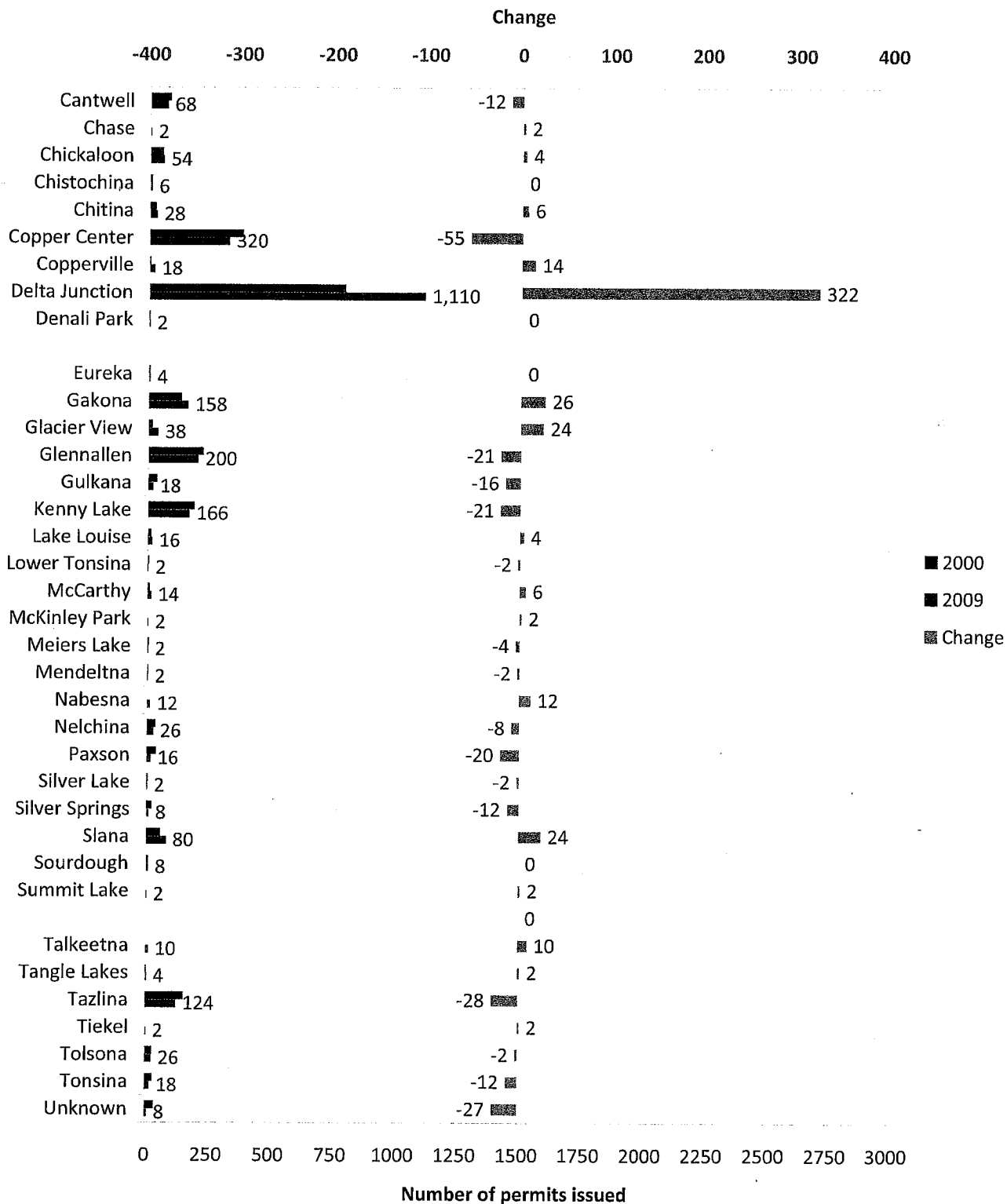
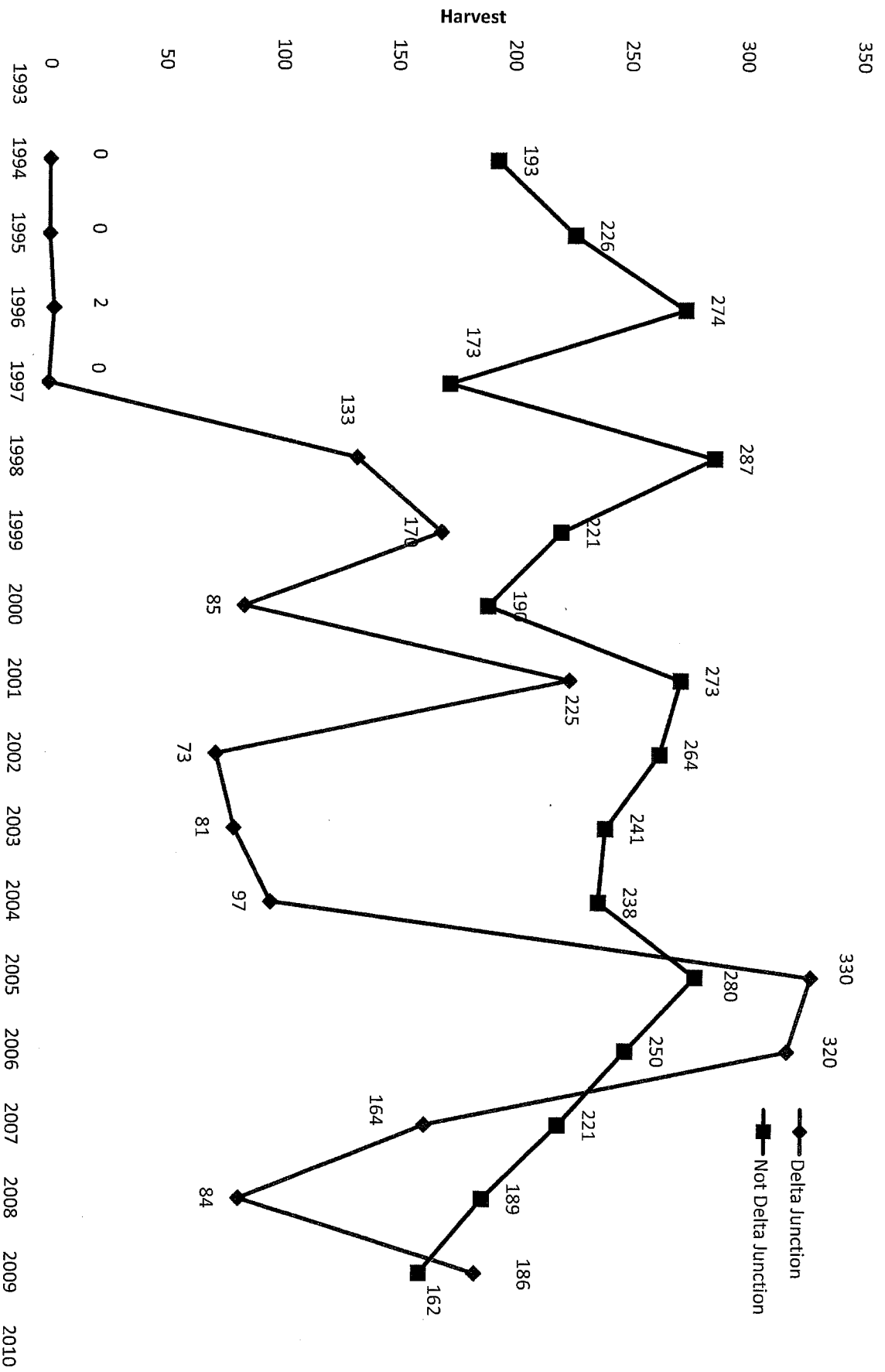


RC-35

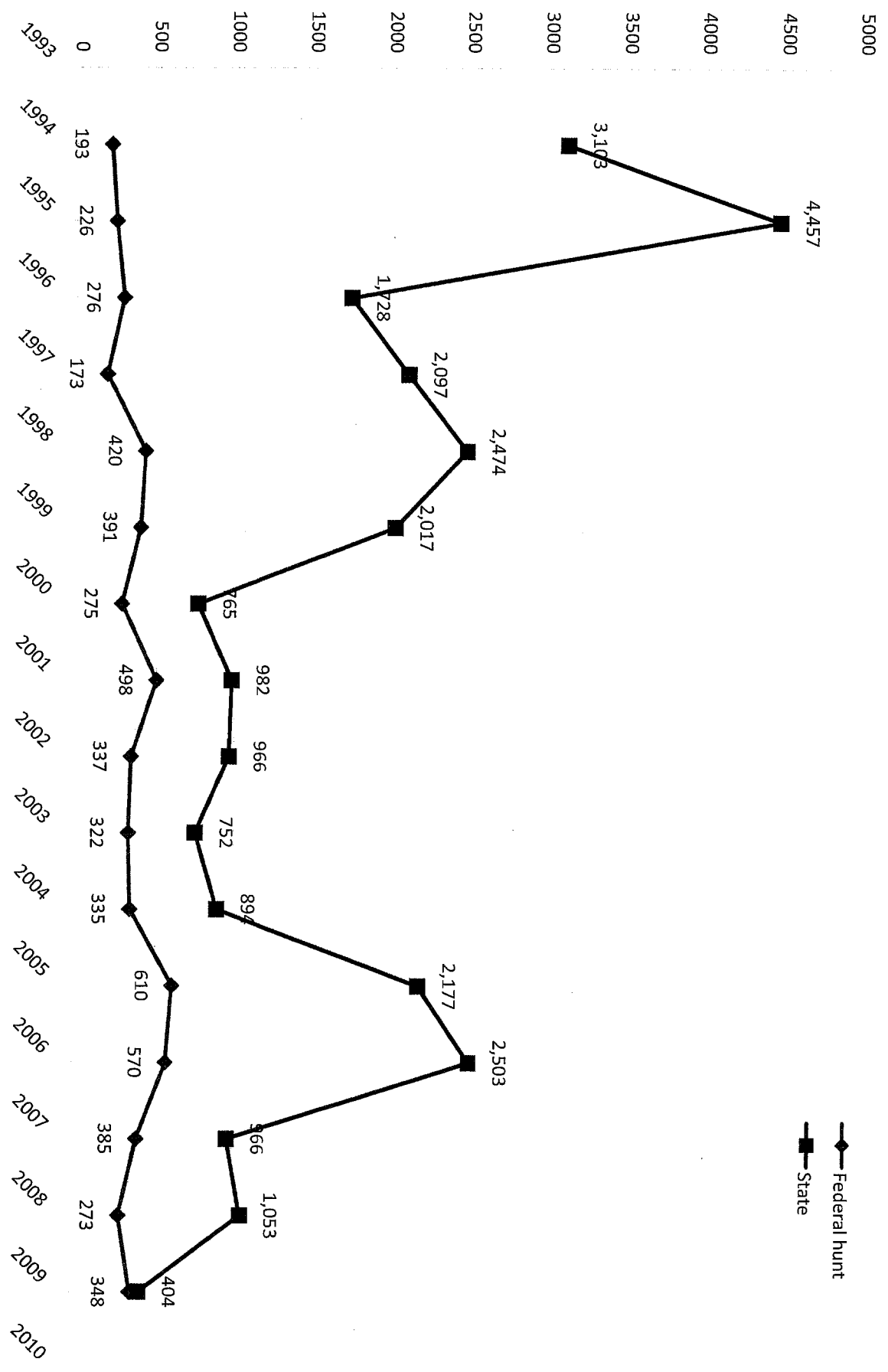
## GMU 13 Nelchina caribou federal subsistence hunter residency



