ALASKA
PROFESSIONAL HUNTERS ASSOCIATION, INC.

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January 22, 2012

Cora Campbell, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

RECEIVED
FEB 03 2012
BOARDS

Dear Commissioner Campbell:

I first want to thank you for your leadership and vision in moving the Department forward, especially at this particularly challenging time. Thank you also for your help and support on the many issues we are dealing with relating to responsible wildlife management.

I know you are currently dealing with a host of other important issues at this time, but I would like to bring two issues to your attention that have a very serious impact on the licensed hunting guides in Southeast. I ask for your help in finding solutions to these issues.

As you are aware, the brown bear harvest in GMU4 has become a concern of your wildlife conservation staff. Although there is no data that indicates we have a biological problem with GMU4 brown bears, for the past 4 regulatory years the total human caused brown bear mortality has equaled or exceeded the guideline levels given in the Unit 4 Brown Bear Management Strategy (BBMS). The harvest of female bears is a significant aspect of how the guidelines for harvest are calculated. This concern prompted an early closure of last fall's GMU4 brown bear season which was unfortunate for resident and nonresident hunters as well as the guide industry. Last Friday the guides in Southeast also received a letter from your Sitka staff informing them of potential closure of the spring brown bear season by Emergency Order if mortality guidelines are exceeded.

Since November, we have been working within the industry to develop a proposal to the Board of Game to address exceedences of the total human caused mortality guideline for brown bears in GMU4. The Unit 4 BBMS remains a very pertinent and useful management plan and we are proposing no changes to it without Department, BOG, public and industry communication and cooperation. We believe, however, that there have been some changes in how the plan was supposed to work and this is having a negative impact on all brown bear hunters continued ability to hunt brown bear hunts in Southeast.

An example of this relates to how brown bear wounding loss is now being accounted for. For approximately the past five years, any brown bear wounded but not recovered by either a sport hunter or by an officer in a DLP situation is counted as a female bear in the total human caused mortality equation. This was not the case when the Unit 4 BBMS was created. Wounding loss was well recognized at the time the management plan was written but was recognized as an

indeterminate factor and one which probably has no measureable effect on bear populations. Quoting from the plan, "*ADF&G has no credible information on the magnitude of wounding loss and so does not typically include it as a factor in management equations or population modeling.*" This new practice of counting every wounded bear and unrecovered DLP bear as a dead bear as well as a female bear is a deviation from the plan and one which unfairly raises the total human caused mortality figure. In many cases, when a hunter wounds and does not retrieve a bear, or a bear is shot and escapes in a DLP situation it survives, and was not a female bear.

Another factor which has caused an increase in mortality is a significant increase in second-degree-of-kindred guiding for brown bears in GMU4, several times more than what was written into the Unit 4 BBMS. This also needs to be addressed and will result in reduced mortality.

Changes in hunting on private lands and recent increases in DLP mortality because of poor garbage handling in the various communities have also impacted the mortality figures. It is important to note that the harvest of brown bears as defined within the BBMS is capped at four percent of the population level. This is the most conservative harvest guideline of anywhere within the state. As well, science and inventory work since the BBMS was developed has indicated much higher population densities within certain areas. This science has not been addressed within the harvest guidelines.

These and several other issues have been subjects of our discussions since November and we believe that a workable solution exists to these issues. Emergency Order season closures do not need to be a routine part of the solution, especially considering we do not think there is a biological problem. These closures are expensive and extremely disruptive to all hunters as well as the guides' abilities to market their hunts.

Another aspect of last fall's closure is that in several SE regions where moose is an important food source, since the BBMS was developed, the moose populations have been affected by predation factors much of which have been related to brown bear caused mortality. When the EO was issued last fall during the resident moose hunting season, it affected areas where brown bear harvest needs to occur and they could not be harvested. This caused some invalid concerns from resident hunters that ADF&G was managing the brown bear harvest to not require an EO for the guide industry during the spring season.

Based on all of these factors and more that this letter will not allow detail on, I would ask that Emergency Order season closures for brown bear in GMU4 not be implemented unless there is a proven biological concern and that we are allowed time to develop a workable proposal for the next Southeast Board of Game meeting that addresses the mortality concern.

The second issue that I'd like to bring to your attention involves the new black bear management strategy in Southeast. At the last Southeast Board of Game cycle held in November of 2010, a new system was implemented for black bear hunting opportunity in Southeast that will require unguided non-resident hunters to draw a permit prior to hunting black bears. Guided non-resident hunters would not be required to draw a tag but guiding allotments would be averaged on use levels based on calendar years 2007 – 2009. Setting of these appropriate use levels required cooperative effort between the Forest Service and the Department which was approved and requested by the Board of Game.

A different management method, one not requiring this level of cooperation between agencies, was developed within the Department based upon bear harvest data for the individual guiding operations. This alternate management method unfortunately creates serious operational difficulties, particularly for the smaller guiding operations. It also creates perpetual uncertainties for all guides in trying to figure out how many clients can be taken each year. I would ask that your staff, with guidance from the Board of Game as needed, work with the Forest Service to develop a management strategy as originally intended.

Thank you very much for your consideration. We are willing to work with your staff in any way that would be helpful.

Most Respectful Regards,

Robert Fithian
Executive Director

cc: Craig Fleener, Dale Rabe, Doug Larsen, Christy Tibbles, Cliff Judkins, Ted Spraker, Nathan Turner, Mike Nizich

United States Department of the Interior
NATIONAL PARK SERVICE
Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
N12 (AKRO-ARDR&S)

February 17, 2012

Mr. Cliff Judkins, Chairman
Alaska Board of Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The National Park Service (NPS) appreciates the opportunity to comment on the proposals being considered by the Alaska Board of Game (BOG) at the Interior Region meeting on March 2-11, 2012 in Fairbanks. There are a number of proposals before the BOG that affect or have the potential to affect NPS areas. We appreciate your consideration of our comments.

As you have heard from the NPS in the past, our mission and mandates differ from the State of Alaska and other Federal agencies, and may require different management approaches consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's fundamental role in wildlife management while at the same time we must ensure that the laws and regulations of the National Park Service are upheld.

Our specific comments on proposals follow:

Sale of Big Game, Big Game Trophies: Proposals #44, 46–47
(Deferred from January 2010 Statewide meeting) (do not adopt)
Proposals 46-48 request changes to 5 AAC 92.200, the purchase and sale of game. The development of a cash economy associated with the sale of big game has often been shown to be detrimental to the species involved. Brown bear populations are usually small in number, have low population growth rates, higher commercial value, and are easily over-harvested. The commercial sale of big game animals provides economic incentives that may lead to wanton waste and illegal trafficking outside of Alaska. Should the Board adopt regulations that allow the sale of big game, NPS lands need to be excluded in order to prevent conflict with NPS regulations. NPS regulations prohibit the sale or commercial use of natural products taken from NPS areas. (Title 36 Code of Federal Regulations, 2.1(c) (3) (v)

Sealing and Bag Limits: Proposal # 109 (Deferred from January 2010 Statewide meeting) (do not adopt)
Proposal 109 would eliminate the statewide bag limit for black bear. The proposed regulatory change has the potential to create a conservation concern, especially in many areas where black bear populations have not been surveyed or studied. Consistent with past letters to the Board, NPS lands need to be excluded from any regulations where the intent is to reduce one population for the benefit of other species.

Black and Brown Bear Baiting: Proposals #119 (Deferred from January 2010 Statewide meeting), 196, 232, 236 (do not adopt)
The NPS is concerned about the expansion of bear baiting and has a long history of efforts to prevent habituation of bears to food rewards both to protect bears and for visitor safety. The NPS also has concerns about bait stations attracting non-targeted species, site restoration and bait site cleanup when the hunt is completed. These proposals would expand bear baiting and allow the take of brown or grizzly bears over bait. Interior grizzly bears are known to have low reproductive rates. Data does not exist to support the assertion that a conservation concern could be avoided. These actions are proposed as part of an intensive management program, not appropriate on NPS lands. Should the Board adopt regulations allowing the expansion of black bear baiting and the taking of brown or grizzly bears over bait, NPS lands need to be excluded.

Black Bear Trapping: Proposals #141-142 (do not adopt)
The NPS in past letters to the Board has consistently stated that black bears should not be classified as furbearers and NPS lands need to be excluded from any regulations allowing black bears to be snared or trapped. For many years, general wildlife conservation practices prohibited this method of taking black bears. This method can result in the taking of other non-targeted wildlife species. In addition to conservation concerns, bear trapping in National Park areas may lead to visitor safety issues. Also, where the intent of regulations is to reduce black bear populations for the benefit of other species, these regulations are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA. Should the Board adopt any proposal that expands the trapping of black bear, NPS lands need to remain excluded from this practice.

Implement Predator Control Programs: Proposals #157-159 (Mulchatna Caribou Herd), 163 (Unit 24B), 197 (Unit 20E), 238 (Unit 9B) (do not adopt)
Should the Board adopt any of these proposals, NPS lands need to be excluded from these regulatory changes. NPS policies prohibit unauthorized predator control programs on Preserve lands. Implementation of predator control programs adjacent to NPS lands should be carefully coordinated with the NPS so members of the public and others participating in the program are not put at risk of violating regulations.

Intensive Management Programs: Proposals # 146, 227-231, 260
(do not adopt)
As previously stated, intensive management practices including predator control activities, are not allowed on NPS lands. Native predator populations may not be manipulated, controlled or eradicated for the purpose of increasing harvestable species on

NPS lands. Should the Board authorize intensive management programs or predator control programs in Game Management Units containing NPS lands, these lands need to be excluded from these intensive management or predator control plans and regulatory actions.

Extend Seasons and Increase Bag Limits to Control Wildlife Populations: Proposals # 167, 181, 199, 235, 237 (do not adopt)
These proposals would extend seasons and bags limits for wolves, brown bear and black bear in attempts to control wildlife populations or increase prey species abundance. These proposed changes are not appropriate on NPS lands. Native predator populations may not be manipulated, controlled or eradicated for the purpose of increasing harvestable species on NPS lands. Should the Board adopt these or similar proposals, NPS lands need to be specifically excluded from these activities in order to prevent conflict with NPS statutes, regulations and policies.

Same Day Airborne Hunting of Black Bears over Bait: Proposal #143, 144
(do not adopt)
This proposed regulatory change would affect same day airborne hunter activities. NPS regulations prohibit same day airborne hunting in NPS areas. Should the Board adopt any proposals that allow same day airborne hunting, NPS lands must be excluded from these activities to avoid conflict with NPS regulations.

Use of Helicopters for Trapping in Region III: Proposal #147
(do not adopt)
The use of helicopters is generally prohibited on NPS lands except in emergencies involving public safety or serious property loss (36CFR 2.17(a)(3). Should the Board adopt this proposal, NPS lands need to be excluded from these activities.

Extend Seasons for Sheep and other Big Game: Proposals #133,136, 152
(do not adopt)
These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied to all of Region III as in proposal 133. Changing seasons could interfere with long established state and Federal subsistence priorities. Proposal 136 adds 7 days to the resident Dall sheep season. The proposed regulation change opens the resident season 7 days before the nonresident season. Proposal 152 establishes an early youth hunt (ages 10-17) for all big game species in Region III. Due to declining sheep population trends, not all areas can support extended seasons. There appear to be conservation concerns for some of Alaska's Dall sheep populations. Yet the proposed regulatory changes would extend the open season in areas that traditionally experience high hunting pressure. Further, extending hunts into the warmer summer season may result in increased meat spoilage and salvage problems. Should the Board adopt these proposals, NPS lands need to be excluded from these changes in regulation.

Furbearer Trapping – Extend Seasons: Proposal #180, 198, 199
(do not adopt)

Proposal 180 would add 31 days to the wolf trapping season in Units 25A, 25B and 25C. The proposed regulatory change establishes an earlier open season, October 1- April 30 and aligns wolf trapping seasons in Unit 25. Proposal 198 would align the fox trapping season in Units 12 and 20E, including the snare and trap restrictions in October and April, with the coyote season. The proposed October 15 – April 30 opening extends the season by 62 days. Proposal 199 would extend the closing date for both lynx and fox, in Units 12 and 20E, to April 30, to allow for additional harvest opportunity. We oppose extending the trapping season into months when animal are denning and raising their young and when pelts are in less than prime condition. Allowing furbearers to be trapped when their pelts are not prime is likely to result in lost economic opportunity for trappers who require prime pelts for sale. Should the Board support this proposal, NPS lands need to be specifically excluded.

Salvage of Game: Proposals #172, 234
(adopt)
Proposals 172 and 234 would require moose taken in Units 25B and 25C to have special meat salvage requirements. We support these changes to reduce the likelihood of spoilage and prevent wanton waste of moose meat transported from the field. The proposed changes are consistent with recently adopted Federal Subsistence Board regulations.

Establish a controlled use area north of Denali National Park, Proposal #233
(adopt)
Proposal #233 would establish a controlled use area on a small area of state land commonly referred to as the "wolf townships". This is an area of high use by a variety of user groups. The NPS supports this proposal. It would develop a controlled use area and a process to bring various user groups together in developing a plan to address the numerous issues raised in the proposal.

Close the nonresident season for caribou in parts of Unit 19, Proposal #156
(adopt in part)
The NPS is concerned about reported low harvest rates and apparent low population of caribou in the Tonzona herd near the western boundary of Denali National Preserve. We support the recommendation that a survey be conducted that will help to determine the health of this herd and any management actions needed.

Modify Moose Hunting Regulations along the Nabesna Road: Proposals #186 and #187 (adopt)
These proposals address the moose hunting regulations for the portions of Units 11 and 12 that are accessible from the Nabesna Road. Based on a recent NPS-ADF&G moose population survey of the affected area, the NPS supports ADF&G's modification of Proposal 186. This modified proposal would establish a single joint state-federal registration permit for the area and would align seasons and harvest limits along the length of the road for each user group. The resident season would be August 20 to September 17 and the nonresident season, August 24 to September 17. The bag limit for residents would be one bull with spike-fork or 50-inch antlers or antlers with at least 3 brow tines on one side and for nonresidents, one bull with 50-inch antlers or antlers with

at least 4 brow tines on one side. Establishing a joint state-federal registration permit for the area should result in improved harvest information that can be used for management. It is also consistent with recent action on a parallel proposal approved by the Federal Subsistence Board at its January 2012 meeting. We recommend taking no action on Proposal 187, based on our recommendation to adopt the modification of Proposal 186.

