



MATANUSKA-SUSITNA BOROUGH

Fish & Wildlife Commission

Planning and Land Use Department

Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

<https://www.matsu.gov> • planning@matsu.gov

May 18, 2026

RE: HB 321 – An Act relating to state refuges, sanctuaries, and fish and game critical habitat areas; relating to the hunting of brown bear; and providing for an effective date.

Dear Representative Josephson,

The Mat-Su Borough Fish and Wildlife Commission (FWC) provides this letter of opposition to Alaska House Bill 321 (HB 321), particularly due to its potential for significant negative consequences for the Matanuska-Susitna Borough (MSB). While the bill aims to standardize wildlife area classifications and improve statutory clarity, the FWC's analysis of HB 321 identified several items that could negatively impact Mat-Su residents, local governance, and long-term access to public lands.

The bill's language to prohibit the use of firearms poses land use risks to MSB residents and infringes on our rights protected under the United States and Alaska Constitutions. While intended to address unsafe firearm discharge and other hazards, the FWC believes this could allow agencies to close portions of wildlife refuges without legislative oversight and infringe on inherent protected rights to bear and use firearms.

The Goose Bay, Palmer Hay Flats, and Susitna River Refuges are the primary areas of direct relevance to the MSB, and HB 321 proposes converting it into a state wildlife refuge while incorporating additional state-owned or future state-acquired lands into its boundaries. This automatic inclusion of future acquisitions without any requirement for MSB consultation creates uncertainty for land-use planning and for residents who rely on consistent access to these high-use areas. As a result, we have significant concerns about how future boundary changes may interfere with local land use planning.

HB 321 also appears to shift authority away from local communities and toward state agencies. By elevating habitat protection as the primary statutory purpose of wildlife areas, HB 321 may enable ADF&G to restrict access through regulation rather than legislative action. For a rapidly growing region like the MSB where residents depend on accessible hunting, fishing, and recreation, this shift raises legitimate concerns about long-term access. Access to public lands is central to our community identity and outdoor culture, thus the potential for regulatory closures by unelected officials is particularly concerning.

Additionally, HB 321 includes statutory brown bear hunting closures in the McNeil River and Katmai regions. Although these areas lie outside the MSB boundary, the precedent is relevant. Our analysis concludes that these closures expand no-hunt zones in ways that are difficult to reverse and prioritize tourism over hunting opportunity. This raises concerns about how similar statutory restrictions could be applied elsewhere in the future, including within or near MSB wildlife areas.

Providing Outstanding Borough Services to the Matanuska-Susitna Community

Finally, the bill's prohibition on personal watercraft in certain wildlife refuges may conflict with a recent Alaska Supreme Court decision and could limit Alaska Department of Fish and Game's (ADF&G) ability to conduct habitat restoration work. This contradiction suggests that HB 321 may unintentionally hinder the very conservation efforts it seeks to establish.

In summary, while HB 321 aims to improve clarity and strengthen conservation, it introduces substantial risks for the MSB, including infringement on inherent rights, reduced local control, expanded unelected agency authority, uncertain impacts on access, and potential conflicts with existing management practices. These concerns warrant careful reconsideration of this bill. For these reasons, I respectfully urge you to significantly amend HB 321 to ensure that Mat-Su residents and the local government remain a strong element in the management of wildlife areas in the MSB.

We are aware that HB 321 is currently being amended. The comments in this letter are based on the draft of the legislation Mr. Meehan sent to the MSB Planning & Land Use Department on March 16. We will review the amended bill and may provide a follow-up response as needed. Thank you for bringing this bill to our attention and for the opportunity to communicate our concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pete Probasco', with a long horizontal line extending to the right.

Pete Probasco
Chair