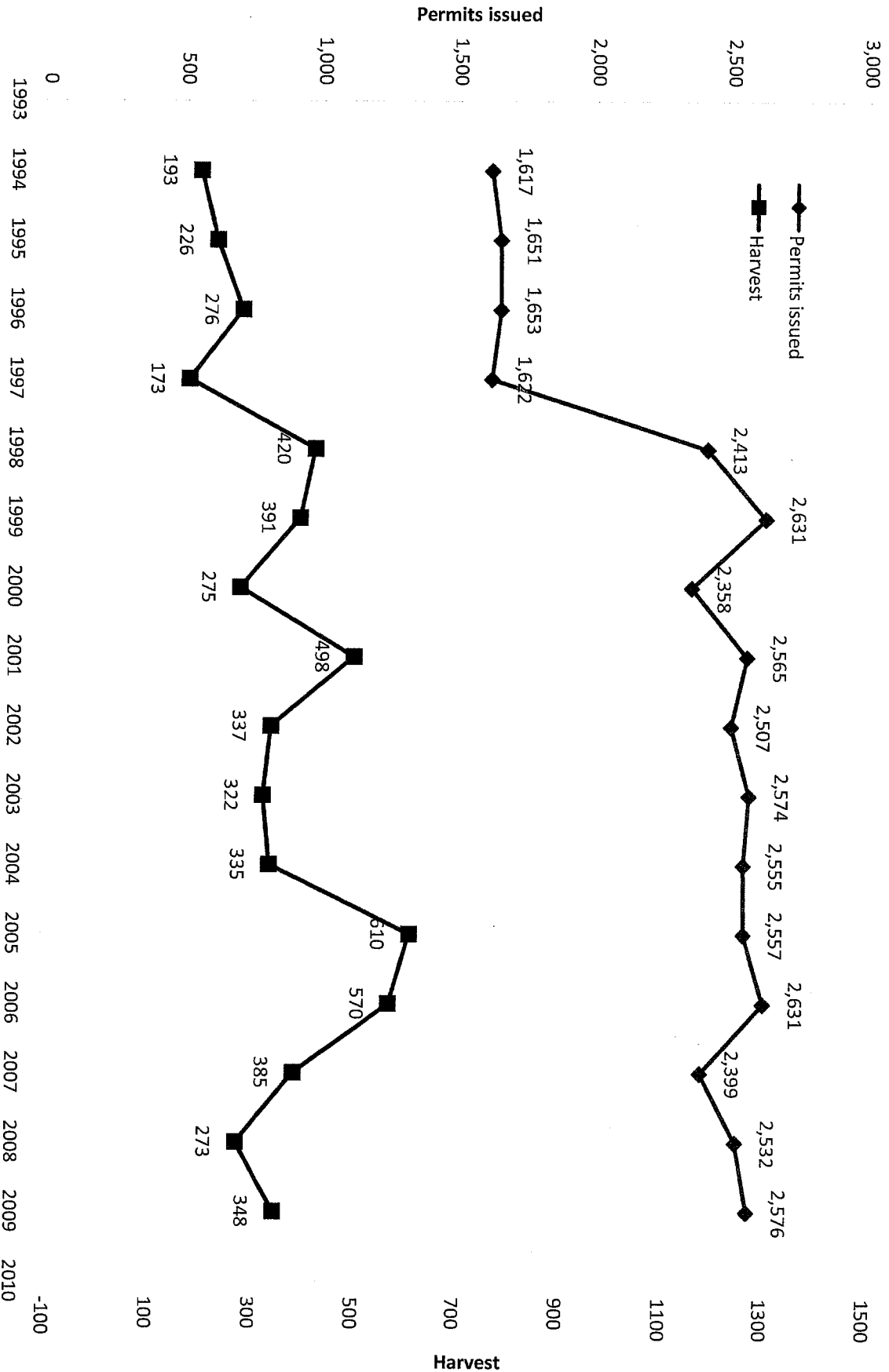
# Unit 13 Federal Nelchina caribou harvest by Delta Junction comparison