Increase Bag limits and Seasons for Brown Bear in Unit 9C: Proposal #261
(do not adopt)
The NPS has four concerns with this proposal. 1) It expands a hunting season and bag limit that was limited to the Naknek River drainage to all of Unit 9C including Katmai National Preserve and the Alagnek Wild River. 2) It allows one brown bear per year rather than one bear every four years for residents and nonresidents. 3) We have concerns over increased harvest potential in the preserve. 4) It changes the bear hunting season so there is increased overlap with sport fishing and bear viewing activities that may result in increase conflicts with these user groups.
The intent of the proposal is to "correct the predator situation in Unit 9C". Where the intent of regulations is to reduce bear populations for the benefit of other species, these regulations are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA. Should the Board adopt this proposal, NPS lands need to be excluded from this regulatory change.

We appreciate the opportunity to provide comments on these important regulatory matters. Should you or your staff have any questions please contact Debora Cooper at (907) 644-3505.

Sincerely,

Debora Cooper
Associate Regional Director
for Natural, Cultural and Subsistence Resources
National Park Service

cc:
Cora Campbell, Commissioner, ADF&G
Kristy Tibbles, Executive Director, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, FWS Liaison to the BOG
Joel Hard, Superintendent, Lake Clark NP&P
Ralph Moore, Superintendent, Katmai NP&P
Paul Anderson, Superintendent, Denali NP&P
Rick Obernesser, Superintendent, Wrangell-St. Elias NP&P
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NPres/Gates of the Arctic NP&P
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region

Alaska Board of Game
C/O Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Re: Bear Snaring

Dear Chairman Judkins and Members of the Board of Game.

I am a resident and hunter in Alaska and I am writing to you today with concern about your decision to enlist methods of predator control that are inhuman and unproven. I am hopeful that the board will reconsider permitting such inhumane and unscientific wildlife control methods as bear snaring, using airplanes to shoot predators, and using poisons. It is my understanding that the members of the Board of Game are appointed to represent the public, to use good judgment, knowledge, to conserve and develop Alaska's wildlife resources (Alaska Statute 16.05.221).

My outdoor experiences, including hunting and fishing are special because Alaska provides experiences of near wildness that cannot be found in many places. What makes Alaska special is the combination of land, species and the people that live here. It is your charge to manage the Game for the state of Alaska for the people of Alaska. By implementing unfounded and inhumane method, such as bear snaring in hopes of improving moose populations, you degrade the Alaskan standard. I expect more; specifically I would hope that the Board would consider all of the factors that go into moose populations and not succumb to the knee jerk scape-goat of blaming predators. Especially since we don't understand how predatory takes of moose compare to natural deaths, winter kills, vehicle strikes, hunting, disease, etc. Predators are part of the system that maintain the wildness of Alaska and make this such a great place to recreate outdoors. Do your job to represent the public, including all economic interests (sight-seeing, bear hunting, quality of life), and use good judgment by not allowing snaring, poisoning, or aerial shooting of bears or wolves.

Thank you for considering my comments. I will be watching and talking about this issue with my fellow Alaskans.

Sincerely,
Eric

Eric Rothwell

2727195

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BOARDS

February 28, 2012

To Alaska Board of Game,

We are adamantly opposed to bear snaring anywhere, at any time, for any "reason" that anti-predator zealots, which Board members have proved themselves to be, can conjure up.

The practice is cruel, indiscriminate, and unnecessary, and shows the Board's total disdain for wildlife other than meat on the hoof. Alaska is not a moose ranch, and the on going and escalating attempts to "control" Alaska's natural predators is becoming more and more shameful. If and when the moose population appears to be struggling, back off on human hunting. We have other choices. You need to look no further than to how our fisheries are managed to understand that, yes indeed, limiting the human take is an often used and effective management tool. Really, we can limit our take. You may get some loud squawkers, but most hunters get it. No, really, they do...

Alaskans and non-Alaskans alike spend a lot of time and money in the hopes of seeing bears and wolves in their natural habitat in this fabulous State. You all should be ashamed that you are even proposing a bear-snaring measure. It is truly reprehensible.

Marty and Annette Cordano
4440 Woronzof Drive
Anchorage, Alaska 99517

Proposals 133-135, 140, 152 RC 39

Proposal #133

Open resident seasons one week earlier than nonresident seasons

- Region 3
- Big game prey species
- Intensive Management (IM) Areas

Department Recommendation:

No Recommendation (Allocation)

1

Proposal #133

Open resident season one week earlier than nonresident season

---

– Similar to proposal #71

Failed

2

Proposal #133

- Probably caribou & moose
  - No IM: bison, muskox, sheep
  - not "prey": black bear, brown bear, wolf, wolverine

3

Proposal #133

- The board previously determined such issues case-by-case, based on
  - Species
  - Harvestable Surplus
  - C&T findings
  - Harvest: resident & nonresident

4

Proposal 133: Early resident <u>big game seasons in IM Areas</u>

- IM areas adopted for caribou & moose (5 AAC 92.108)
  - must provide for preference by residents for personal use of moose & caribou over taking by nonresidents.

5

Proposal 133: Early resident <u>big game seasons in IM Areas</u>

Caribou — 5 IM herds in Region 3

- 1 – no nonresident season (Macomb)
- 2 – more restrictive nonresident bag limits & seasons (40-mile, Porcupine)
- 2 – No nonresident restrictions (Delta, Central Arctic)

6

Proposal 133: Early resident big game seasons in IM Areas

No nonresident restrictions

- Delta:
  - –Negative C&T finding
  - –drawing permit
  - –Residents took 90% of harvest
- Central Arctic
  - –General Season
  - –Ample resident opportunity for
    - •C&T uses
    - •Subsistence needs

7

Proposal 133

Moose — Positive finding

50 hunts in 17 Units

CASE-BY-CASE:

- •16 drawing hunts
- •10 registration hunts
- •22 general season hunts
- •2 tier II hunts

8

Proposal 133

Moose — CASE-BY-CASE: 50 HUNTS

- **Nonresident Hunter Restrictions**
  - **21 hunts: no nonresident season**
  - **22 hunts: restricted antlers and/or season length**
  - **7 hunts: no nonresident restriction**
    - **4 general season**
    - **3 drawing hunts**

9

Proposal 133

CASE-BY-CASE:

3 predation control areas

–Restricted/eliminated nonresident seasons for moose or caribou populations that control programs intend to benefit.

10

Proposal #133

Open resident season a week earlier than nonresident season

- **Big game prey species**
- **Intensive Management (IM) Areas**

Department Recommendation:

No Recommendation (Allocation)

11

Proposal #134

Allocate Region 3 draw hunts
–90% of permits to residents

Department Recommendation:
No Recommendation (Allocation)

1

Proposal #134

- **The board previously determined such issues case-by-case, based on**
  - **Species**
  - **Harvestable Surplus**
  - **C&T findings**
  - **10-year Harvest by residents & nonresidents**

Proposal #134 2

Proposal #134

- Affected species:
  - brown bear
  - bison
  - caribou
  - moose
  - sheep

3

Proposal 134

Brown Bear —

- 1 drawing permit hunt
  - 6 permits to nonresidents
  - Residents hunt general season or registration

4

Proposal 134

Caribou —

- ▶1 drawing permit hunt
  (Unit 20A Delta herd)
  - No allocation
  - Resident hunters
    - 91% of permits

5

Proposal 134

Bison —

- ▶4 drawing permit hunts
  - No allocation
  - Residents hunters
    - 98% of permits

6

Proposal 134

Sheep —

- ▶3 drawing permit hunts
  - •2 – No allocation (Delta CUA, Mt Harper)
    - •Residents hunters draw 91%
  - •1 – allocated (Tok Management Area)
    - •Residents allocated 90%

7

Proposal 134

Moose —

- ▶115 drawing hunts in Region 3
  - •3,312 total permits
  - •96 permits to nonresidents only
  - •3,016 permits to residents only
  - •690 unallocated (chance)
  - •24% available to nonresidents
- ✓5% received by nonresidents

8

Proposal 134

Moose — 24% of drawing permits available to nonresidents

✓Most draw permits for nonresidents are where residents are less restricted

- General season
- Registration Permit
- Longer season
- Less restrictive bag limits

9

Proposal #134

Allocate Region 3 draw hunts

–90% of permits to residents

Department Recommendation:

No Recommendation (Allocation)

10

Proposal #134

Questions?

11

Proposal #135

Allocate Region 3 drawing permits
–90% of permits to residents

Department Recommendation:
Take No Action

12

Resident hunter
grizzly bear tag fee exemptions
Region 3 exemptions

- Subsistence
- General season

Resident hunter grizzly bear tag fee exemptions

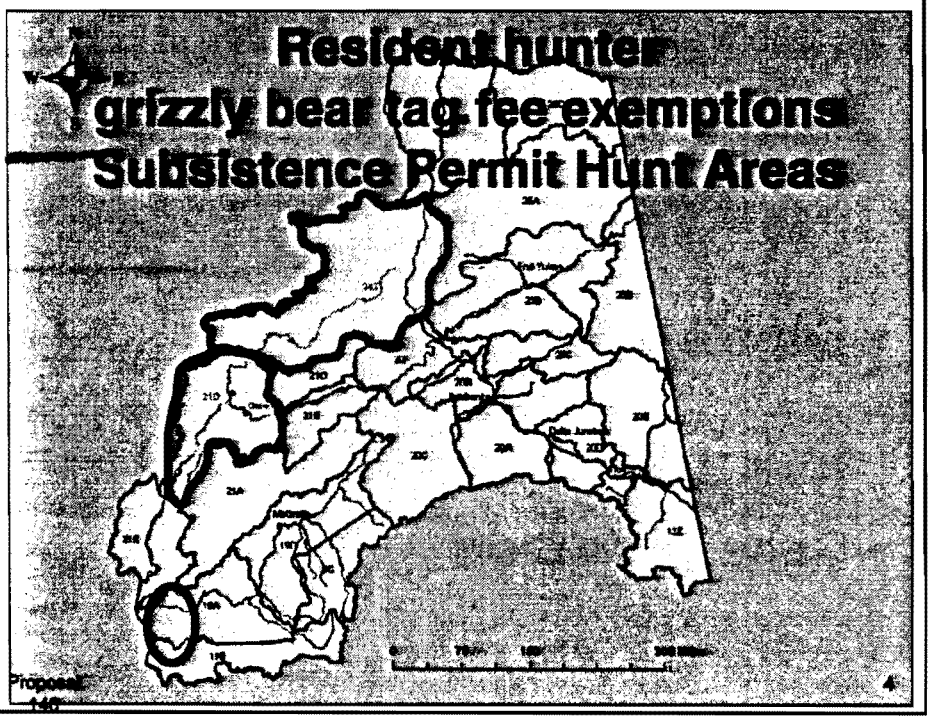
Subsistence Tag Fee Exemptions

- ❖Units 19A and 19B (downstream/ including Aniak River drainage),
- ❖21D, and 24

- Subsistence use of brown bears for food
- Traditional treatment of bear skulls that is inconsistent with sealing requirements.
- 67 permits in RY06–RY10
- 3 bears taken

Proposal 140

3



Proposal 140

4

Resident hunter grizzly bear tag fee exemptions

General Season Resident Tag Fee Exemptions

- All Game Management Units
  - Exemptions before 2010
  - New exemptions in 2010

Proposal 140

5

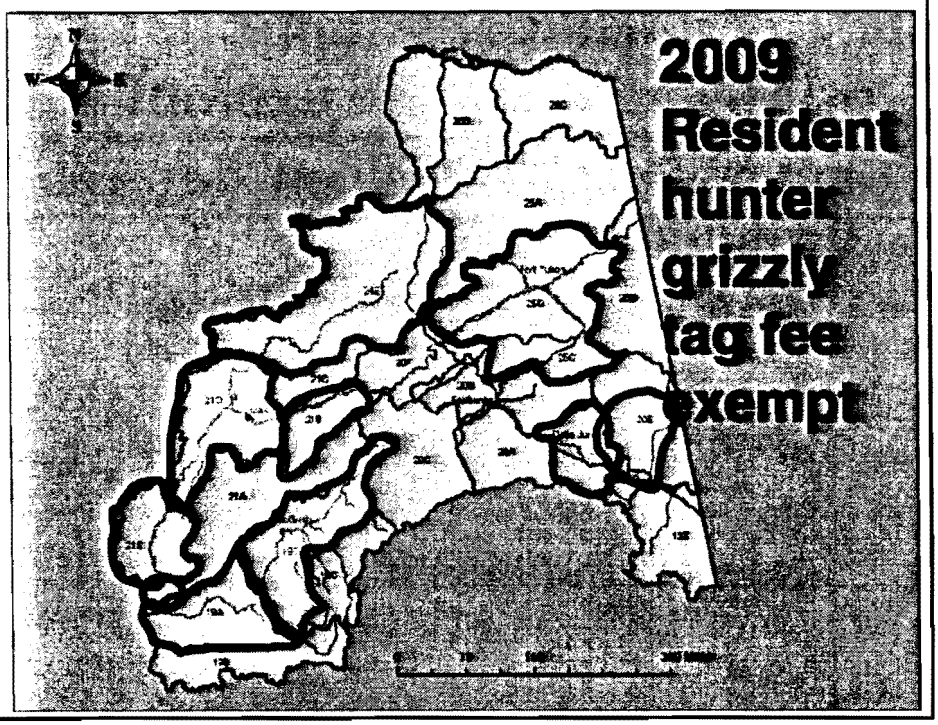
Resident hunter grizzly bear tag fee exemptions

General Season

- Exemptions before fall 2010
  - Units 19A, 19D, 20D, 20E (outside Y–C Preserve), 21B, 21D, 21E, 25C, 25D
  - First exempt dates: 1998 to 2006
    - Increase opportunity
    - Improve calf survival (moose/caribou)
    - Improve reporting
  - Harvest changed little
  - Complicated regulations

