sustainability, and community-based wildlife management. If passed, this legislation will further erode Indigenous food sovereignty, disproportionately harm rural Alaskans, and contribute to Project 2025’s broader efforts to consolidate control over natural resources.

I urge lawmakers to reject SB 97 in favor of policies that:

Protect subsistence hunting rights under federal and state law.

Promote community-led conservation efforts over corporate hunting concessions.

Ensure that environmental sustainability is central to Alaska’s wildlife management strategy.

For government to work for us all, we must approach it from the bottom up, only then will we develop a system that works for all of us. We live in a vast and expansive state with many different territories and peoples, we are not all treated as equal. I employ you to do better for the next generations.

Susan Allmeroth

Two Rivers

Myself

#### References

Cohen, F. (2019). Handbook of Federal Indian Law. LexisNexis.

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