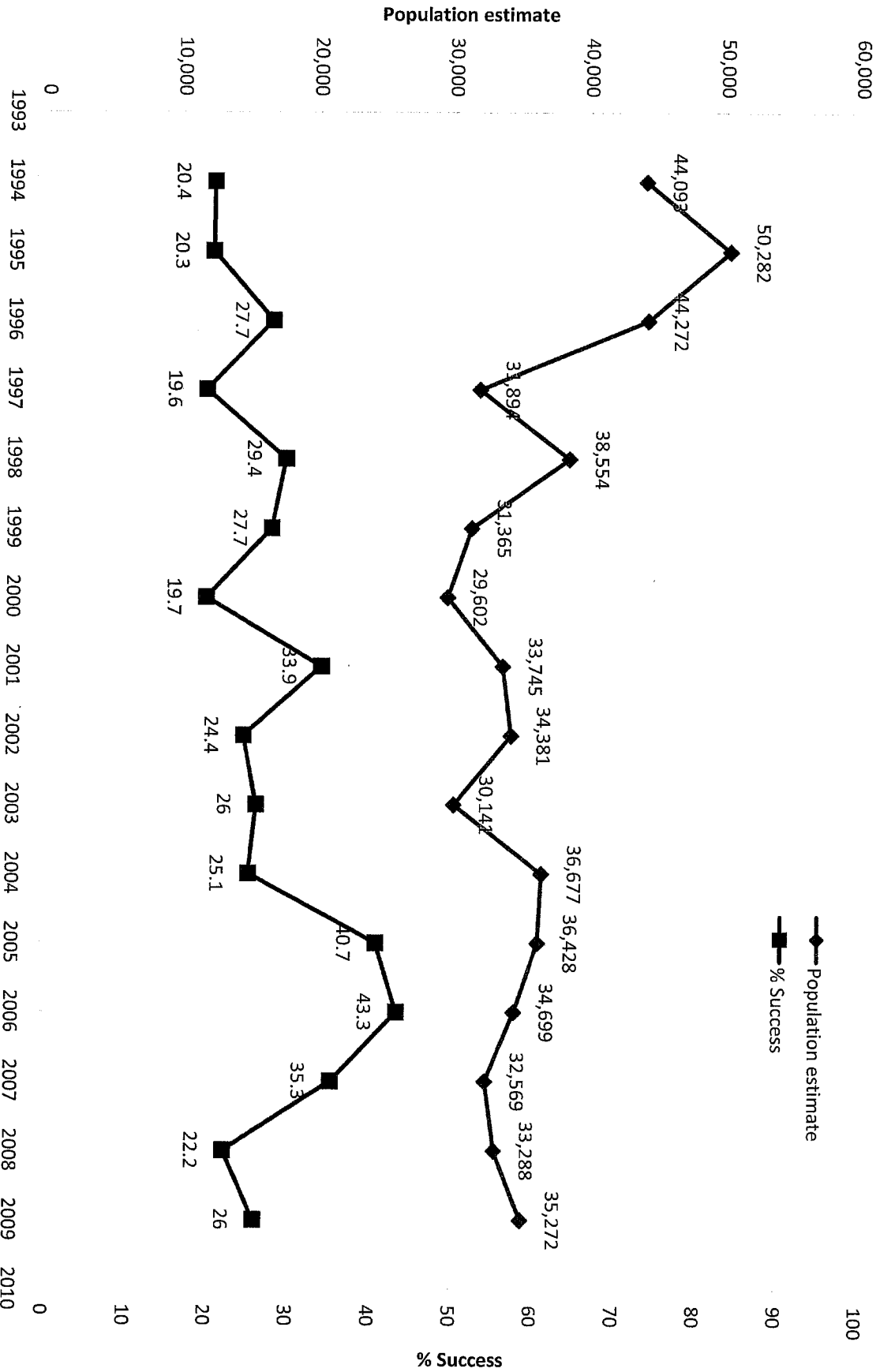
# Unit 13 Nelchina caribou harvest



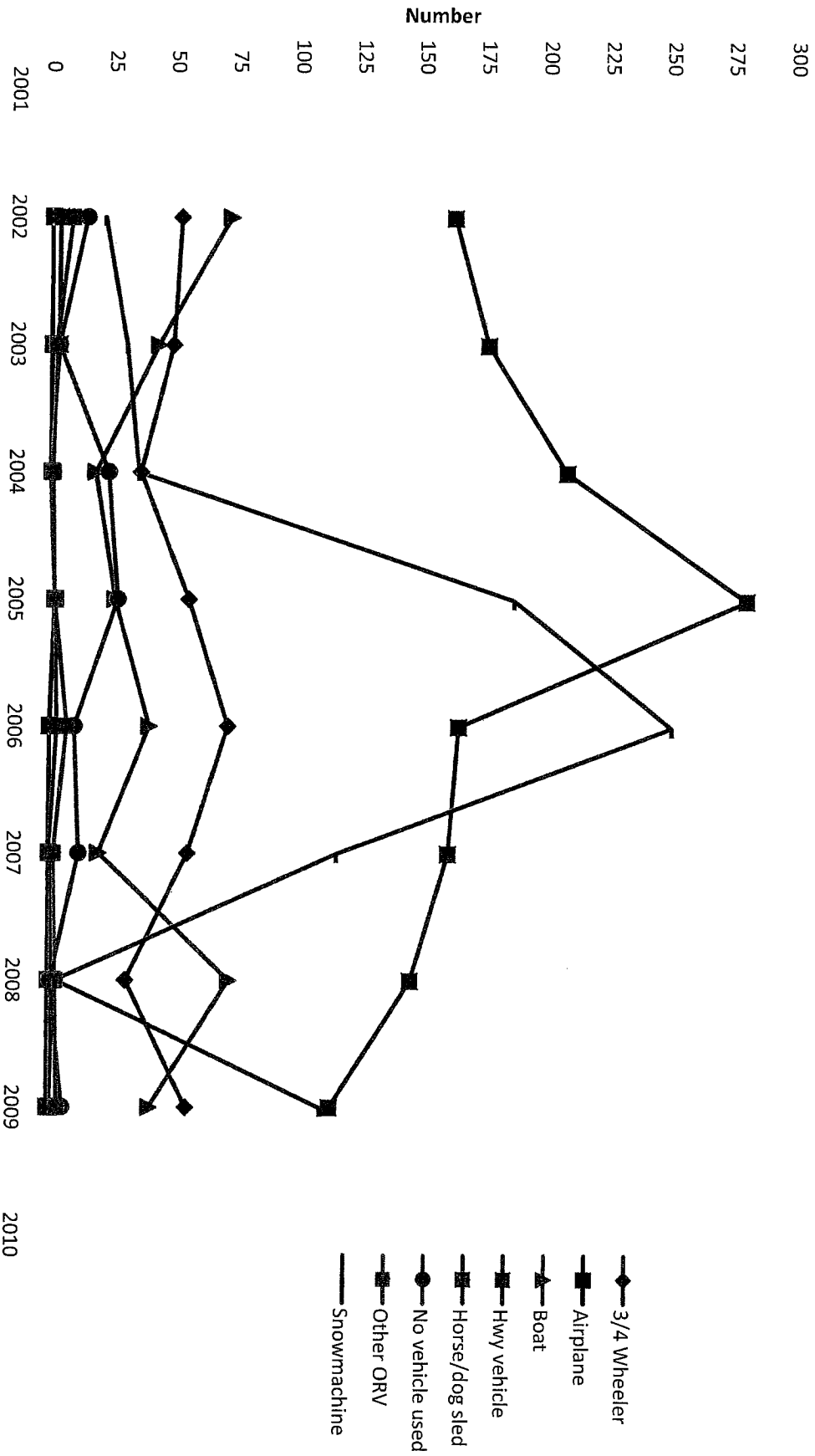
# GMU 13 Federal Nelchina caribou hunt



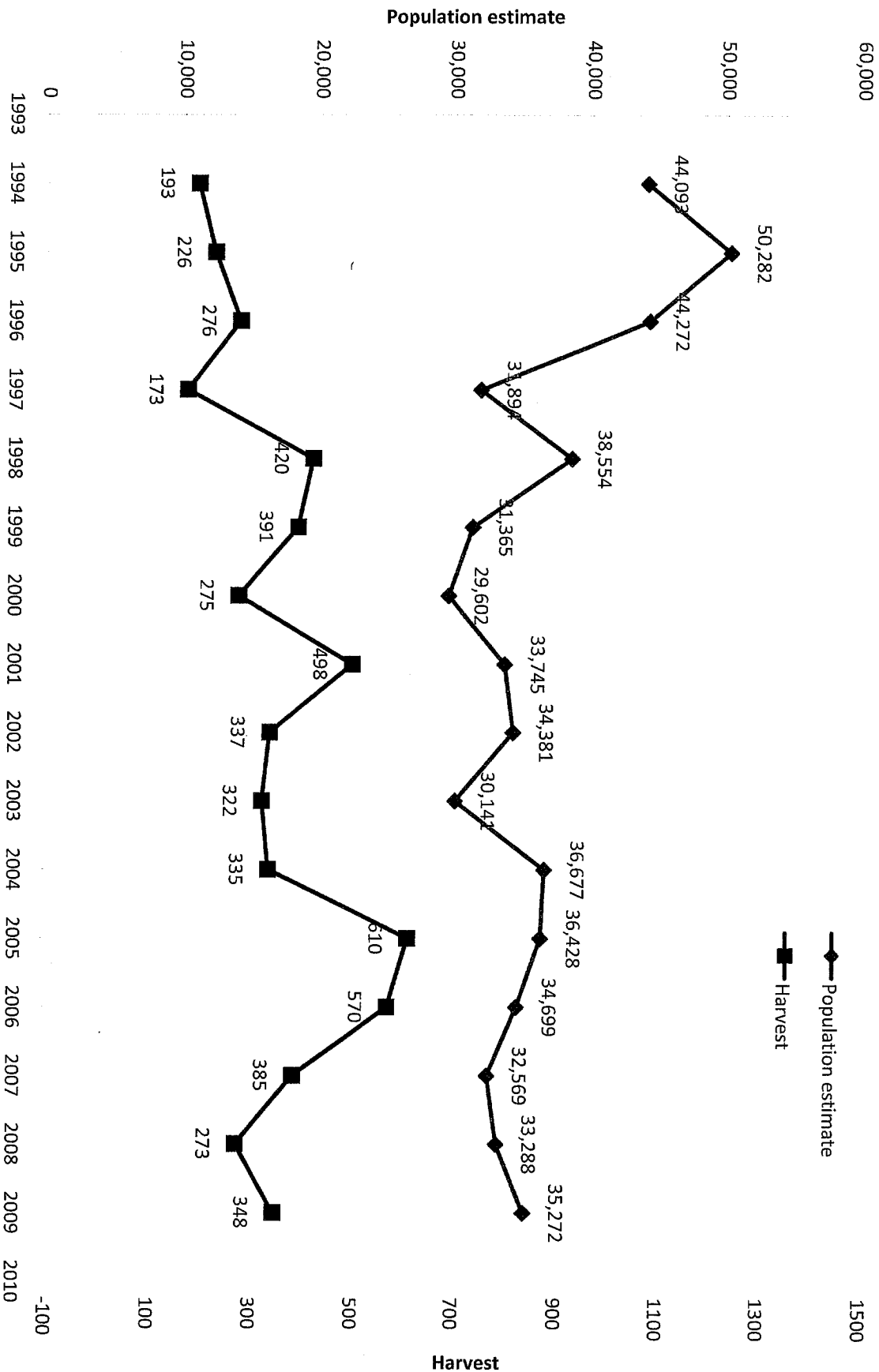
# GMU 13 Federal Nelchhina caribou hunt



## 2009 Federal Nelchina caribou hunt transportation used for harvest taken



# GMU 13 Federal Nelchina caribou hunt

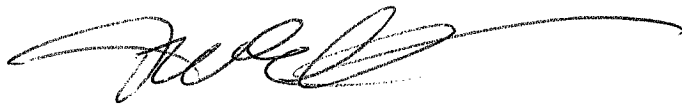


RC 36

I am writing in opposition to the Board of Game's most current proposal to expand the use trapping as a management tool for black bears and grizzly bears, including the taking of sows with cubs, cubs, and baiting and foot-snaring of bears.

The ADF&G's predator control program, sadly, is not scientifically-based, is tarnishing Alaska's great hunting heritage, and advocates exceedingly unsportsmanlike activities that violate widely accepted fair-chase practices of hunting.

Under the Palin-Parnell administrations, ADF&G, especially with regard to predator control, has become excessively politicized. Management of Alaska's game ought be driven by science, not politics.



James W Elliott



From April Warwick  
5716 Kennyhill Dr.  
Anch, AK 99504  
338-7777

RC 37

TO Board of Game

Hello:

I am here at the Board of Game Meeting to be a voice for Alaska's wildlife. I believe all of our wildlife would benefit if the Board of Game would stop managing them. Many of your management decisions lead to death & suffering for animals. I would fire all of you because you do such a bad job. Instead of making decisions to preserve nature you work to destroy it. None of you represent me and my concern for Alaska's wildlife. I have no faith that you will listen to people who want to preserve wildlife but I must try. I oppose Proposition 31, 34 + 36. I think bear trapping + snaring should be illegal - it is unsafe for children, dogs, other animals + people. Stop killing mother bears and their cubs. End all Bear Trapping. End the Predator Control Program. Stop the senseless killing. Manage Humans - leave the wildlife alone. Please do not accept Propositions 31, 34 + 36.

Thank-you,

April Warwick

RC 38

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# Alaska Outdoor Council



and



## Alaska Fish & Wildlife Conservation Fund

310 K Street, Suite 200  
310 K Street, Suite 200, Anchorage, Alaska 99501  
Phone: (907) 264-6645, Fax (907)264-6602  
E-mail: [aoc@alaskaoutdoorcouncil.org](mailto:aoc@alaskaoutdoorcouncil.org)  
Website: [www.alaskaoutdoorcouncil.org](http://www.alaskaoutdoorcouncil.org)

October 9, 2010

RE: Nelchina caribou and Bear Trapping Regulations  
October 2010 BOG -AOC comments

The Alaska Outdoor Council (AOC) is a coalition of 50 outdoor clubs representing over 10,000 Alaskans who hunt, trap, fish and recreate on public lands. AOC advocates for hunting regulations consistent with the "Common Use Clauses" enshrined in the Alaska State Constitution, Article 8, Section 3, 15, and 17.

**Proposal 28: Adopt an ANS for Nelchina caribou of 250 – 600.**

During "times of plenty" when predator/prey management has allowed herds to reach their population objectives codified in 5 AAC 92.108 AOC's Board of Directors supports the sharing of the harvestable surplus with all Alaskan residents who choose to make gathering a wildfood harvest part of their way of life. AOC and the majority of Alaskan hunters are willing to share in the harvest of Nelchina caribou through a registration or drawing permit system. ADF&G Subsistence Division has determined (RC 15) that the communal pattern of Nelchina caribou use has historically been less than 600. When the harvestable surplus exceeds that number the majority of Nelchina caribou hunters will willingly ask that their harvest not be included in the ANS to allow the Board to adopt regulations for a subsistence harvest under AS 16.05.258(b)(2), termed a **Tier I plus** hunt. This action would be consistent with ANS's previously adopted by the Board for other herds under 5 AAC 99.025(a), all of which are lower than the actual historic harvest and do not take into account all non-local harvest.

Article 8, Section 4. Sustained Yield. of the Alaska State Constitution allows the Board to adopt hunting regulations subject to preferences among beneficial uses. During “times of plenty” it would be beneficial to Alaskans who hunt to be able to share the harvestable surplus of a public resource.

Consistent with 5 AAC 99.025(c) there is sufficient historical harvest data and current land ownership in the Nelchina Basin that will allow the Board to determine that a normally diligent resident, who exhibits the characteristics associated with a communal use pattern, will have a reasonable expectation of success of taking a Nelchina caribou. AOC recommends that the Board articulate a clear basis on the record of why the requirements in AS 16.05.258(2)(A) are being met.

**Proposal 22. Adopt.** Not allowing hunters to harvest moose or caribou in other Game Management Area is an unnecessary and unwanted burden on any hunter.

**Proposal 23. Adopt.** Repeal the Athna CHP consistent with the Superior Court decision, Manning, et al v State, et al., 3KN-09-178CI. Also the Board should ask the legislature to repeal the authorizing statutes, AS 16.05.330(c). Subsistence permits should be issued on an individual bases, CHPs are fundamentally local-residency based. The Board should reexamine the proxy regulations to allow for a less restrictive distribution.

**Proposal 24. Amend and adopt.** The Board should consider all options to implement a registration, drawing, or a combination hunt regime that will allow for a wide distribution of hunting effort over as long a time frame as possible. A harvest management regime of the herd to achieve a sustainable population objective and a high harvest for human use should be the Board’s priority.

**Proposal 31. Adopt.** Effective predator management adopted by Board and implemented by the department has provided the “times of plenty” that allows the Board to provide a hunting opportunity for all Alaskans. Wolf predation needs to be restricted until Moose and Dall sheep populations reach levels that the habitat will sustain.