Proposal 140

6



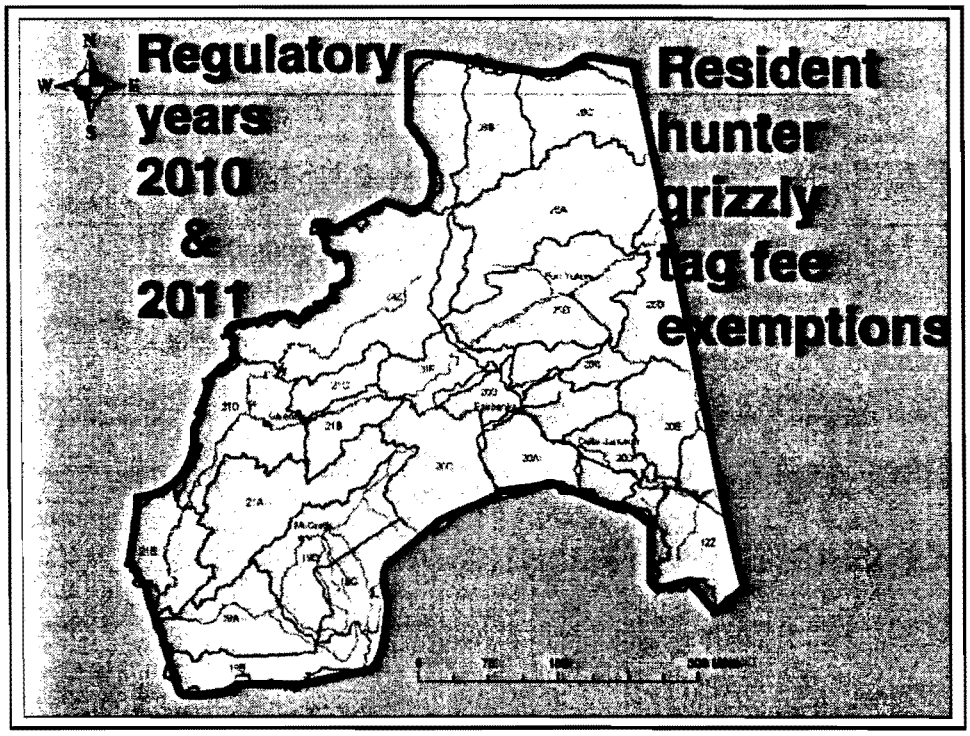
Resident hunter grizzly bear tag fee exemptions

General Season

- New exemptions in fall 2010
  - All other units
    - (12, 19B, 19C, 20A–20C, 20E [remainder], 20F, 21A, 21E, 21C, 24A–24D, 25A–25B, 26C)

–Simplify regulations

–Maximize resident opportunity



Resident hunter grizzly bear tag fee exemptions

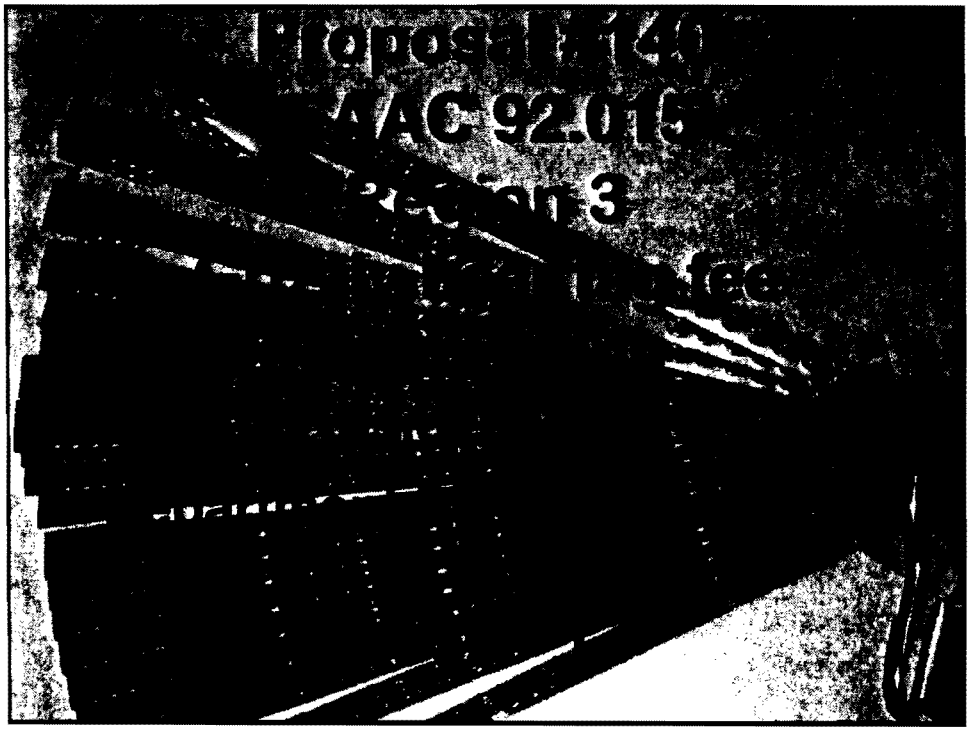
- Resident grizzly bear tag fee exemptions
  - NO IMPACT on grizzly bear harvest in Region III
- 258 bears in RY05–RY09 (annual average)
- 249 bears harvested in RY10

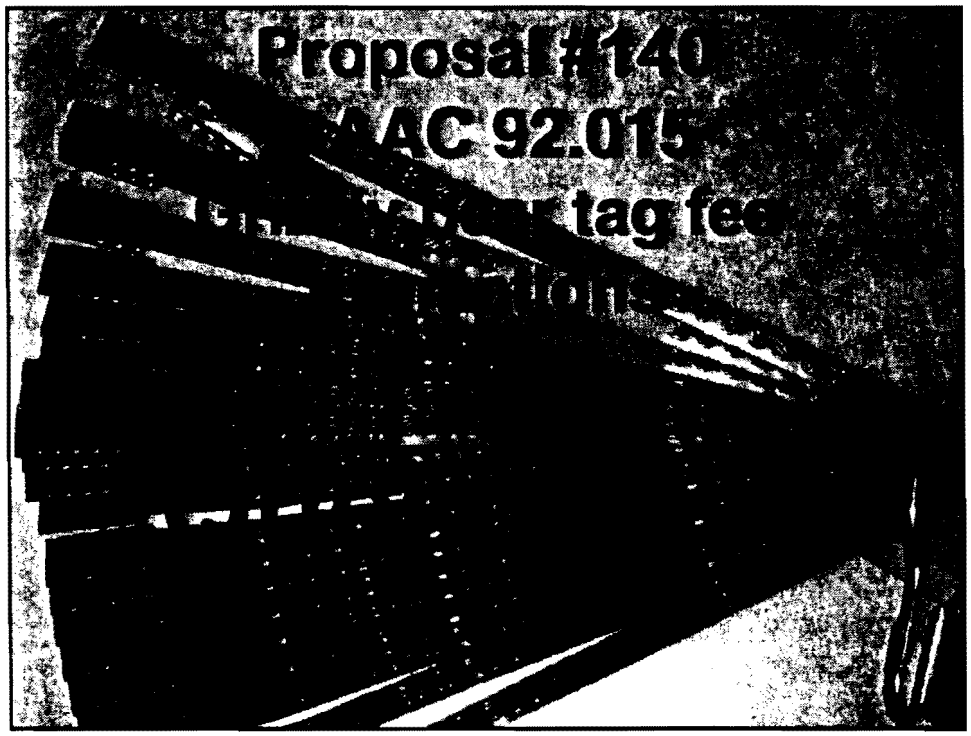
Resident hunter grizzly bear tag fee exemptions

- Grizzly bear populations are stable
- Manage for maximum opportunity
- Regulate harvest with seasons, bag limits
- Simplify regulations
- Facilitates legal harvest in rural areas
- Subsistence Registration permit hunt

Proposal 140

11




Proposal #140
AC 92.015
tag fee

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Page

Proposal 152

Open early youth seasons region-wide

–All big game species

–Bag counts against adult's limit

• No Recommendation (allocation)

1

Early-season Youth Hunts

- Allocation issue best determined case-by-case
  - To ensure that added youth seasons do not harm specified populations
    - Low populations

2

Allocation Issue

152

Department is not opposed,

- **If new youth hunts**
  - **in keeping with sustained yield**
  - **will not negatively affect drawing and Tier I & II permit hunts**

3

Youth Hunting Opportunities

152

- **Seasons before school:**
  - **black bear**
  - **grizzly bear**
  - **caribou: Central Arctic, Macomb**
  - **moose: early antlerless draw**
  - **sheep**
  - **small game**

4

152

Youth Moose Hunting Opportunities in Units 20A, 20B

- Long General Seasons

5

Early Youth Hunt History

March 2002,

- Advisory committees supported Youth Seasons
  - Board passed
    - »Unit 20B moose Aug 15–31
    - »Bison Range Youth Hunt MA

6

Early Youth Hunt History

- March 2004, board eliminated youth season for moose in Unit 20B based on public input:
  - –Unfair advantage
  - –Unsustainable harvest
  - –Magnet to all hunters
  - –Already lots of opportunity

7

Early Youth Hunt History

- BRYHMA: only remaining youth hunt (moose) in Region 3
  - –Drawing: 1 per lifetime
  - –September season
  - –4-day weekend assigned
  - –Benefits bison management
  - –Safety: Delta Bison Range workers

8

Proposal 152

Open early youth seasons region-wide

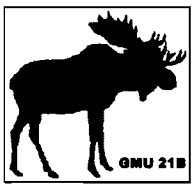
–All big game species

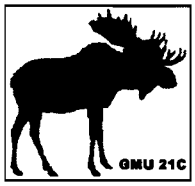
–Bag counts against adult's limit

- No Recommendation
  - –Allocation Issue

9

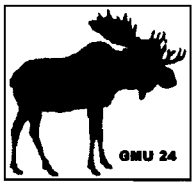
RC 90

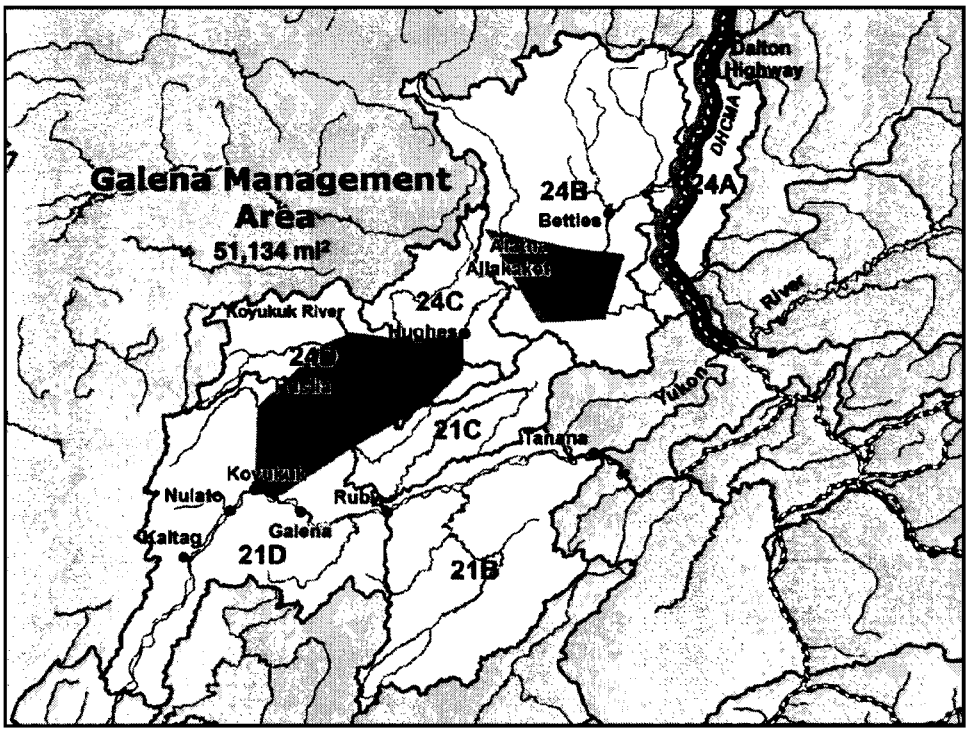




Galena Management Area Overview

Glenn Stout – Area Biologist
Nate Pamperin – Assistant Area Biologist
Carl Roberts – Wildlife Technician
Stephanie Sweetsir – Off. Asst.

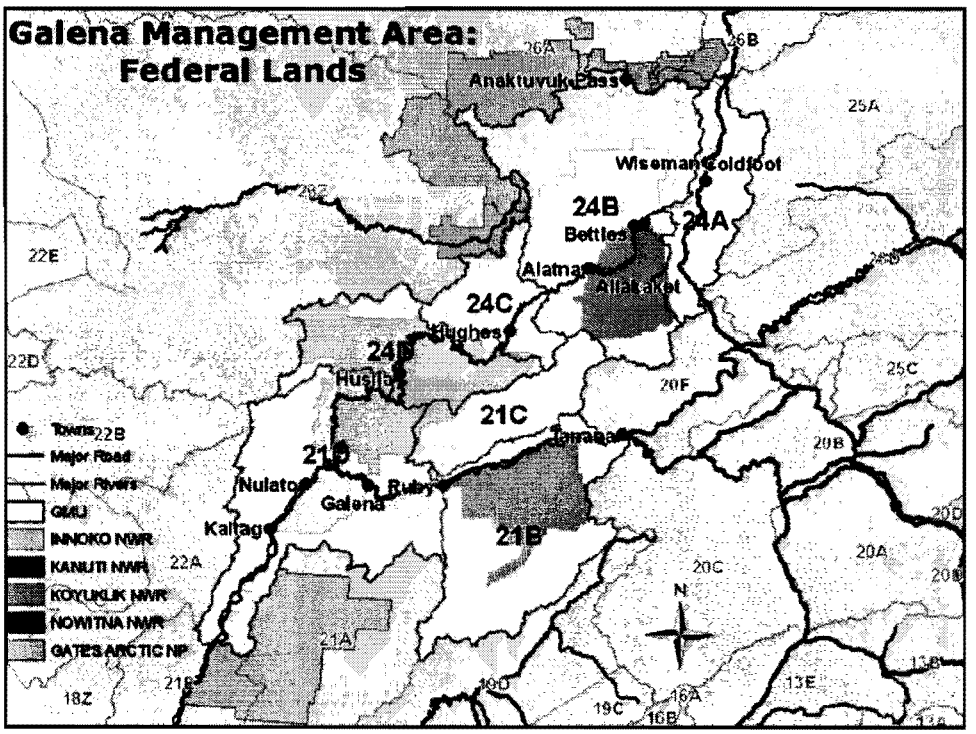




Koyukuk and Kanuti CUAs

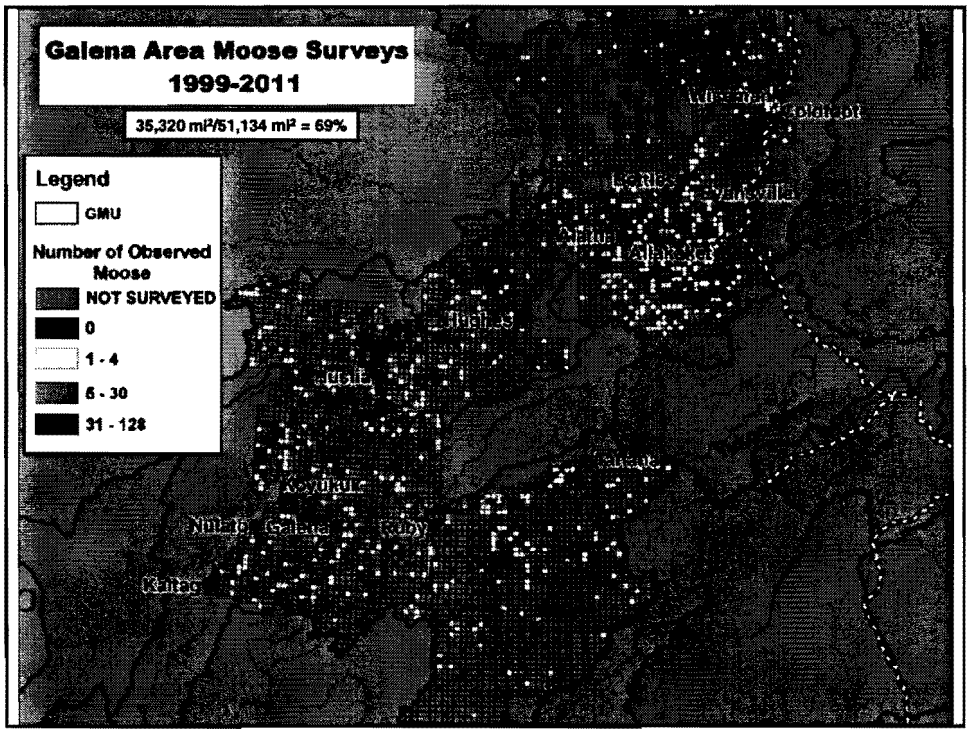
Original Intents

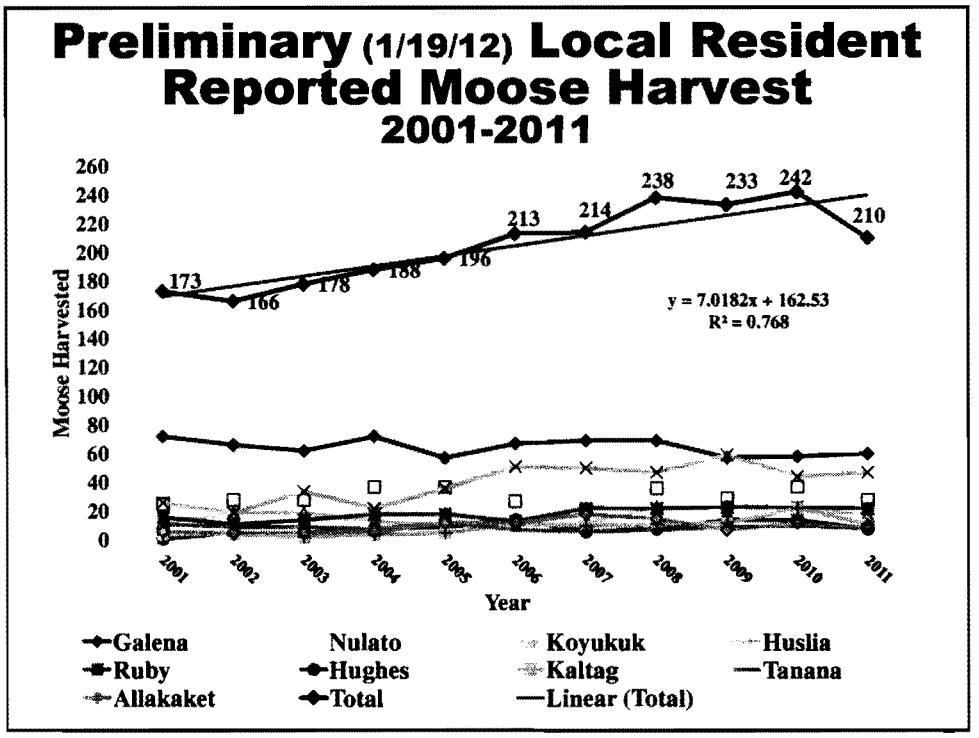
- **Koyukuk Controlled Use Area**
  - Established in March 1978, petition to rescind Nov. 1978
  - Original Management Problems Identified in 1978 Dept. Analysis
    - *Lack of moose data*
    - *Lack of harvest data*
    -] *Competition was "perceived"*
    - *Local vs. Non-local conflict (boats vs. planes)*
    - *Airplane hunters perceived to be wasting meat*
    - *Unreported year-long harvest (poor reporting/illegal harvest)*
    - *Poor calf survival concerns*
  - Registration hunts in 1996
  - Working Group Planning effort in 2000 (CUAs are important program components; Drawing permit system 2000-04)
- **Kanuti Controlled Use Area**
  - Established in 1979 (still searching Archives for complete records)
  - Apparently established on similar basis as Koyukuk CUA

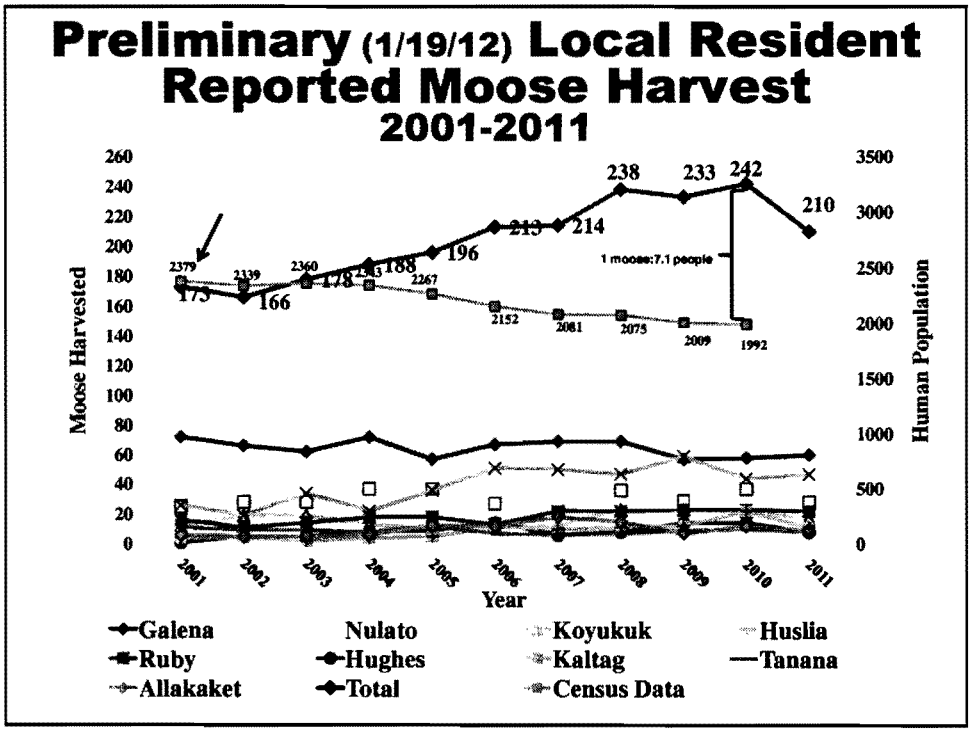


Galena Area Overview

Species	Status	Proposals
Black Bears	Stable (conflicts)	0
Grizzly Bears	Stable-Increasing	1
Caribou	Stable	1
Moose	"Stable"	4
Sheep	Stable	0
Wolves	Stable (low harvest)	2
Furbearers	Stable (marten!)	1
Small Game	Stable (down cycle)	0




Preliminary (1/19/12) Local Resident Reported Moose Harvest
2001-2011
Moose Harvested
Year
173
166
178
188
196
213
214
238
233
242
210
y = 7.0182x + 162.53
R² = 0.768
Galena
Nulato
Koyukuk
Huslia
Ruby
Hughes
Kaltag
Tanana
Allakaket
Total
Linear (Total)


Preliminary (1/19/12) Local Resident Reported Moose Harvest
2001-2011
Moose Harvested
Human Population
Year
173
166
178
188
196
213
214
238
233
242
210
2379
2339
2360
2267
2152
2081
2075
2009
1992
1 moose:7.1 people
Galena
Nulato
Koyukuk
Huslia
Ruby
Hughes
Kaltag
Tanana
Allakaket
Total
Census Data

Galena Area Overview

Moose Management Issues

- Intensive Management Plan for 24B
  - Upper Koyukuk River Emphasis
- Increasing Hunter Conflicts
- Hunter Compliance with Antler Cutting

Galena Mgt. Area

BOG Proposals

2012

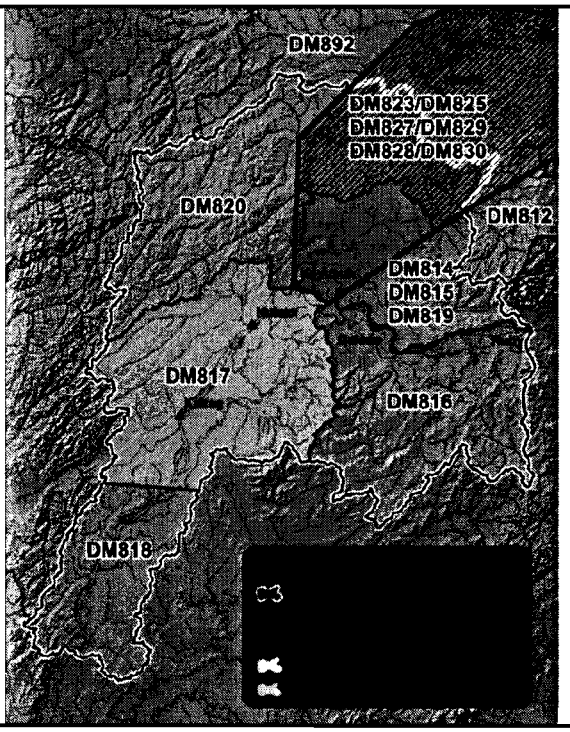
Proposal #161

Split the Moose Drawing Hunt DM817 into Two Permit Hunts

ADF&G – Do Not Adopt

RAC – Do Not Adopt MYAC – Adopt

KRAC – Take No Action



DM817 permit hunt

RY06 through RY10

Regulatory year	Permits issued	Percent hunted	Percent unsuccessful hunters	Percent successful hunters	Total harvest	
2006–2007	16	75	25	75	9	
2007–2008	31	64	75	25	5	
2008–2009	31	45	50	50	7	
2009–2010	28	43	58	42	5	
2010–2011	31	42	61	39	7	
	Avg. =	54			6.6	Avg.
					5.5	After Sept. 15

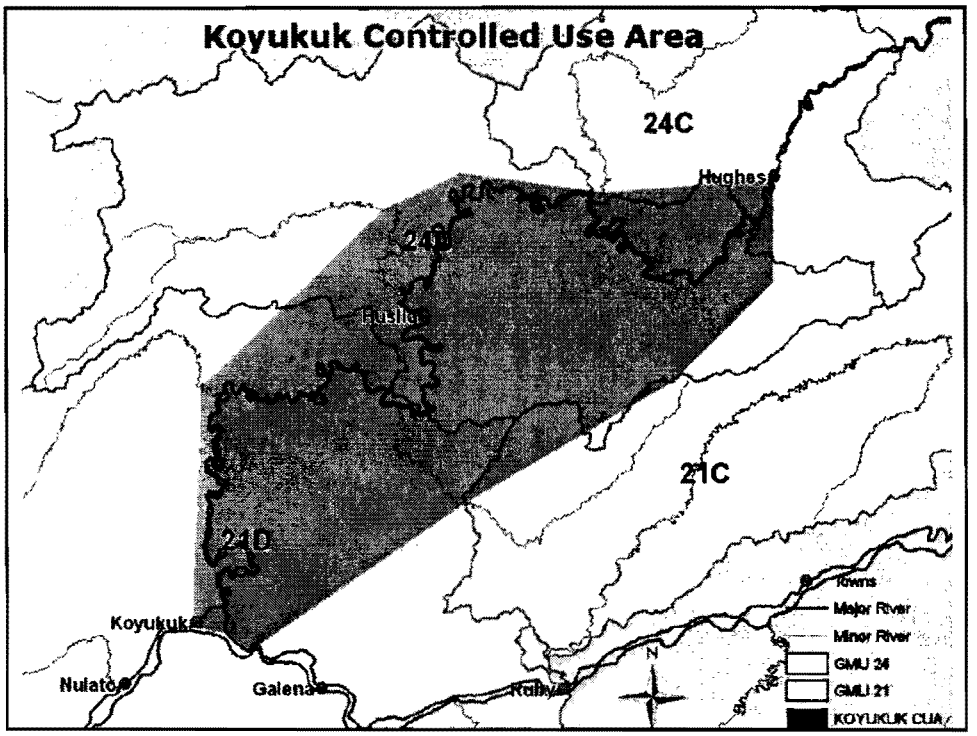
Proposal #162

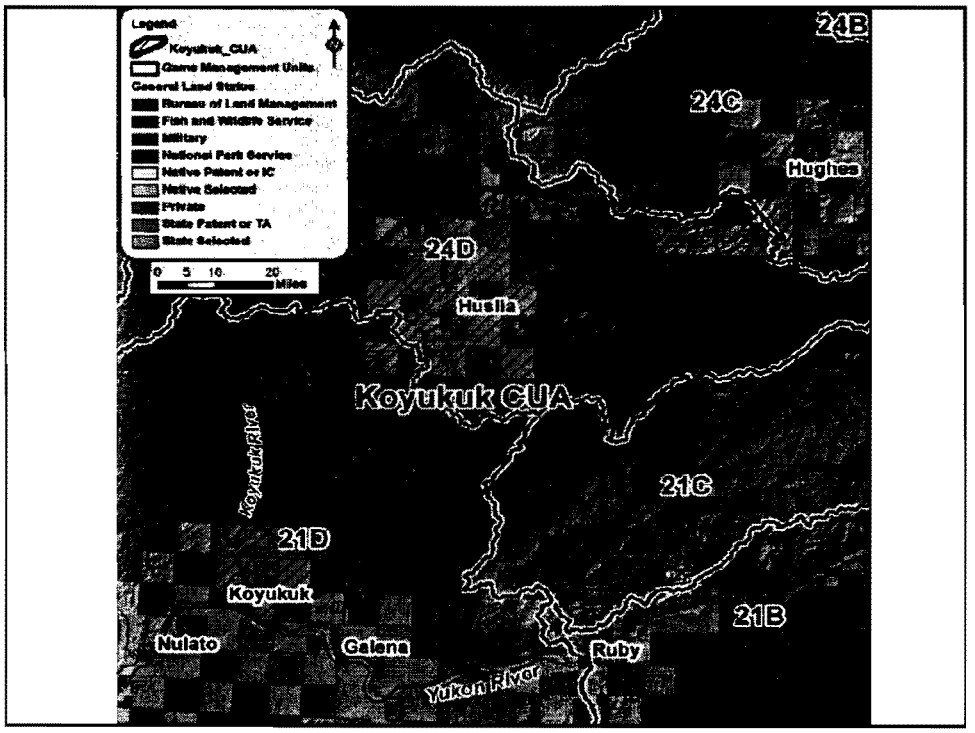
Allow 10% of Koyukuk CUA Drawing Permits to Use Aircraft; Allow Guided Permits to Choose Method of Transport