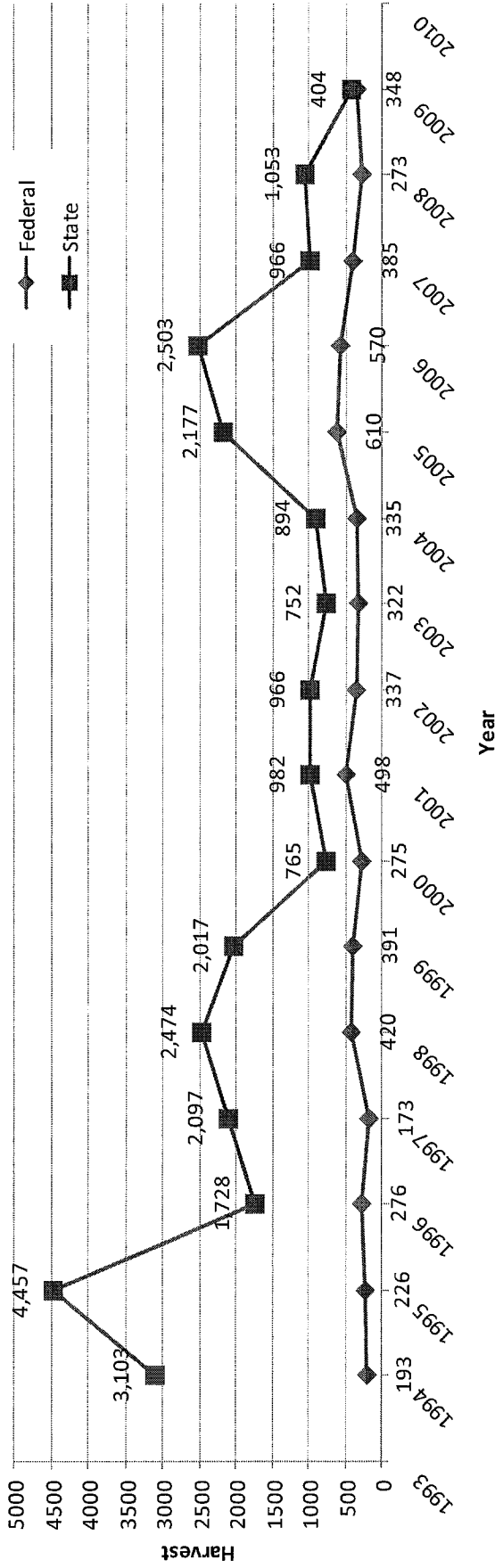
**Proposal 32. Adopt.** Conservation of muskox in GMU 26B is in the best interest of hunters and the State.

**Proposal 36. Adopt.** There is a harvestable surplus of black bear that is under utilized in many areas of the Interior and Southcentral Alaska. Plus black bear predation remains a factor limiting the recovery of game populations important for human consumption in GMU 12, 13, 15, 16, 19, 20, 21, and parts of 25.

AOC appreciates the efforts of the Board and department to manage game on a sustain yield bases to benefit all Alaskans. AOC staff and board members will be on hand for work sessions and during Board deliberations to answer question to further clarify AOC's positions on these timely regulatory issues.

Rod Arno, Executive Director AOC  
Cell phone (841-6849)

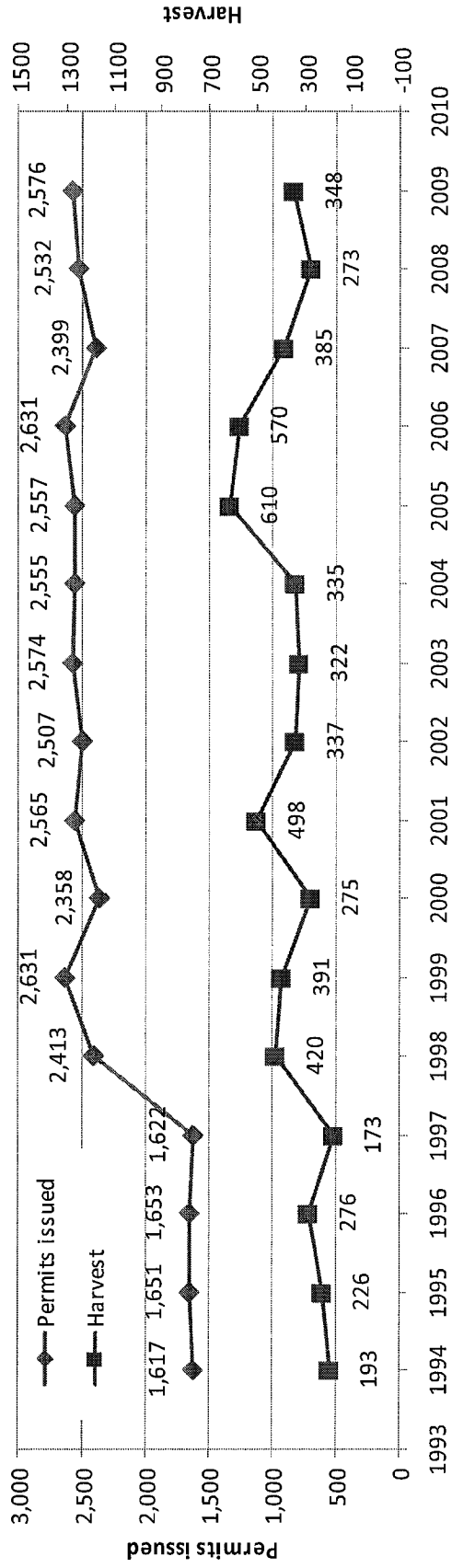
# Unit 13 Nelchina caribou harvest



RC 39

Information presented  
and provided by  
Merben Cebrian  
BLM

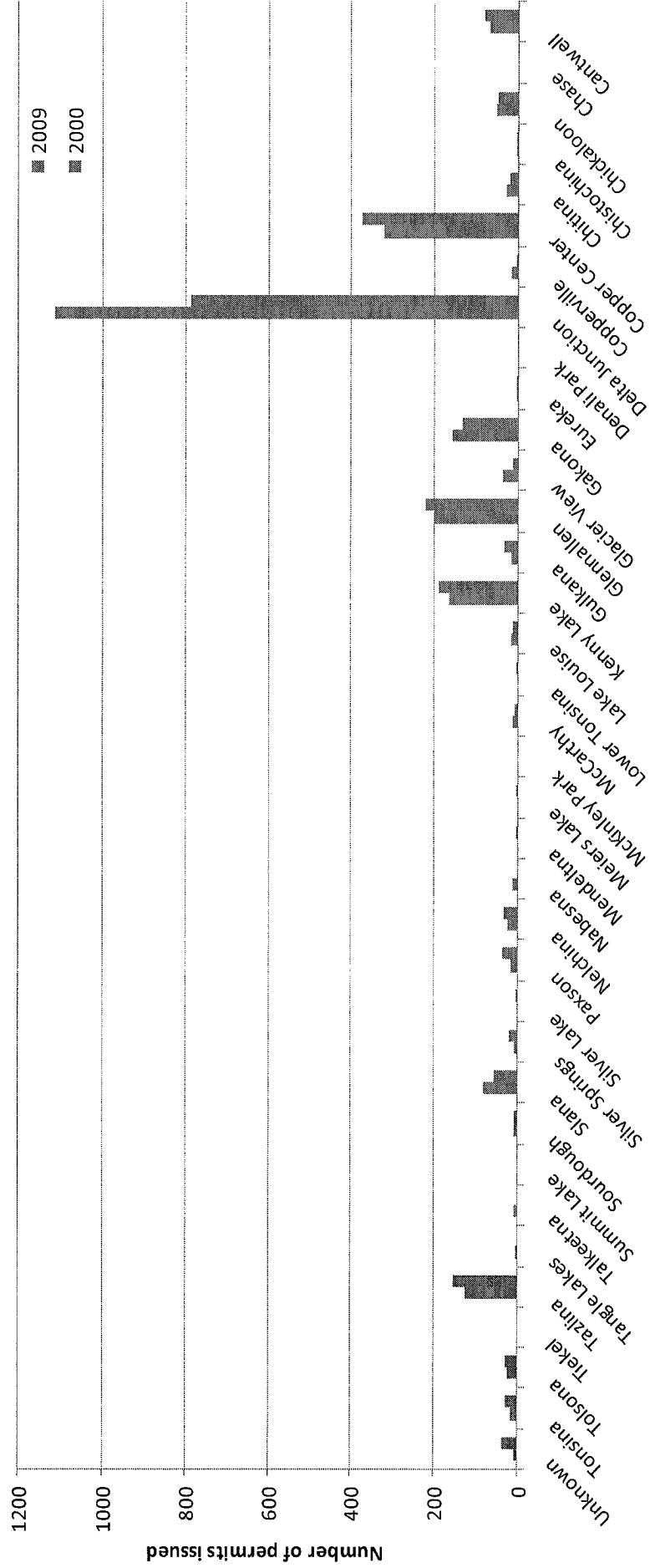
## GMU 13 Federal Nelchina caribou hunt



Nelchina

Year	Permits		Harvest Taken	Percent Success	Male		Female		Unknown	Days		Fall Pop'n est.imate
	Issued	Used			Male	Female	Hunted	est.imate				
2010	2,454	138	95	68.8	83	12				678	44,954	
2009	2,576	1,338	348	26	341	7				7,404	35,272	
2008	2,532	1,229	273	22.2	180	89	4			7,188	33,288	
2007	2,399	1,092	385	35.3	259	120	6			6,215	32,569	
2006	2,631	1,317	570	43.3	318	238	14			6,983	34,699	
2005	2,557	1,498	610	40.7	365	238	7			7,747	36,428	
2004	2,555	1,337	335	25.1	248	85	2			8,465	36,677	
2003	2,574	1,239	322	26	317	2	3			8,576	30,141	
2002	2,507	1,379	337	24.4	323	2	12			10,846	34,381	
2001	2,565	1,468	498	33.9	489	3	6			9,838	33,745	
2000	2,358	1,399	275	19.7	194	80	1			12,128	29,602	
1999	2,631	1,411	391	27.7	208	182	1			10,982	31,365	
1998	2,413	1,431	420	29.4	230	187	3			12,358	38,554	
1997	1,622	883	173	19.6	113	59	1			9,537	31,894	
1996	1,653	998	276	27.7	167	107	2			11,335	44,272	
1995	1,651	1,113	226	20.3	118	103	5			15,347	50,282	
1994	1,617	946	193	20.4	157	35	1			11,126	44,093	
Total	39,219	20,161	5,702		4,086	1,548	68			156,396		
Average (1994-2009)	2,303	1,255	352	28	252	96	5			9,755	36,079	