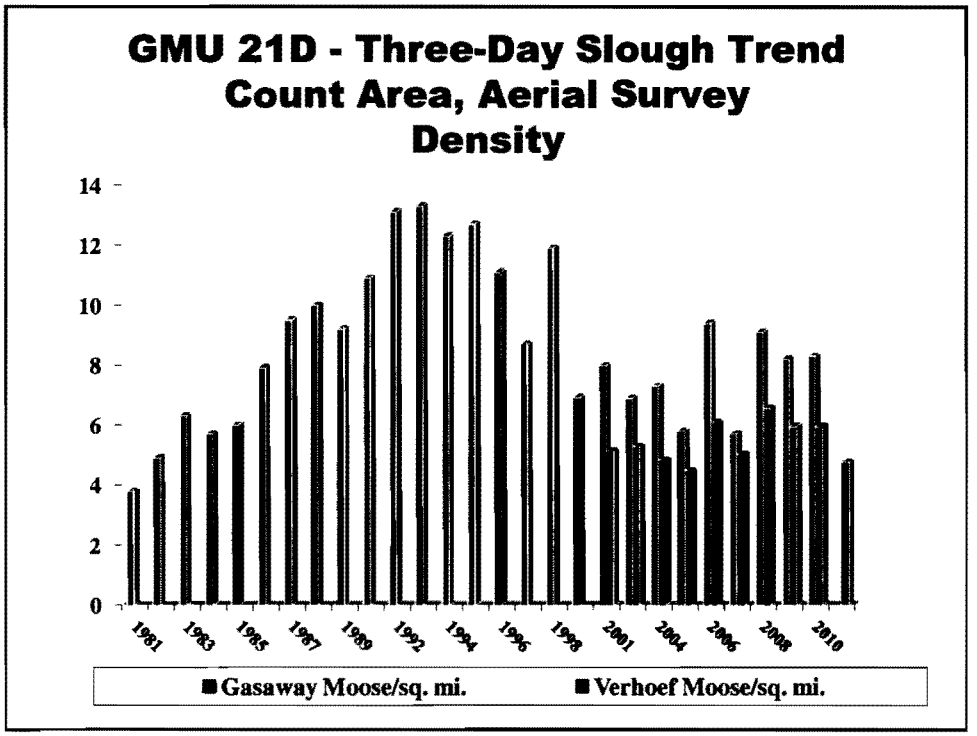
ADF&G – No Recommendation

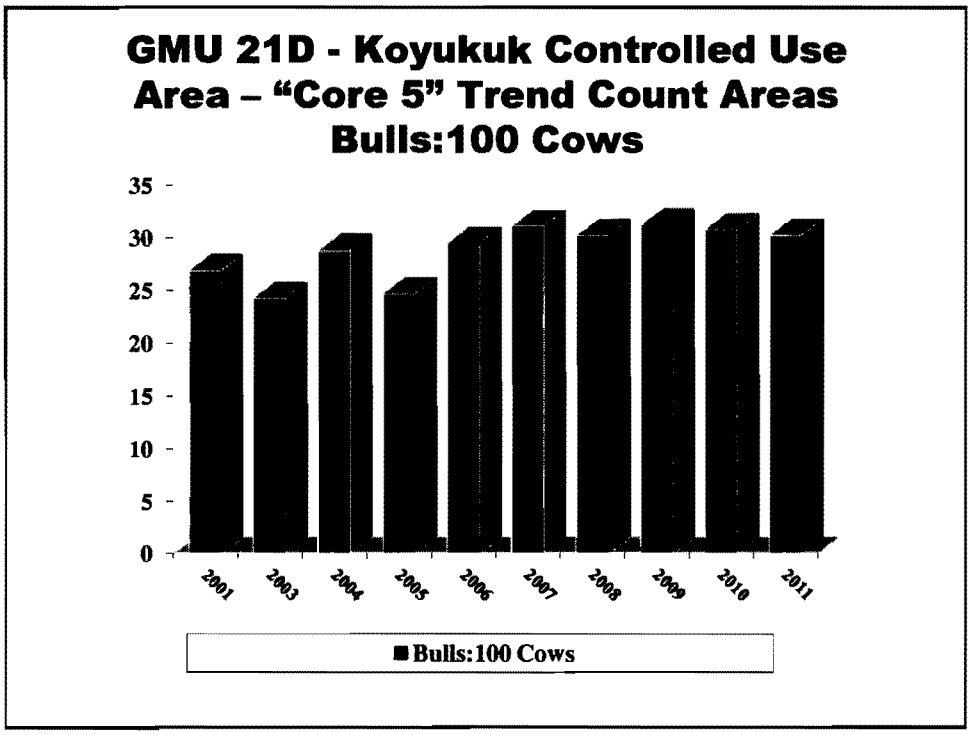
RAC – Amend and Adopt MYAC – Do Not Adopt

KRAC – Do Not Adopt


Koyukuk Controlled Use Area
24C
Hughes
24B
Huslia
21C
24D
Koyukuk
Nulato
Galena
Ruby
Towns
Major River
Minor River
GMU 24
GMU 21
KOYUKUK CUA


Legend
Koyukuk_CUA
Game Management Units
General Land Status
Bureau of Land Management
Fish and Wildlife Service
Military
National Park Service
Native Patent or IC
Native Selected
Private
State Patent or TA
State Selected
0 5 10 20 Miles
24B
24C
Hughes
24D
Huslia
Koyukuk CUA
Koyukuk River
21C
21D
Koyukuk
21B
Nulato
Galena
Ruby
Yukon River


GMU 21D - Three-Day Slough Trend Count Area, Aerial Survey Density
14
12
10
8
6
4
2
0
1981
1983
1985
1987
1989
1992
1994
1996
1998
2001
2004
2006
2008
2010
Gasaway Moose/sq. mi.
Verhoef Moose/sq. mi.


GMU 21D - Koyukuk Controlled Use Area – "Core 5" Trend Count Areas Bulls:100 Cows
35
30
25
20
15
10
5
0
2001
2003
2004
2005
2006
2007
2008
2009
2010
2011
Bulls:100 Cows

Analysis of 2012 KCUA Permits

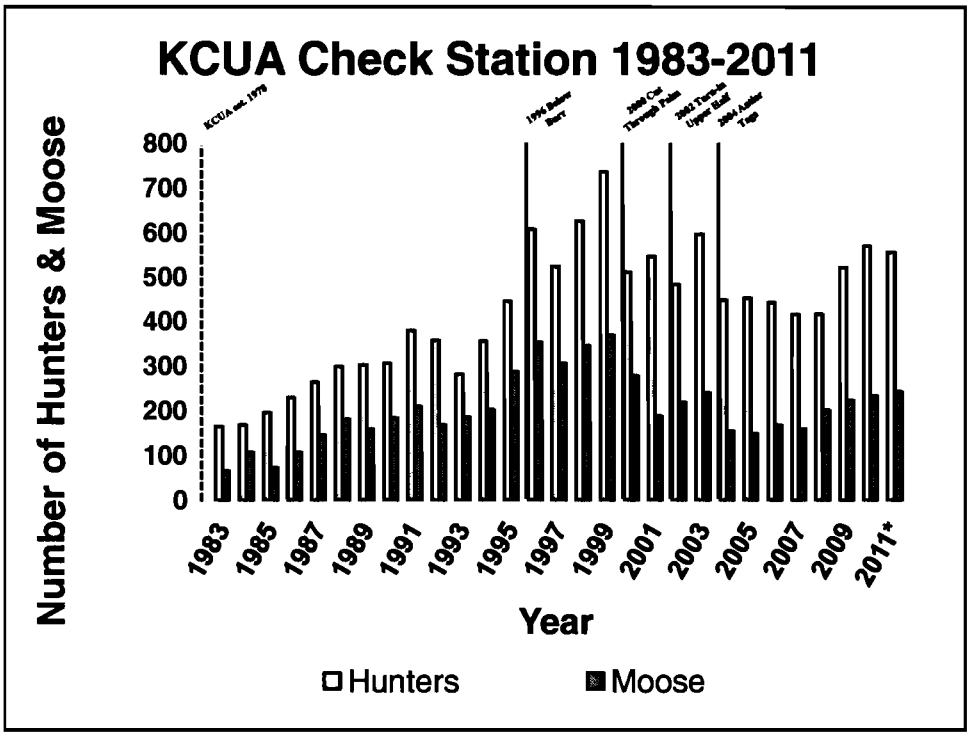
- 2012 Allocation = 118 Total Drawing Permits (6 Hunts)
  - 94 Resident : 24 Non-resident
    - DM828 = 47 R-early hunt
    - DM830 = 47 R-late hunt
    - DM823 = 6 NR, guided, early
    - DM825 = 6 NR, guided, late
    - DM827 = 6 NR, non-guided, early
    - DM829 = 6 NR, non-guided, late

      Total = 118
  - Proposed Fly-in allocation
    - DM828/830 (@ 10%) = 10 permits
    - DM823/825 (optional) = up to 12 permits
    - DM827/829 (N/A) = 0 permits

Drawing Permit Success

Koyukuk Controlled Use Area

Reg-Year	# Hunters	# Moose	% Success
2000-2001	152	109	72
2001-2002	118	57	48
2002-2003	104	78	75
2003-2004	143	91	64
2004-2005	21	12	57
2005-2006	27	18	67
2006-2007	32	23	72
2007-2008	28	27	96
2008-2009	45	32	71
2009-2010	53	36	68
2010-2011	90	57	63
2011-2012*	88	68	77
			Avg. = 69%



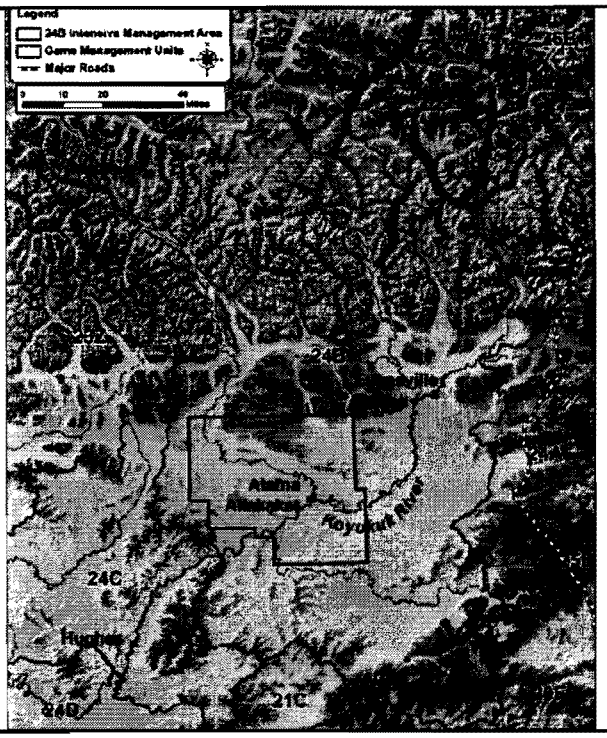
Proposal #163

Intensive Management Plan for 24B

ADF&G – Amend and Adopt

RAC – Adopt MYAC – Adopt

KRAC – Adopt



24B Upper Koyukuk Management Area

- **Origination of 24B IM Program**

<u>Koyukuk River Moose Hunters Working Group</u> identified Predation Control in their 2001 Plan.

<u>GOAL 3</u> *"Manage predation on moose so that moose abundance can be maintained or increased, harvest levels by humans can be maintained, and populations of predators remain viable."*

<u>Action 3.1.7</u> *"The KMWG recommends that predator control, including aerial wolf control, be implemented to accomplish the objectives of the KRMMP and to be consistent with state Intensive Management statutes (AS 16.05.255 [e-g]). The KMWG further recommends that the Board of Game direct the Department to prepare an Intensive Management Plan for the Koyukuk Basin."*

- **Regulatory History**

2006 BOG actions: Subdivide 24, IM Objectives

24B Upper Koyukuk Management Area

- Baseline Data Collection
  - Harvest
  - Moose Population Surveys
  - Adult telemetry (surv. rates/twinning rates/mvmts)
  - Predator Populations
  - Habitat
  - Modeling
- Feasibility Assessment
- Operational Plan
- 5AAC 92.125 Intensive Management Plan

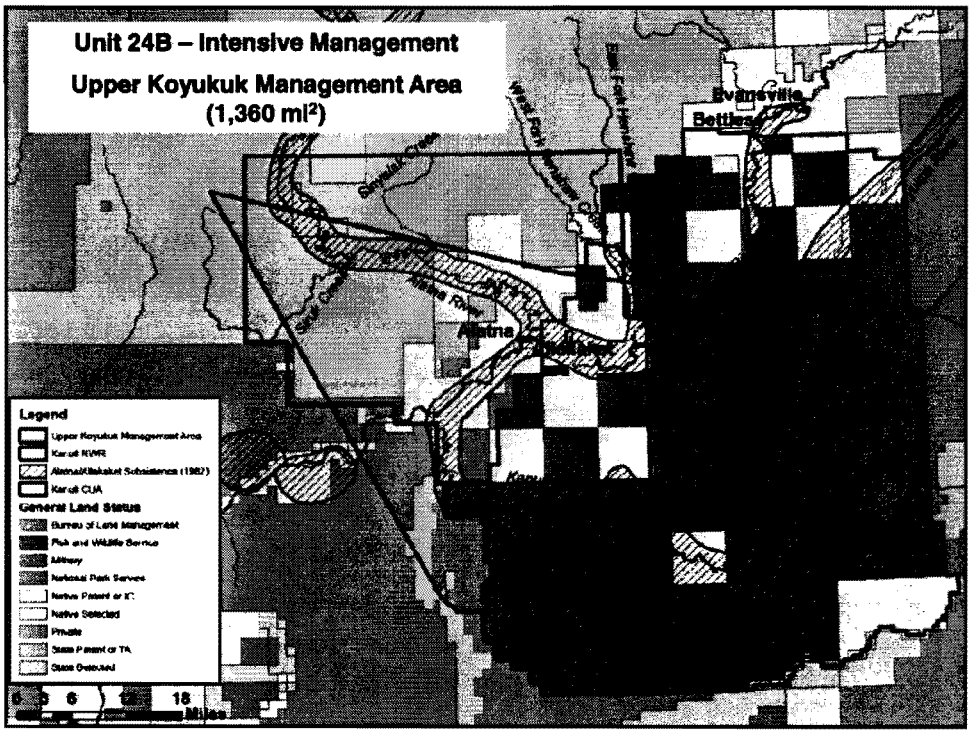
24B Upper Koyukuk Management Area

"PROGRAM CONCEPTS"

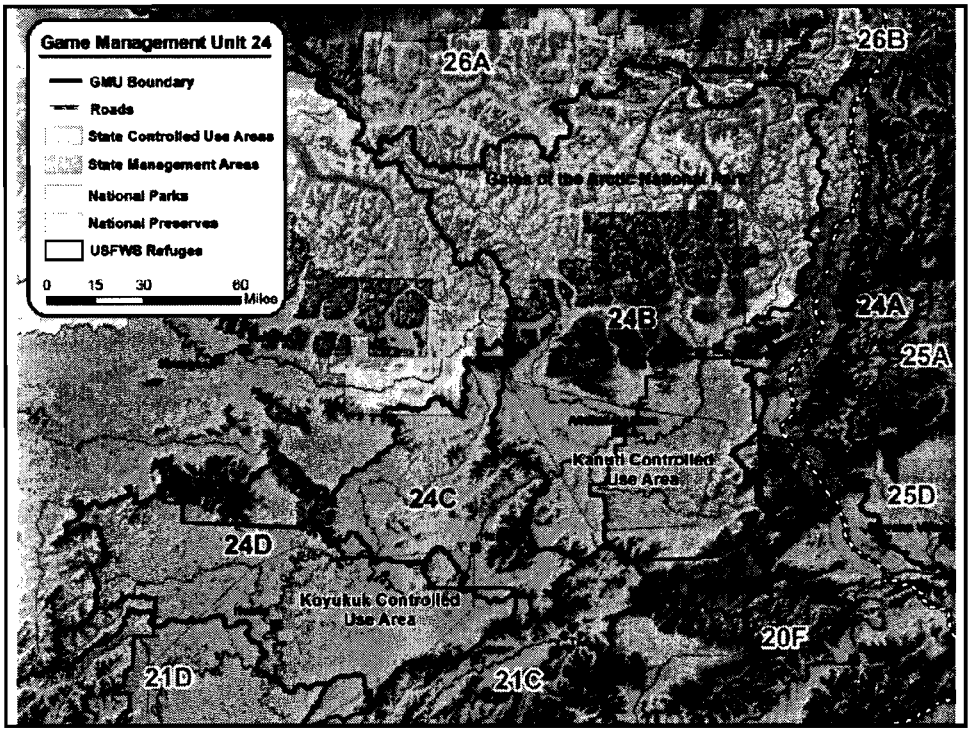
1) Reallocation of moose...wolves to people. The scale of the program is small and IM objectives are not expected to be achieved
2) Not just more moose...but decreased hunter effort, particularly for local hunters
3) Harvest will be used as a metric to evaluate treatment effectiveness...not just moose biological parameters
4) Experimental Program...opportunity to learn about; a) low density moose populations and b) applicability to similar scenarios

Key Components of UKMA Program

1. **Wolves only, no Black Bear or Grizzly Bear control (Cultural issues = important for food, unique to area)**
2. **Small program will not significantly change 24B populations (statistically detectable levels)**
3. **Population and harvest are below IM objectives, but objectives will not be met by this program*****
4. **No Predation control on USFWS/NPS Lands, but will include Native Corporation Lands**
5. **Predator control response monitoring will include Calf/Yrlg. survival, Pop. Est. surveys, Experimental non-treatment area, Harvest parameters**
6. **Assess biological and harvest data using several metrics for each**
7. **Program will emphasize efficiency and cost effectiveness (other applications)**




IM Population and
Harvest Objectives


Game Management Unit 24
GMU Boundary
Roads
State Controlled Use Areas
State Management Areas
National Parks
National Preserves
USFWS Refuges
0 15 30 60
Miles
26A
26B
24B
24A
25A
Kanuti Controlled
Use Area
24C
25D
24D
Koyukuk Controlled
Use Area
20F
21D
21C

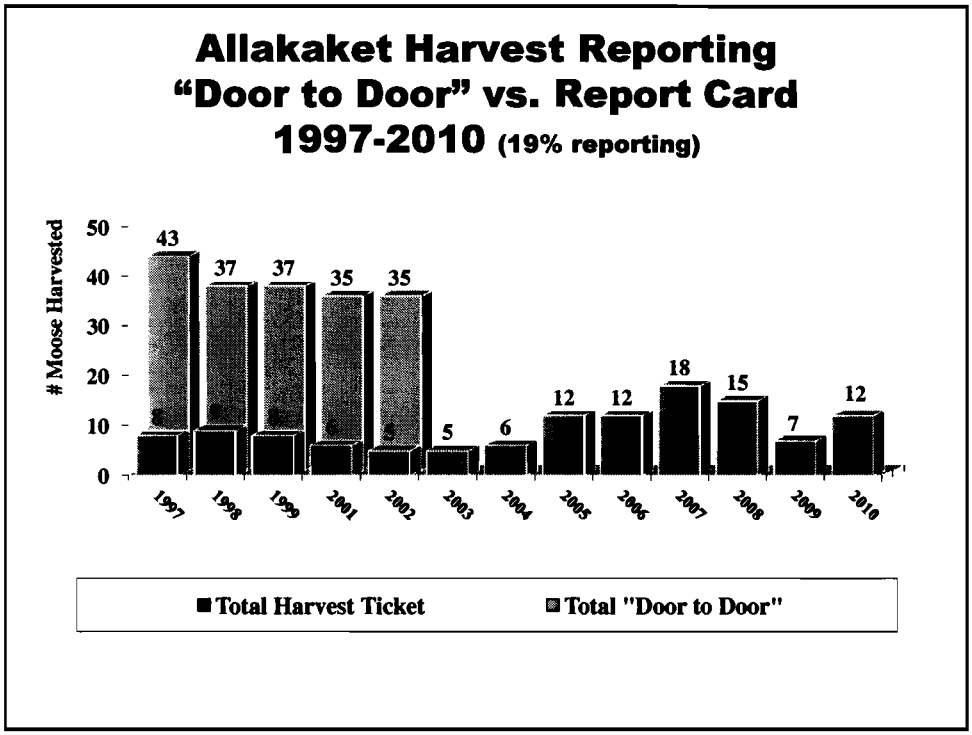
Intensive Management Objectives Population

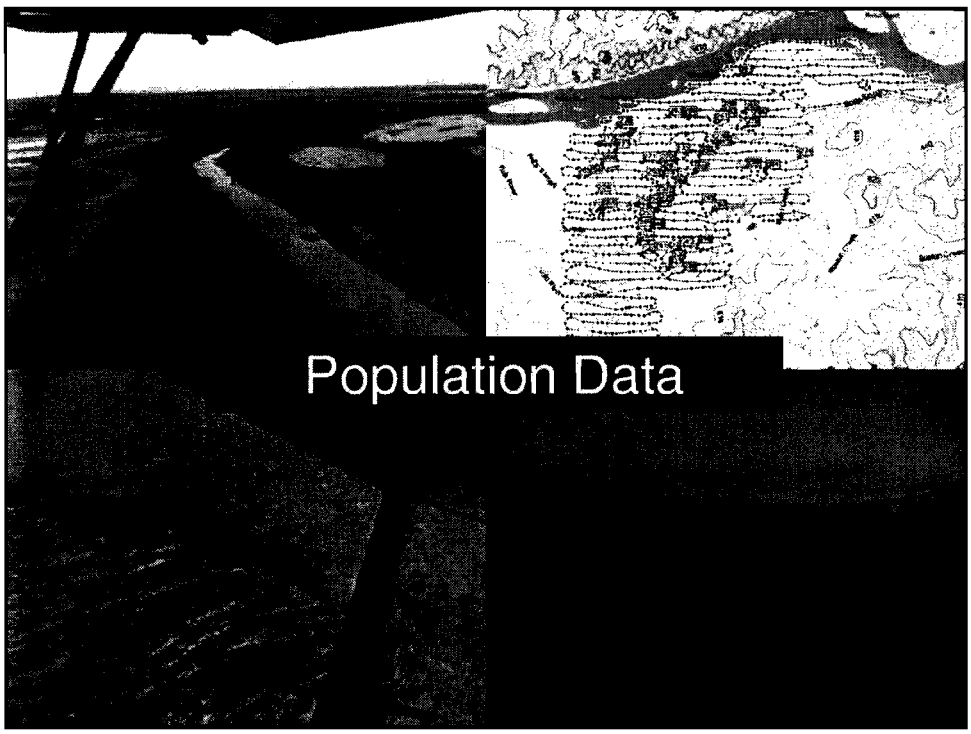
Subunit	Current Est.	IM Objective
24A	865 ± 250	1200-1500
24B	2,600 ± 800	4000-4500
24C	650 ± 130	1,000-1,500
24D	4,635 ± 350	5,000-6,000
Total	8,750 ± 1,530	11,200-13,500
Current Management Objective		10,000-12,000

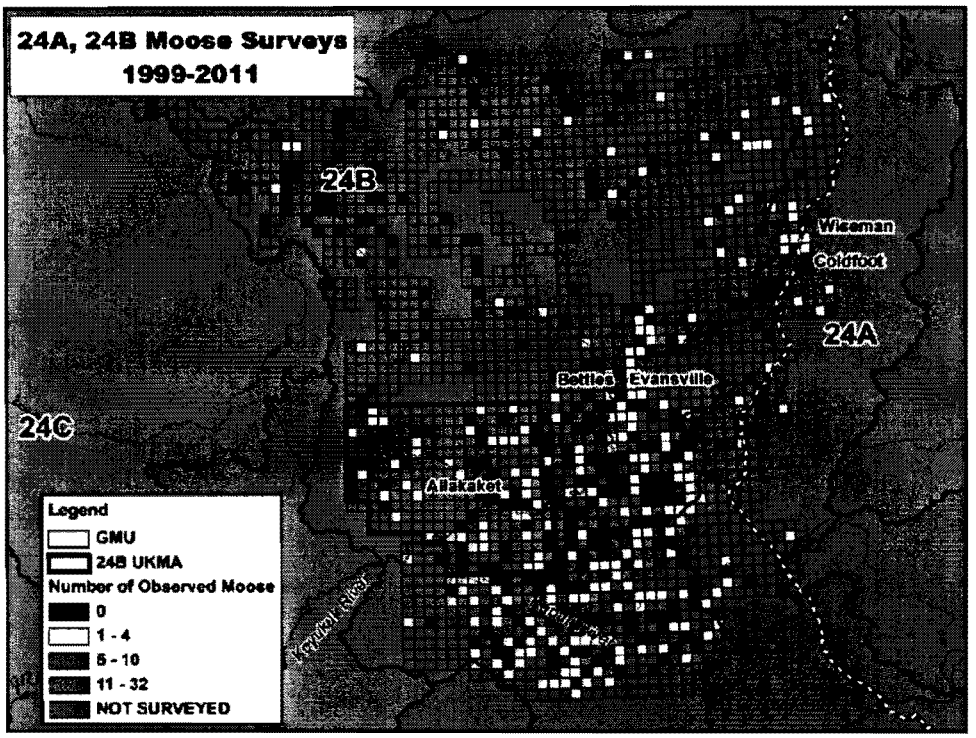
Intensive Management Objectives Harvest

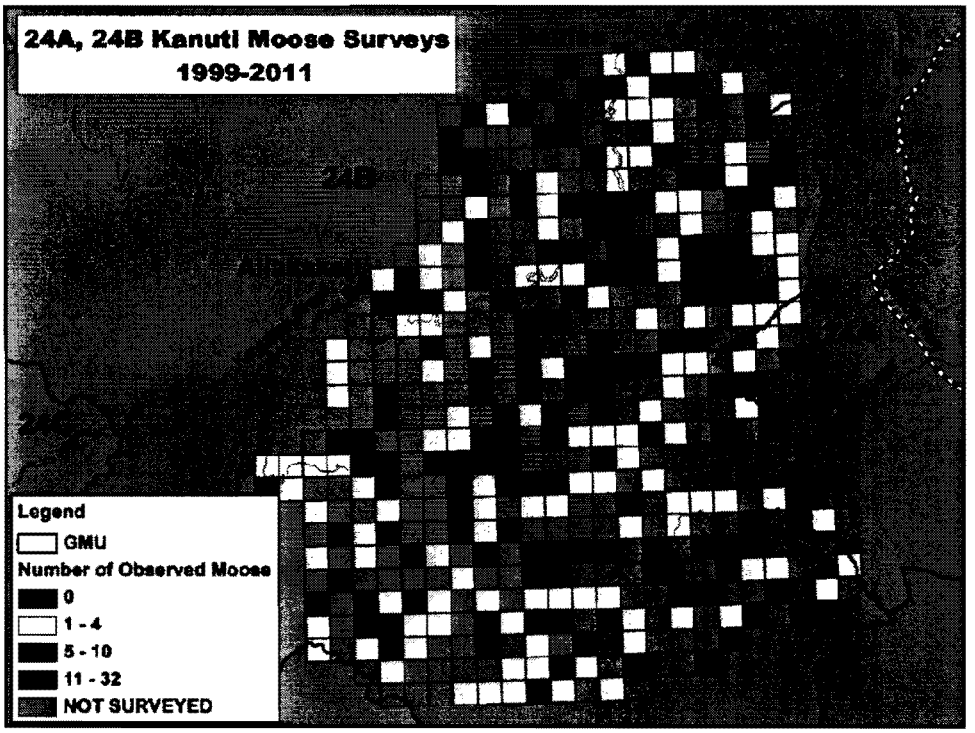
Subunit	Current Est.[a]	IM Objective
24A	30	75-125
24B	82	150-250
24C	44	50-125
24D	140	225-425
Total	296	500-925
Current Management Objective		< 360[a] or 5%