# GMU 13 Nelchina caribou federal subsistence hunter residency





Community	Year	Permits		Harvest	Percent	Success	Male	Female	Unknown	Days
		Issued	Used							
Unknown	2009	8	3	1	33.3	1				5
Tonsina	2009	18	5	1	20	1				23
Tolsona	2009	26	12	1	8.3	1				83
Tiekel	2009	2	0	0						
Tazlina	2009	124	87	12	13.8	12				609
Tangle Lakes	2009	4	4	2	50	2				14
Talkeetna	2009	10	8	2	25	2				60
Summit Lake	2009	2	1	1	100	1				2
Sourdough	2009	8	6	1	16.7	1				129
Slana	2009	80	21	4	19	4				140
Silver Springs	2009	8	6	0	0					82
Silver Lake	2009	2	2	0	0					6
Paxson	2009	16	9	6	66.7	6				25
Nelchina	2009	26	10	3	30	3				34
Nabesna	2009	12	0	0						
Mendeltna	2009	2	2	0	0					40
Meiers Lake	2009	2	2	2	100	2				30
McKinley Park	2009	2	2	0	0					4
McCarthy	2009	14	10	0	0					46
Lower Tonsina	2009	2	0	0						
Lake Louise	2009	16	10	0	0					39
Kenny Lake	2009	166	77	10	13	10				344
Gulkana	2009	18	8	1	12.5	1				81
Glennallen	2009	200	106	19	17.9	19				543
Glacier View	2009	38	31	10	32.3	10				150
Gakona	2009	158	96	17	17.7	17				616
Eureka	2009	4	2	2	100	2				2
Denali Park	2009	2	0	0						
Delta Junction	2009	1,110	526	186	35.4	180	6			2,049
Copperville	2009	18	16	2	12.5	2				58
Copper Center	2009	320	191	44	23	44				1,448
Chitina	2009	28	14	6	42.9	6				161
Chistochina	2009	6	4	3	75	3				12
Chickaloon	2009	54	38	7	25	7				192
Chase	2009	2	0	0						
Cantwell	2009	68	29	5	17.2	4	1			377

Community	Year	Permits Issued		Permits Used		Harvest Taken		Percent Success		Male		Female		Days Hunted	
		Permits Issued	Permits Used	Harvest Taken	Percent Success	Male	Female	Unknown	Days Hunted						
Tazlina	2009	124	87	12	14%	12			609						
Gulkana	2009	18	8	1	13%	1			81						
Gakona	2009	158	96	17	18%	17			616						
Copper Center	2009	320	191	44	23%	44			1,448						
Chitina	2009	28	14	6	43%	6			161						
Chistochina	2009	6	4	3	75%	3			12						
Cantwell	2009	68	29	5	17%	4	1		377						
Total		722	429	88		87	1		3304						
Average		103	61	13	29%	12	1		472						

Community	Year	Permits Issued		Permits Used		Harvest Taken		Percent Success		Male		Female		Days Hunted	
		Permits Issued	Permits Used	Harvest Taken	Percent Success	Male	Female	Unknown	Days Hunted						
Delta Junction	2009	1110	526	186	36%	180	6		2049						
non-Delta Jcn	2009	1466	812	162	20%	161	1		5355						
Total		2576	1338	348		341	7	0	7404						

Year	Harvest			Permits Issued			Harvest 2 permits		
	Fall	Winter	Total	Year	Permits Issued	Harvest Taken	Unique hunters	Harvest 2 permits	
2009	116	232	348	2010	2,576	348	244	104	
2008	248	25	273	2009	2,532	273	192	81	
2007	80	305	385	2007	2,399	385	270	115	
2006	115	455	570	2006	2,631	570	372	198	
2005	80	530	610	2005	2,557	610	409	201	
2004	111	224	335						
2003	216	106	322						
2002	275	62	337						
2001	170	328	498						
2000	185	90	275						

10/08/10

RC 40  
DATE

To the Alaska Board of Game

Testimony by Vera Paschke 2401 Redwood St. Anch 99508

Re: Proposal 34 and 36

- I • Oppose these proposals
- Urge an overall understanding of the reasons for decline in caribou. Learn from scientific evidence

- Do not allow/utilize snaring/trapping of bears, black or brown bears, sows and cubs

allowing non-residents to carry out the state's predator control program is irresponsible, will lack in oversight and consistency in how policies are implemented.

These proposals will lead to abuse and increased incidental catch of brown bears and other wild life.

Implications of these policies/proposals are: they will create great controversy and will have economic impact in other areas, such as visitors

to the state from not only, the lower 48 but also Europeans who come to AK, not just to hunt, but to climb, hike, ski, kayak and enjoy viewing and photographing wild life. They contribute hugely, through travel, purchasing, gear, food, chartering planes, etc.

It would be economically disastrous to discount these visitors. Please move beyond tunnel vision and these

Thank you  
Vera Paschke  
32 yr resident of AK

These barbaric predator control practices

10 Game Board FAX 907 465-6074  
From 907 348-0466

TO AK Game Board

RC 41

This letter is to express my extreme dissatisfaction ~~the~~ with the game board's intent to allow bear snaring. I cannot believe that in this day and age such an inhumane practice is being implemented and condoned. I am sure the vast majority of Alaskans will disapprove of this measure if they were informed. Hopefully the public outcry against this will cause you to put an end to this barbaric plan.

Sincerely

Dpw Ecklund

Joseph VerSteeg

1520 South River Drive

Eagle River, AK 99577

October 9, 2010

RC 42

Alaska Board of Game

Fax: 907 465-6094

To Whom It May Concern:

Do not allow bear trapping to become legal in the state of Alaska. There are much more humane options for controlling bear populations if it is deemed necessary.

Joe VerSteeg

J. VERSTEEG

Catherine VerSteeg, DVM  
1520 South River Drive  
Eagle River, AK 99577  
October 9, 2010

RC 43

Alaska Board of Game  
Fax: 907 465-6094

To Whom It May Concern:

I am writing to express my disagreement with the consideration of legalizing bear trapping (snaring) in Alaska. This is an inhumane method of predator control. If predator control is determined necessary through scientific evidence and research, then a more humane approach should be considered.

Please do not allow this outdated, barbaric act to be legalized. There are far more humane options that will meet the same end if that end is determined to be necessary.

Thank you for your consideration,  
Katy VerSteeg, DVM

Kathy VerSteeg DVM

RC44

**PROPOSAL 31A** 5 AAC 92.125.(c) **Intensive Management Plan for Unit 13.** Reauthorizes the Intensive Management Plan for Unit 13.

**5 AAC 92.125.(c) Unit 13 Wolf Predation Control Area:** the Unit 13 Predation Control area is established and consists of all lands within Units 13(A), 13(B), 13(C), and that portion of Unit 13(E) east of the Alaska Railroad, except **National Park Service and other** federal lands **where same-day-airborne take of wildlife is not allowed**, encompassing approximately 15,413 square miles; notwithstanding any other provision in this title, and based on the following information, the commissioner or the commissioner's designee may conduct a wolf population reduction or wolf population regulation program in the Unit 13 wolf Predation Control Area:

(1) the discussion of wildlife population and human use information is as follows:

(A) the prey population information is as follows:

(i) based on extrapolation of fall **2009** [2005] count area densities, moose population estimates by subunit of Unit 13 were: **3,530** [2,720] moose in Unit 13(A), **4,630** [3,970] moose in Unit 13(B), **1,610** [1,170] moose in Unit 13(C), and **4,940** [4,050] moose in Unit 13(E);

(ii) historical moose count area data indicate that habitat carrying capacity has not likely ever been reached by this population; this population peaked during the late 1980s in excess of 20,000 moose for all of Unit 13; during that time, fall data indicated calf-to-cow ratios unit-wide were at peak levels, suggesting the habitat carrying capacity had not been reached; the subsequent population decline was attributed to seven years of deep snow from 1988 – 1994; an observed twinning rate of 29 percent in 1992 within eastern Unit 13(E), shortly after the population peak, was indicative of a level of nutrition well above what would be expected had carrying capacity been reached;

(iii) the age structure of the population shifted towards older age classes between the mid-1990s and approximately 2003, during which time the calf-to-cow ratio [DECLINED DRAMATICALLY AND] remained low; the actual number of calves counted across standard count areas declined 62 percent between 1996 and 2000; **between 2000 and 2009, the number of calves counted across the same area increased 150% percent;** [RECRUITMENT HAS SLOWLY IMPROVED SINCE 2000;] the percentages of calves during the fall **2009** [2005] surveys in Units 13(A), 13(B), 13(C), and 13(E) were **11** [10] percent, **18** [15] percent, 13 percent, and **16** [12] percent respectively; the percentage of yearling bulls observed during moose counts has also **increased** [CONSISTENTLY RISEN] across the area, **and is up from 2 percent in 2000 to 6 percent in 2009; the age structure**

of the Unit 13 moose population is currently shifting back towards younger age classes;  
[SINCE 2001]

(iv) the bull-to-cow ratio within the Unit 13 moose population has steadily increased [RISEN] over the last 15 [11] years bull:cow ratios observed during fall 2009 surveys for Units 13(A), 13(B), 13(C), and 13(E) were 27:100, 29:100, 42:100, and 34:100 respectively; bull:cow ratios are currently being met in all four subunits; [FROM 16:100 IN 1994 26.8:100 IN 2005, LARGELY DUE TO CHANGES IN HARVEST REGULATIONS]; the estimated number of bulls is now within the management objective range in Units 13(A), 13(B), and 13(E); the estimated number of cows is now within the management objective range in Unit 13(A); [COWS IN THE AREA IS BELOW THE MANAGEMENT OBJECTIVE; THE COW DENSITY PER SQUARE MILE OBSERVED IN TREND COUNT AREAS DURING FALL 2005 SURVEYS IN UNITS 13(A), 13(B), 13(C), and 13(E) WERE 0.9, 0.8, 0.8, AND 0.6 RESPECTIVELY;]

(v) observations [DURING 2004] of radio collared cow moose in western Unit 13(A) during 2009 [2004] indicated 80 [82] percent parturition among cow moose three years of age and up;

(vi) historically, observed fall calf-to-cow ratios have been used to indicate initial recruitment within this population considering the majority of calf mortality occurs prior to fall moose counts; unitwide [THE] fall calf-to-cow ratios [WITHIN THIS AREA] have increased [STEADILY RISEN] from 11:100 in 2000 to 23:100 [18:100] in 2009 [2005]; [THE FALL 2005] calf-to-cow ratios observed during fall 2009 surveys in Units 13(A), 13(B), 13(C), and 13(E) were 16:100 [14:100], 29:100 [23:100], 22:100 [18:100], and 25:100 [16:100] respectively; estimated annual calf survival between 2001 and 2009 ranged 15 – 40 [2004 RANGED 15 – 31] percent;

(vii) harvestable surplus in this area is estimated at four to five percent of the total moose population based on information from other interior and south-central moose populations; the current harvest rate for Unit 13 is estimated at 4.6 – 5.2 [3.3 – 3.8] percent of the population;

(viii) the population objectives for Units 13(A), 13(B), 13(C), and 13(E) as established in 5AAC 92.108 are 3,500 – 4,200, 5,300 – 6,300, 2,600 – 3,500, and 5,000 – 6,000 moose respectively; these objectives are below the maximum moose numbers estimated [OBSERVED] in these areas between 1987 and 1989 and are likely attainable given the history of productivity and survival patterns in this area; the bull-to-cow objective



**is 25:100 for Unit 13; the calf-to-cow objectives are 25:100 for Unit 13(A) and 30:100 for Units 13(B), 13(C), and 13(E);**

(ix) the moose harvest objectives for Units 13(A), 13(B), 13(C), and 13(E) as established in 5AAC 92.108 are 210 – 420, 310 – 620, 155 – 350, and 300 – 600 moose respectively; **with the harvest of bulls and cows, the current harvest objectives are being met in Unit 13(A) and** are likely attainable **in Units 13(B) and 13(C)** given the history of harvest patterns in **these areas; the harvest objectives for Unit 13(E) may not be attainable and should be re-evaluated;** [THIS AREA]

(x) the estimated annual mortality of radio-collared cows in western Unit 13(A) ranged from **5** [7] – 11 percent between 2001 and **2009** [2004]; natural bull mortality across this area likely ranges from 8 – 20 percent depending on snow depths and predation; **for Units 13(A), 13(B), 13(C), and 13(E), the [AVERAGE] bull harvest from 2000 – 2004 averaged [WAS] 159, 149, 75, and 102 bulls [FOR SUBUNITS 13(A), 13(B), 13(C), AND 13(E)] respectively; from 2005 – 2009, the bull harvest averaged 223, 182, 66, and 147 for the same units;**

(xi) this moose population is considered to have moderate productivity in relation to surrounding interior and southcentral moose populations; the moose habitat in Unit 13 has not changed considerably over the past 40 years; this area is generally considered interior boreal forest, and being south of the Alaska Range, this area regularly receives more annual precipitation and thus less frequent fires than adjacent more productive interior Units 12 and 20; twinning rates have consistently been a key indicator of moose habitat quality; data from radio collared cow moose in western Unit 13(A) [BETWEEN 1994 AND 2004 INDICATE MODERATE TWINNING RATES] **indicate increasing productivity; twinning rates ranged 9 – 27 [BETWEEN NINE AND 27] percent from 1994 – 2004, and have since increased to a range of 14 – 35 percent from 2005 – 2009; twinning flights of uncollared cows were also flown across the Upper Susitna River portion of Units 13(B) and 13(E) in 2008 and 2009, observed twinning rates in these years were 48 and 50 percent respectively; during a twinning flight in northern Unit 13C in 2008, 61 percent twinning was observed;**

(xii) concurrent with the initial adoption of the wolf control implementation plan for this area **and peak wolf numbers in Unit 13** in 2000, increases in wolf hunting and trapping occurred; [THIS] increased effort was concentrated in areas of western Unit 13(A) with good winter access; this initial pressure reduced wolf numbers enough to bring about a

slight increase in moose numbers in this isolated area; moose in the remainder of Unit 13 continued to decline; **in 2005, Unit 13(C) was added to the control plan area;** the implementation of same-day-airborne wolf taking under **this plan** [THE WOLF PREDATION CONTROL PLAN FROM JANUARY 2004 TO APRIL 2006] has effectively halted the moose population decline across **the entire control plan area** [UNITS 13(A), 13(B), AND 13(E); THIS CHANGE IS EVIDENCED BY INCREASED NUMBERS OF ADULT MOOSE IN THE PORTION OF UNIT 13(A) ACCESSIBLE TO AIRCRAFT LANDINGS, AND BY SMALL INCREASES IN CALF AND YEARLING NUMBERS ACROSS UNITS 13(A), 13(B), AND 13(E)] **and has allowed the population to grow steadily;**

(B) the human use information for prey population is as follows:

(i) historically, subsistence moose harvest in Unit 13 has been largely managed under permit systems, either by registration, drawing, or Tier II permit; harvest in this area has been recorded since the mid-1960s; since 1980, the annual Unit 13 subsistence moose harvest averaged 149, 77, and **97** [99] for the [DECADAL] periods 1980 – 1989, 1990 – 1999, and 2000 – **2009** [2004];

(ii) the average annual number of hunters participating in Unit 13 subsistence moose hunts averaged 465, 391, and **680** [556] for the periods 1980 – 1989, 1990 – 1999, and 2000 – **2009** [2004]; these are subsistence permit or harvest ticket holders who reported hunting; many hunters who were unsuccessful in receiving a state subsistence permit likely took part in the **resident** general season; thus reported demand for subsistence is [LIKLEY] a minimum estimate;

(iii) since 1963, the average annual harvest from general moose hunts in Unit 13 has averaged 1,501, 919, 804, 797, and **521** [469] for the periods 1963 – 1969, 1970 – 1979, 1980 – 1989, 1990 – 1999, and 2000 – **2009** [2004]; [THE GENERAL HARVEST ACCOUNTED FOR 83 AND 100 PERCENT OF THE TOTAL HARVEST FOR THE SAME PERIODS]; the average annual number of hunters participating in general hunts averaged 3,805, 3,071, 3,325, 4,448, and **3,171** [2,977] for the periods 1963 – 1969, 1970 – 1979, 1980 – 1989, 1990 – 1999, and 2000 – **2009** [2004]; during three years in the mid-1990s, over 5,500 individuals hunted during the general moose hunt in Unit 13; to help reduce harvest pressure in Unit 13 between 1990 and 1992, seasons were shortened considerably; the annual general harvest dropped from 891 in 1989 to 382 in 1990 due to this change; in 1993, a small drawing hunt for cows was implemented in subunit 13(A), though

the unitwide bull bag limit changed to one bull with a spike or fork or 50-inch antlers or antlers with three or more brow tines on one side; the brow tine restriction was increased to four or more brow tines in 2001; **from [IN] 1995 – 2008**, a Tier II hunt was **implemented [ADDED] for any bull unitwide; 150 permits were available; from [SINCE] 2002 – 2008**, the nonresident season was closed unitwide; **in 2009 three new hunting opportunities were established for Unit 13: a community hunt permit was issued for moose, up to 100 any bull moose could be harvested, a total of 381 hunters subscribed; resident-only any bull hunts were implemented for remote portions of Unit 13, a total of 160 drawing permits were issued; and nonresident hunts for bulls with 50-inch antlers or antlers with four or more brow tines on one side were implemented, a total of 50 drawing permits were issued; for 2010 the resident-only hunt permits were increased to 325 and the nonresident hunt permits were increased to 110, although the community hunt was eliminated due to a court ruling;**

(C) the predator population information is as follows:

(i) it is the intent of this plan to maintain wolves as part of the natural ecosystem within the geographical area described for this plan; however, studies in Alaska and elsewhere have repeatedly concluded that large annual reductions in wolf populations are required to reduce predation by wolves on their prey; to achieve the desired reduction in wolf predation, but ensure that wolves persist within the plan area, population management takes into consideration, the potential for immigration and the availability of alternate prey in the area;

(ii) the fall **2009 [2005]** population estimate was **260 – 280 [270 – 290]** wolves, based on wolf and track sightings gathered from staff biologists, hunters, trappers, and pilots, adjusted for documented harvest; pack observations from wolf control permittees increase the documentation of pack ranges and enhances population estimates; **spring population estimates have averaged 159 from 2006 – 2010; spring wolf population objectives were met each year from 2006 – 2009; the spring 2010 estimate of 170 – 190 wolves was just slightly above the objective due to poor snow conditions during the winter;**

(iii) the **fall** wolf population in Unit 13 peaked at just over 500 wolves during 1999 and 2000; no carrying capacity has been established for wolves in Unit 13, but it is likely above 520 wolves **assuming high moose and caribou numbers;**

(iv) the estimated moose-to-wolf ratio for Unit 13 ranged from 38.1 – 43.0 in **the fall of 2004; it** [, AND] improved to 51.8 – 58.6 in the fall of 2005, **and to 61.2 – 69.5 in the fall of 2009;**

(v) alternate prey in this area include large prey items such as caribou and sheep, as well as relatively abundant beaver, and the cyclic populations of small game such as upland birds and hares; Nelchina herd caribou, which summer entirely in this area, are relatively abundant, and have ranged between 30,000 and **45,000** [37,000] animals since 2000; generally, 10 – 50 percent of the Nelchina caribou herd winters in central Unit 13; sheep are only available in western Unit 13(A), small portions of Unit 13(E), and Unit 13(D) which is outside the control area;

(vi) the number of moose killed by wolves in this area is dependent on snow depth and the abundance of alternate prey, particularly caribou; depending on snow depth, the availability of alternate prey, and average pack size, wolves in Unit 13 likely take between 1,000 and 4,000 moose per year;

(vii) the mortality of wolves in this area has historically been dominated by human harvest; since 2000, the annual harvest of wolves in Unit 13 has **ranged 78 – 269** [AVERAGED 203 (44 PERCENT OF THE ESTIMATED ANNUAL POPULATION)]; additional natural mortality within this population due to intra-specific strife or old age is likely five percent or less;

(viii) the spring (late winter) population objective for Unit 13 was set at 150 wolves throughout the 1980s based on prior evidence that when the wolf population had been maintained at this level, the moose population was able to grow, and provide a desired level of harvestable surplus; in the early 1990s, the department adopted a range of 135 to 165 wolves as the late winter objective; **by 2000 – 2001, a reduction of between 60 and 80 percent of the pre-control wolf population in some areas of Unit 13 was required** [IN ORDER TO ACHIEVE A REDUCTION OF BETWEEN 60 AND 80 PERCENT OF THE PRE-CONTROL ESTIMATE OF THE 500 WOLVES]; when applied to the wolf habitat within Unit 13, this equates to a density of **3.1 – 3.8** [3.3 – 4.1] wolves per 1,000 square kilometers;

(ix) the annual harvest objective for wolves is the difference between the **preliminary** fall population estimate and the desired **spring** population objectives; preliminary fall estimates are developed using the spring estimate and expected reproductive success; however, these preliminary fall estimates and the harvest objectives are continually

refined throughout the winter; the preliminary unitwide harvest objective for the 2010 – 2011 [2005 – 2006] season, calculated as the difference between the fall population estimate and the desired spring population objective, will be 140 – 160 [WAS SET AT 80 – 110] wolves;

(D) human use information for the predator population is as follows:

(i) from 2000 – 2003 wolves were abundant across Unit 13 and hunters and trappers were able to harvest an average of 220 wolves (45 percent of the estimated population) per year; the wolf population remained productive and high wolf numbers remained in inaccessible portions of the unit; land and shoot began January 2004 and 240 wolves were taken that year (50 percent of the estimated population); the wolf population subsequently declined to the desired level; aerial shooting has been used since 2006 to maintain desired population levels; from 2006 – 2009 an average of 99 wolves (36 percent of the estimated population) have been harvested annually; harvest of wolves with a firearm, excluding the same-day-airborne take, has been highly variable since the early 1970s and has ranged from 0 – 97 wolves, and 0 – 69 percent of the total take in Unit 13; harvest of wolves with the use of a snare or trap has similarly been highly variable and has ranged from 20 – 166 wolves, and 22 – 83 percent of the total take over the same period;