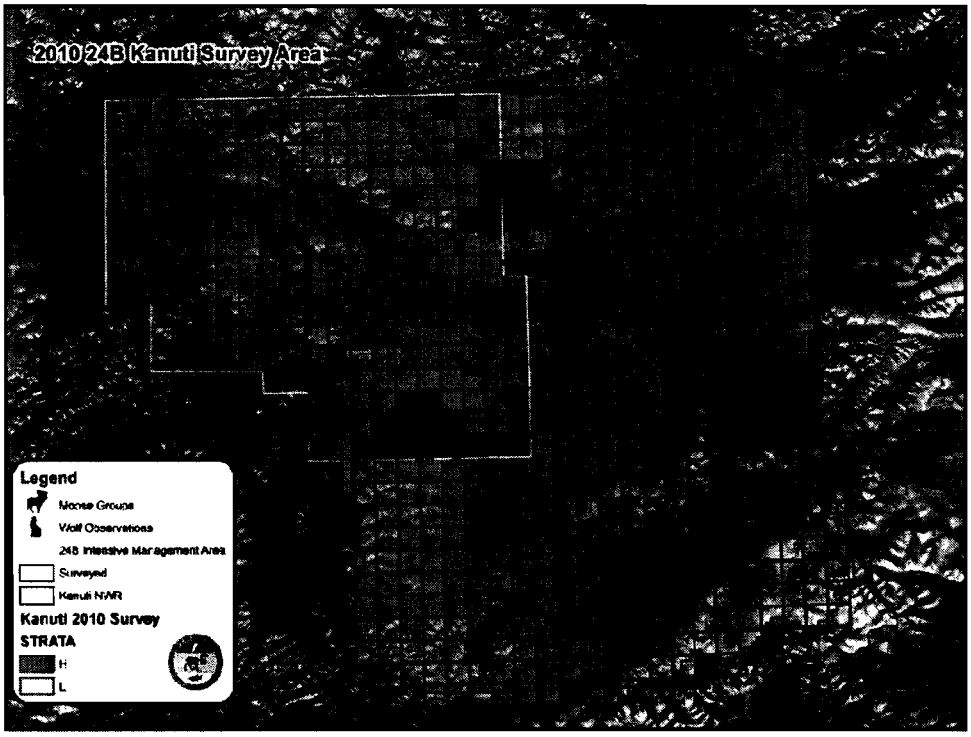
[a] Includes estimated unreported harvest

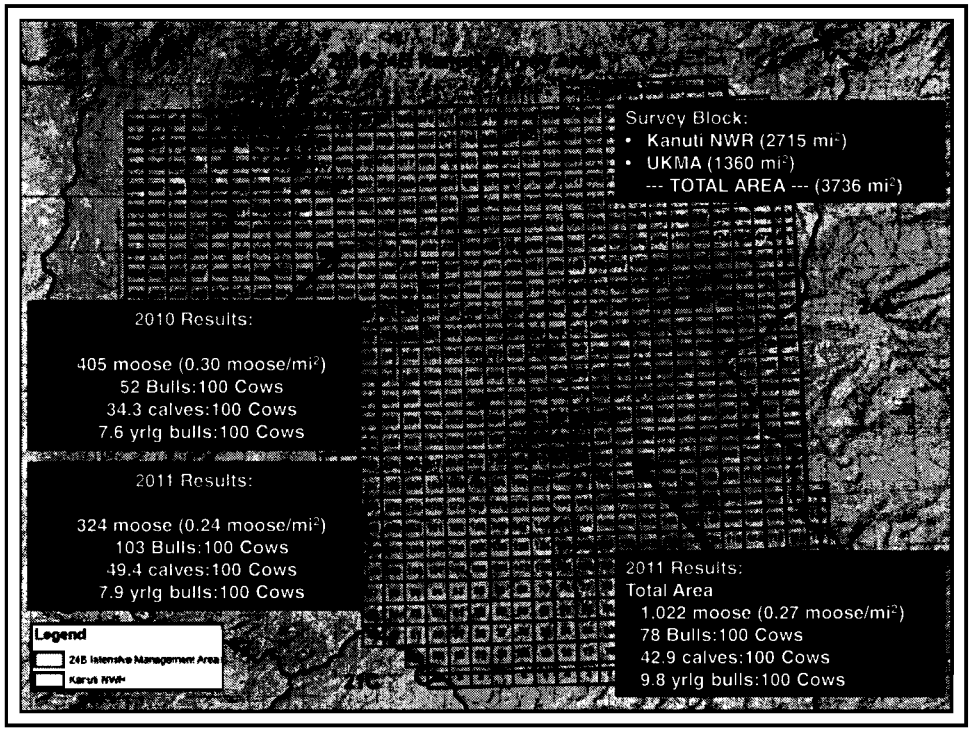

Allakaket Harvest Reporting
"Door to Door" vs. Report Card
1997-2010 (19% reporting)
Moose Harvested
50
40
30
20
10
0
43
37
37
35
35
5
6
12
12
18
15
7
12
1997
1998
1999
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
Total Harvest Ticket
Total "Door to Door"

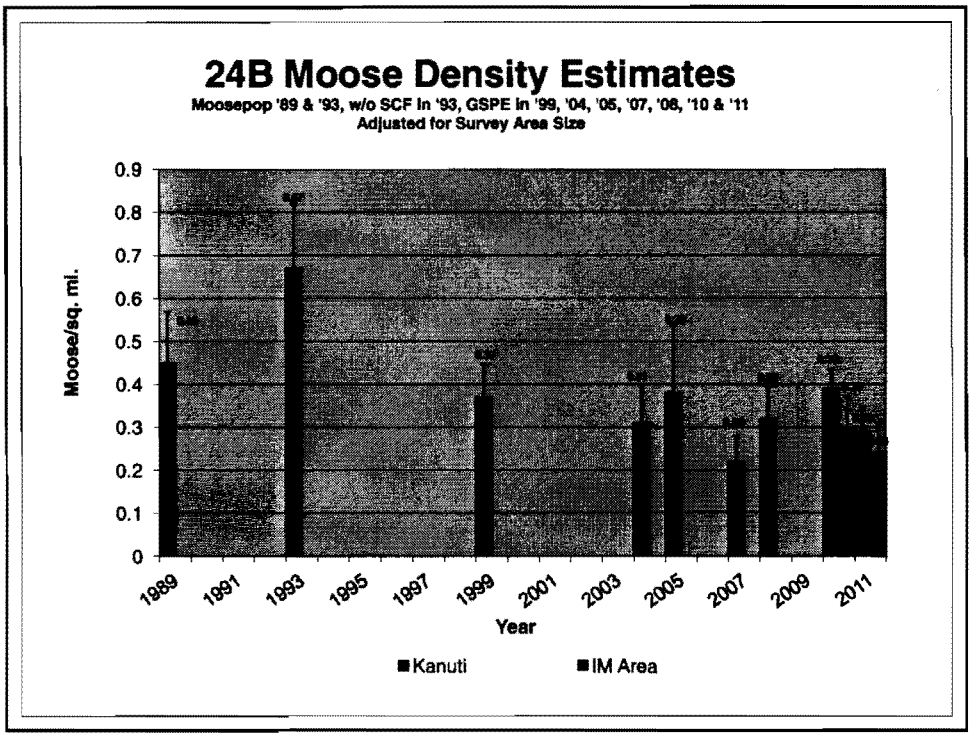

Population Data

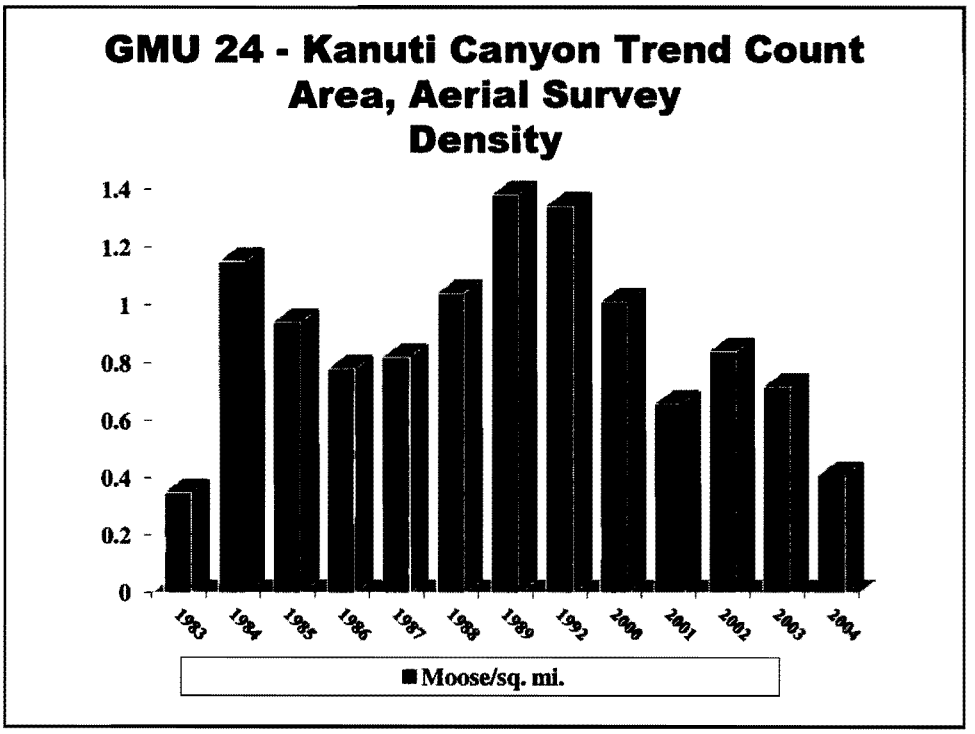

24A, 24B Moose Surveys
1999-2011
24B
Wiseman
Coldfoot
24A
Bettles
Evansville
24C
Allakaket
Legend
GMU
24B UKMA
Number of Observed Moose
0
1 - 4
5 - 10
11 - 32
NOT SURVEYED

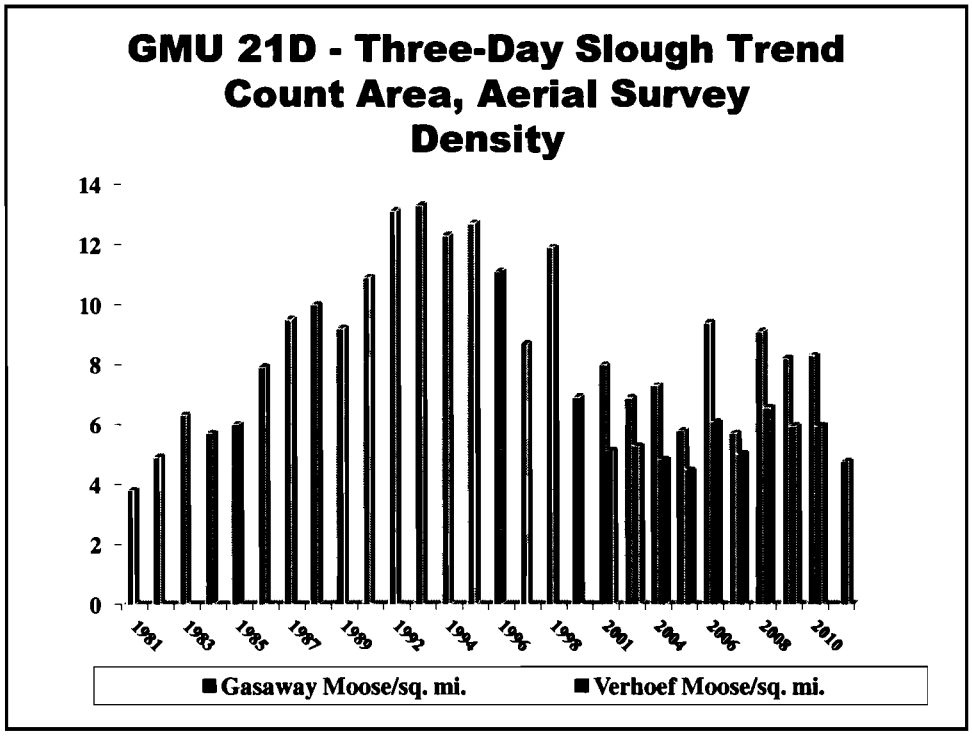

24A, 24B Kanuti Moose Surveys
1999-2011
Legend
GMU
Number of Observed Moose
0
1 - 4
5 - 10
11 - 32
NOT SURVEYED