(ii) given the difficulty in finding wolves, harvest pressure diminishes as the wolf population declines; hunter harvest of wolves has always been highly opportunistic, and is difficult to predict; the trapper harvest of wolves is limited by the number of trappers willing to spend the time and effort to target this furbearer and by variable winter travel conditions; in addition to open creeks and regular overflow, many large rivers in the area have stayed open until late-winter, or even year-round, completely eliminating trapping pressure from remote areas of the unit;

(iii) [SOME] hunters and trappers [WILL] continue to pursue wolves in Unit 13 regardless of same-day-airborne wolf control efforts; considering the majority of wolves taken under wolf control permits are from remote interior portions of the unit, they are geographically separated from most wolf hunters or trappers; if wolf predation control programs are suspended [ARE NOT UNDERWAY], some of the program participants will [SIMPLY] shift their effort back to ground based harvest methods [, THOUGH THEIR EFFORTS WILL BE LESS EFFECTIVE];

(2) the predator and prey population levels and population objectives, and the basis for those objectives, are as follows:

(A) the moose population objectives for Units 13(A), 13(B), 13(C), and 13(E) as established in 5AAC 92.108 are 3,500 – 4,200, 5,300 – 6,300, 2,600 – 3,500, and 5,000 – 6,000 respectively; these objectives were based on historical information about moose numbers, habitat condition, sustainable harvest levels, and human use; the objective levels are below the maximum moose numbers **estimated** [OBSERVED] in these areas between 1987 and 1989; **population objectives are being met in Unit 13(A)** and are likely attainable **in Units 13(B), 13(C), and 13(E)** [GIVEN THE HISTORY OF PRODUCTIVITY AND SURVIVAL PATTERNS IN THIS AREA];

(B) the pre-control estimated wolf population in Unit 13 was over 500 wolves during **the** fall of 2000; studies in Alaska and elsewhere have repeatedly concluded that large, annual reductions of wolves are required to diminish wolf population levels and predation by wolves on their prey; consistent with scientific studies and department experience the objectives of this plan **were**[IS] to substantially reduce wolf numbers compared to the pre-control level in order to relieve predation pressure on moose and allow for improved recruitment to the moose population; **through maintenance of current wolf population levels, progress is being realized towards moose composition, population, and harvest objectives;** this plan also has as a goal to maintain wolves as part of the natural ecosystem [WITHIN THE DESCRIBED GEOGRAPHICAL AREA; TO ACHIEVE THE DESIRED REDUCTION IN WOLF PREDATION, BUT]; **to** ensure that wolves persist within the plan area, the wolf population in Unit 13 will be **maintained at** [REDUCED TO] no fewer than 135 wolves;

(C) the spring (late-winter) population objective for Unit 13 was set at 150 wolves throughout the 1980s based on prior evidence that when the wolf population had been maintained at this level, the moose population was able to grow, and provide a desired level of harvestable surplus; in the early 1990s, the department adopted a range of 135 –165 wolves as the **spring** [LATE-WINTER] objective;

(3) the justifications for the predator control implementation plan are as follows:

(A) Unit 13 long has been an important hunting area for subsistence by local area residents and much of the state's population in Anchorage, the Matanuska-Susitna valley, **as well as** [AND] Fairbanks **and other communities around the state;** it is recognized under the state's intensive management law as an area where moose and caribou are to be managed for high levels of human consumptive use;

(B) the management objectives set by the board for the moose population and human harvest are **now being met in Unit 13(A), but not in Units 13(B), 13(C), or 13(E)** [BEING

MET]; bans on the same-day-airborne take of wolves in 1987 and again in 1996 allowed the wolf population to increase; **during** [SINCE] the early 1990s the moose population [HAS] declined after several years of deep snow and from wolf predation from a record high wolf population; as the moose population declined, calf predation by brown bears accentuated the decline; in an effort to reinitiate predation control activity, the board established a wolf predation control area covering much of Unit 13 under this section in 2000; though the wolf predation control area had been established, no aerial based action was taken by the state until January 2004 when land and shoot wolf control by state permittees was initiated; the most recent moose trend counts have indicated that [WHILE] the decline has stopped **and** the population is **recovering** [ONLY BEGINNING TO RECOVER]; further control of wolf predation is necessary to increase the moose population to the objective levels **in Units 13(B), 13(C), and 13(E) as well as increase and maintain the available surplus necessary to meet harvest objective levels;**

(C) continuation of wolf predation control **is necessary to maintain currently observed harvest levels in Unit 13(A) and moose population growth in Units 13(B), 13(C), and 13(E); as moose population and harvest objectives are realized, control efforts will be managed accordingly;** [WILL REDUCE WOLF-CAUSED MORTALITY AND IMPROVE MOOSE SURVIVAL;] land and shoot wolf take has been implemented in Unit 13 in the past, and has effectively reduced moose mortality to allow the moose population to increase; the private pilots participating as permittees in this program to date have **similarly** proven [EXTREMELY] effective in reducing the wolf population when allowed to take wolves on the same day they are airborne;

(D) historical predator and prey management in Unit 13 has shown that when the late-winter (spring) wolf population was maintained at 135 – 165 wolves, annual moose survival was adequate to allow the population to increase;

(E) the unit-wide wolf take [IS SLIGHTLY BELOW THE HARVEST OBJECTIVE, IN PART BECAUSE TAKE] is split between same-day-airborne take, hunting, and trapping; the level of take **has been within** [IS NEAR] objective levels **since 2005** [IN THE CENTRAL PORTION OF THE WOLF CONTROL IMPLEMENTATION AREA; HUNTING AND TRAPPING HARVEST OUTSIDE THE IMPLEMENTATION AREA HAS BEEN LOWER AND MORE DIFFICULT GIVEN THE LACK OF ACCESS RELATED TO OPEN WATER AND THE DIFFICULTY IN TAKING WOLVES THAT HAVE LARGER HOME-RANGES DUE TO LOW PREY DENSITY]; the use of same-day-airborne techniques allows wolf densities to be **maintained at objective levels** [REDUCED] in the central portion of the wolf

control implementation area, the most important winter moose habitat in Unit 13; hunting and trapping harvest supplement predation control activities by harvesting wolves along the road system; these complementary programs will effectively **maintain** [REDUCE] the unit-wide wolf population **at** [TO] the objective level;

(F) by reducing year-round mortality on all demographic groups of the moose population simultaneously, the **maintenance of acceptable** [REDUCTION OF] wolf predation will help ensure a consistent age structure in the moose population as it increases;

(G) multiple measures have already been taken to improve survival of moose in this area, including the liberalization of seasons and bag limits for wolves, brown bears, and black bears over the past **15** [10] years; the current wolf hunting and trapping seasons are effectively maximized and any further extensions into the summer season would likely fail to increase the take by any significant amount; the current hunting seasons for brown and black bears are year-round with no resident tag requirement;

(H) presently known alternatives to predator control for reducing the number of predators are ineffective, impractical, or uneconomical; hunting and trapping conducted under authority of ordinary hunting and trapping seasons and bag limits are not effective reduction techniques in sparsely populated areas such as Unit 13; the inherent wariness of wolves, difficult access, increased costs of trapping, and relatively poor pelt prices explain why wolf harvest rates in this unit rarely exceed 50 percent **of the population estimate, and generally average only 35 – 40%**; the wolf harvest rates in Unit 13 are considered moderate, and reflect dedicated hunter and trapper effort throughout the accessible portions of the unit; however, the harvest by hunters and trappers **while** [HAS BEEN] ineffective in reducing the wolf population, **has proven an important tool for maintaining desired population levels for short periods of time**; application of the most common sterilization techniques (surgery, implants, or inoculation) are not effective reduction techniques because they require immobilization of individual predators, which is extremely expensive in remote areas; relocation of wolves is impractical because it is expensive and it is very difficult to find publicly acceptable places for relocated wolves; habitat manipulation is ineffective because it may improve the birth rate of moose in certain circumstances, but it is poor survival, not poor birth rate that keeps moose populations low in rural areas of mainland **and some portions of Southcentral** Alaska; supplemental feeding of wolves and bears as an alternative to predator control has improved moose calf survival in two experiments; however, large numbers of moose carcasses are not available for this kind of effort and transporting them to remote areas of Alaska is not practical; stocking of moose is impractical



because of capturing and moving expenses; any of the alternatives to a wolf predation control program are not likely to be effective in achieving the desired level of predator harvest;

(4) the permissible methods and means used to take wolves are as follows:

(A) hunting and trapping of wolves by the public in Unit 13 during the term of the program may occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles as provided in 5 AAC 92.080;

(B) the commissioner may issue public aerial shooting permits or public land and shoot permits as a method of wolf removal under AS 16.05.783;

(5) the anticipated time frame and schedule for update and reevaluation are as follows:

(A) for up to six [FIVE] years beginning on November 1, 2010 [JULY 1, 2005], the commissioner may reduce the wolf population within the Unit 13 Predation Control Area;

(B) annually, at the regularly scheduled spring board meeting, the department shall to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan;

(6) other specifications the board considers necessary are as follows:

(A) the commissioner will suspend wolf control activities

(i) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers below the management objective of 135 wolves specified in this subsection;

(ii) when spring conditions deteriorate to make wolf control operations infeasible;

(iii) no later than April 30 in any regulatory year;

**(ix) when prey population and harvest objectives are reliably attained;**

(B) wolf control activities will be terminated

[I] WHEN PREY POPULATION MANAGEMENT OBJECTIVES ARE ATTAINED; OR

[II] upon expiration of the period during which the commissioner is authorized to reduce predator numbers in the predator control plan area;

(C) the commissioner will annually close wolf hunting and trapping seasons as appropriate to ensure that the minimum wolf population objective is met.

AC 45

# Nelchina Caribou

## Alternative Harvest Management Concepts



Corey Rossi – Director DWC

Alaska Department of Fish and Game

### **This Workgroup Process**

- This is largely an allocation issue
- ADFG participation is to provide the BOG:
  - 1) Biological Recommendations
  - 2) Administrative Considerations

## **Purpose of the Meeting**

- To facilitate public discussion of various harvest management concepts
- Provide the BOG a better understanding of public views through an interactive process

## **Structure of the Meeting**

- ADFG will present various concepts brought forward by the public
- Verbal comments will be heard in turn
- The BOG chairman is in charge of the meeting
- ADFG will help facilitate

## State Statute and Regulation establishing hunt status

- Super-abundance
- Tier I +
- Tier I *only*
- Tier II

## Hunt Alternatives and Concepts

- Random Draw
- Community Harvest
- Tier I
- Tier II
- Combinations of the above
- Weighted Draw
- Registration Hunt(s)

**Random Draw**

**Community Harvest**

## Community Harvest

### Basic Premise of this type of hunt

- Cultural tradition of providing for the community
- Allows for individual hunters to take game for others
- Sharing aspects, traditional harvest patterns

## Community Harvest

### Legal Issues and Considerations

- Residency-based participation
- Improper delegation of authority
- Inadequately noticed and documented



Tier I



Tier II

## **Weighted Draw**

## **Weighted Draw**

- **Applicants with high scores get more permits than applicants with low scores**
- **All applicants have a chance to get a permit**



## **Weighted Draw**

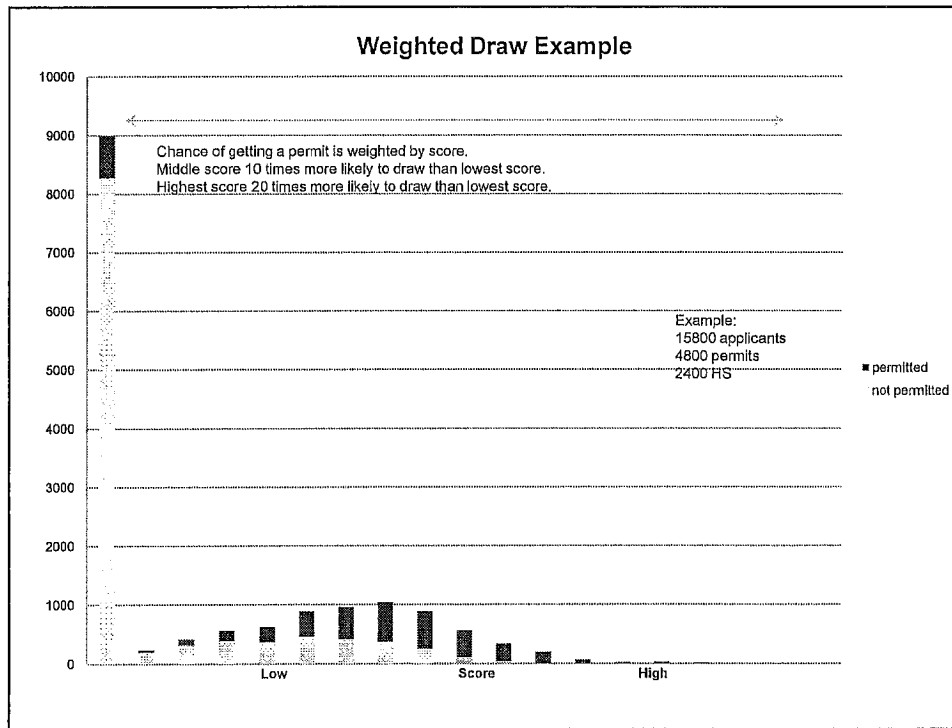
### **Pros and Cons**

- **Provides every Alaskan a chance to apply every year**
- **Works in spite of herd fluctuation**
- **Similar to long term program**
- **Opportunity for new people to enter the system**

## **Weighted Draw**

### **Pros and Cons**

- **Requires that ANS be adjusted up to include all harvestable surplus**
- **Relies on Tier II criteria; limits opportunity to historic use, ability to obtain food and “luck of the draw”**
- **Does not provide reasonable opportunity for subsistence**



# Tier I Registration

## Tier I Registration

- **Registration hunt open to all Alaska residents**
- **Includes hunt provisions to prevent over-harvest, provides reasonable opportunity for subsistence, and mitigates user conflict**
- **Hunt = Area + Time Period**

## Tier I Registration

### Pros and Cons

- **Can provide reasonable opportunity**
- **Provides additional opportunity for all other users when surplus exceeds ANS**

## **Tier I Registration**

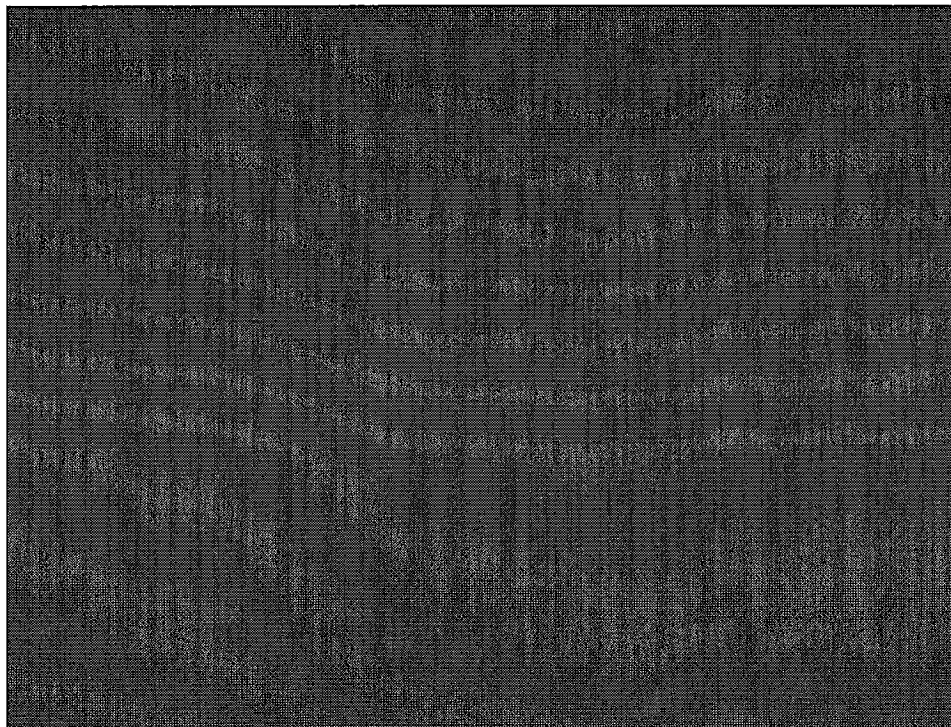
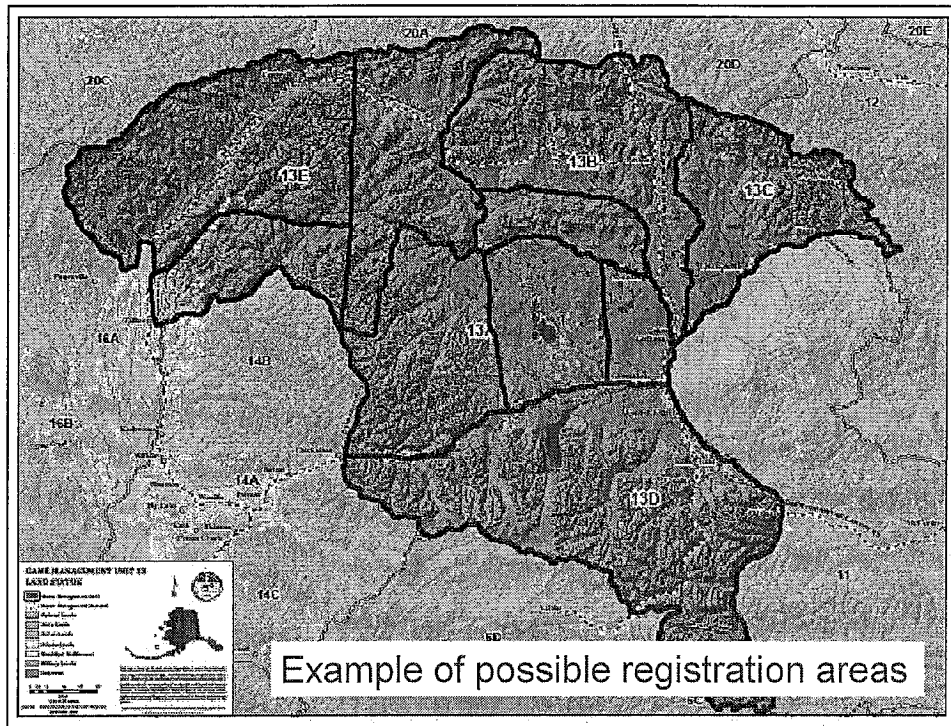
### **Pros and Cons**

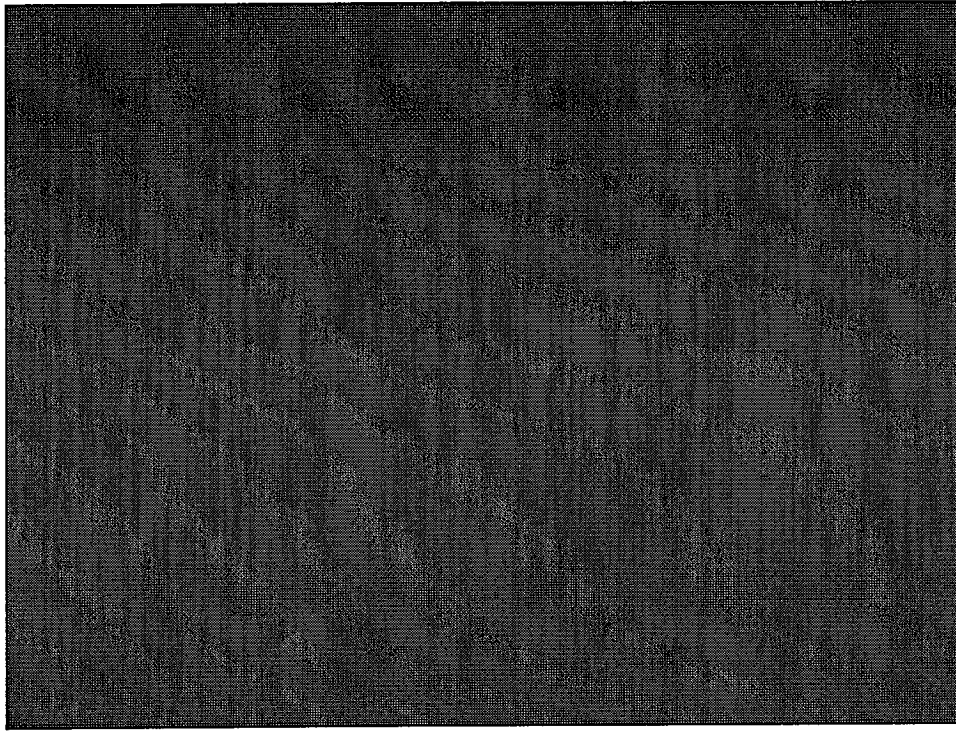
- **Without proper monitoring, it runs the risk of exceeding the harvestable surplus due to high numbers of hunters**
- **ADFG currently lacks the administrative capacity to conduct such a hunt**

## **Tier I Registration**

**Techniques for managing expected high numbers of hunters and the potential for over-harvest**

- **Registration for residents only**
- **Timing of registration**
- **Area / Zone management**
- **Harvest quotas by zone**
- **Timing of hunt periods**
- **Restrict other caribou hunting opportunity**
- **Limit by number of permits and/or sex of animal**





RC46

Comment of Abhinav Jene  
Aene ✓ by Stey Starkey

How to Fix the Courts concerns  
for the CHP:

In addition to adding the  
language of RC 32 regarding

amending SMAC 92.072

- Use the language on page  
one and two the first two

bullets - the explicit language for  
clearly that it is not residency based

and so Admin 1550 - In addition  
every time the regulation says cannot  
resident add "or member of a  
group" + and add groups to community.