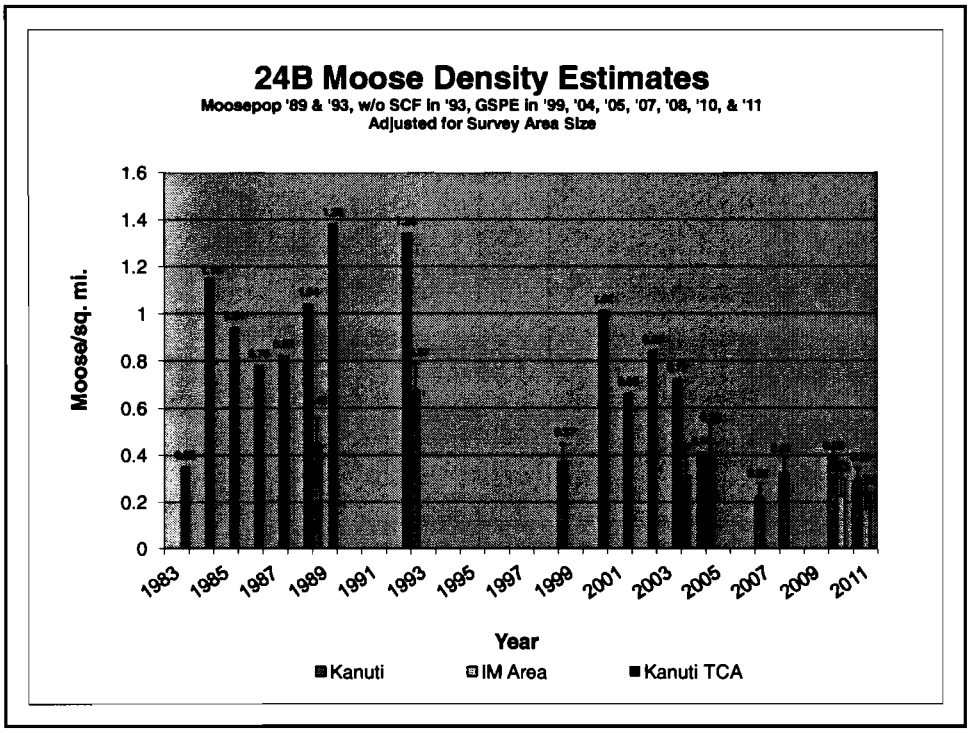

2010 24B Kanuti Survey Area
Legend
Moose Groups
Wolf Observations
24B Intensive Management Area
Surveyed
Kanuti NWR
Kanuti 2010 Survey
STRATA
H
L

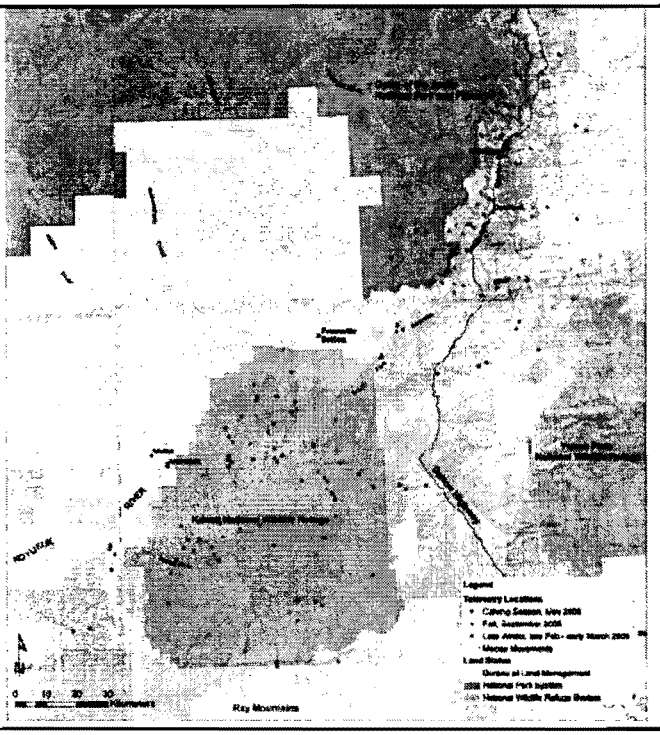

Survey Block:
• Kanuti NWR (2715 mi²)
• UKMA (1360 mi²)
--- TOTAL AREA --- (3736 mi²)
2010 Results:
405 moose (0.30 moose/mi²)
52 Bulls:100 Cows
34.3 calves:100 Cows
7.6 yrlg bulls:100 Cows
2011 Results:
324 moose (0.24 moose/mi²)
103 Bulls:100 Cows
49.4 calves:100 Cows
7.9 yrlg bulls:100 Cows
2011 Results:
Total Area
1,022 moose (0.27 moose/mi²)
78 Bulls:100 Cows
42.9 calves:100 Cows
9.8 yrlg bulls:100 Cows
Legend
24B Intensive Management Area
Kanuti NWR


24B Moose Density Estimates
Moosepop '89 & '93, w/o SCF in '93, GSPE in '99, '04, '05, '07, '08, '10 & '11
Adjusted for Survey Area Size
Moose/sq. mi.
0.9
0.8
0.7
0.6
0.5
0.4
0.3
0.2
0.1
0
1989
1991
1993
1995
1997
1999
2001
2003
2005
2007
2009
2011
Year
Kanuti
IM Area


GMU 24 - Kanuti Canyon Trend Count Area, Aerial Survey Density
1.4
1.2
1
0.8
0.6
0.4
0.2
0
1983
1984
1985
1986
1987
1988
1989
1992
2000
2001
2002
2003
2004
Moose/sq. mi.

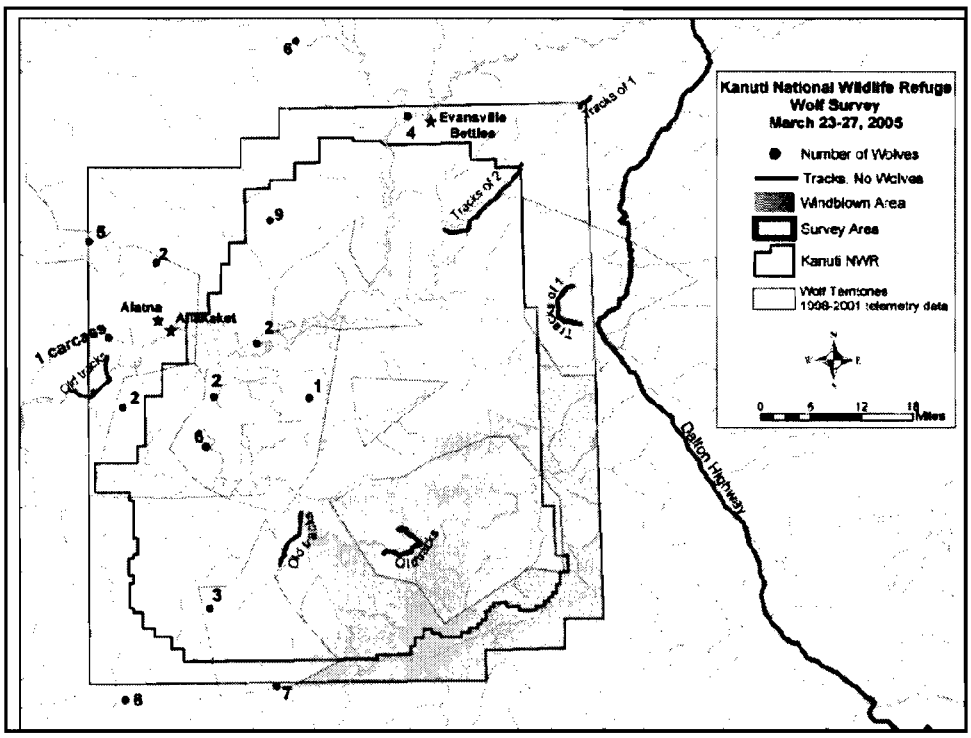

GMU 21D - Three-Day Slough Trend Count Area, Aerial Survey Density
14
12
10
8
6
4
2
0
1981
1983
1985
1987
1989
1992
1994
1996
1998
2001
2004
2006
2008
2010
Gasaway Moose/sq. mi.
Verhoef Moose/sq. mi.

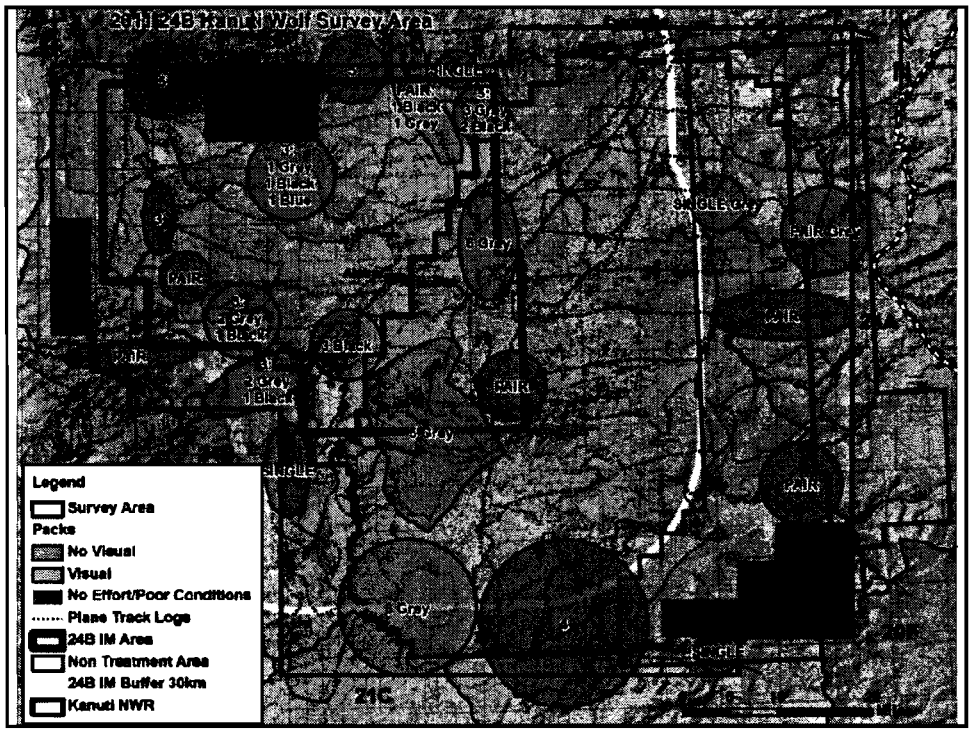

24B Moose Density Estimates
Moosepop '89 & '93, w/o SCF in '93, GSPE in '99, '04, '05, '07, '08, '10, & '11
Adjusted for Survey Area Size
Moose/sq. mi.
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
1983
1985
1987
1989
1991
1993
1995
1997
1999
2001
2003
2005
2007
2009
2011
Year
Kanuti
IM Area
Kanuti TCA



Upper Koyukuk Management Area

	Current Estimate
# Moose	405 ± 96
# Wolves	30 ± 5
# Black Bears	75 ± ?
# Grizzly Bears	25 ± ?
Harvest by hunters	10-20 moose

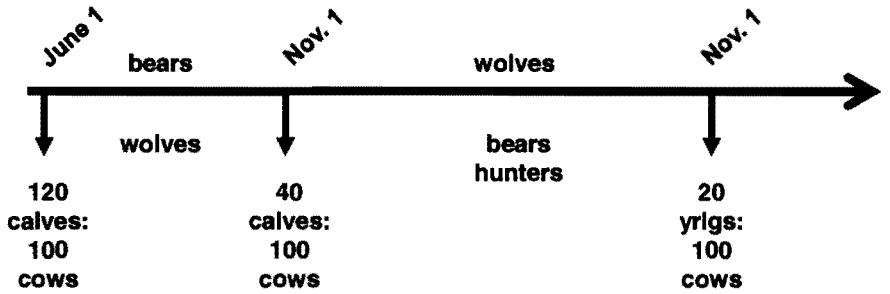

Kanuti National Wildlife Refuge
Wolf Survey
March 23-27, 2005
Number of Wolves
Tracks, No Wolves
Windblown Area
Survey Area
Kanuti NWR
Wolf Territories
1998-2001 telemetry data
Miles
Evansville
Bettles
Alatna
Allakaket
Tracks of 1
Tracks of 2
1 carcass
Old tracks
Dalton Highway

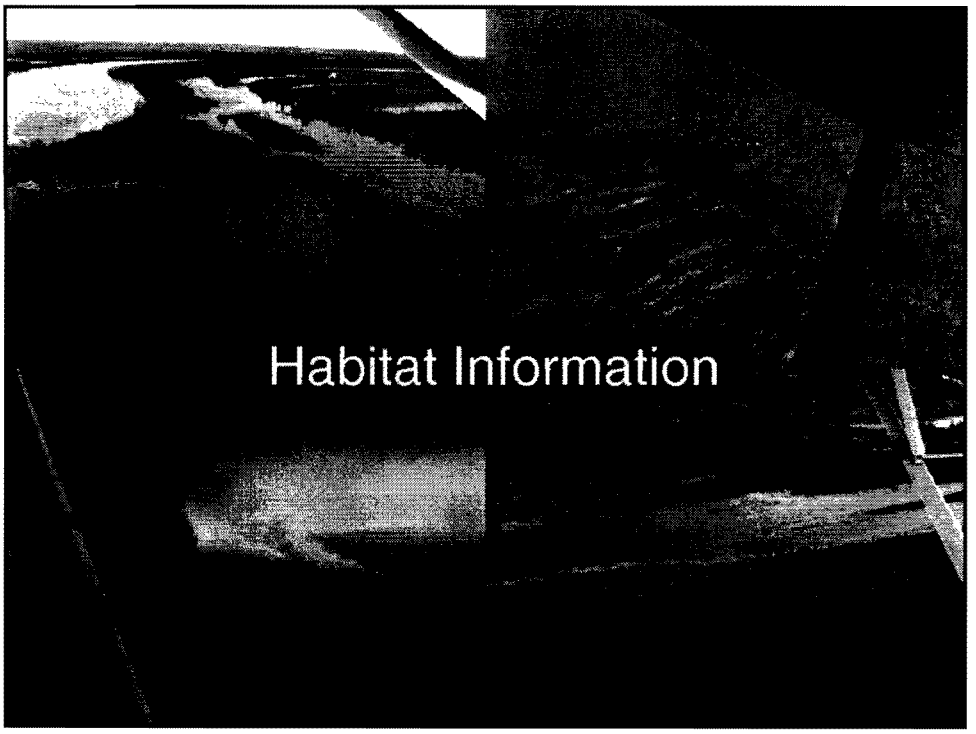

2011 24B Kanuti Wolf Survey Area
Legend
Survey Area
Packs
No Visual
Visual
No Effort/Poor Conditions
Plane Track Logs
24B IM Area
Non Treatment Area
24B IM Buffer 30km
Kanuti NWR
21C

Upper Koyukuk Management Area

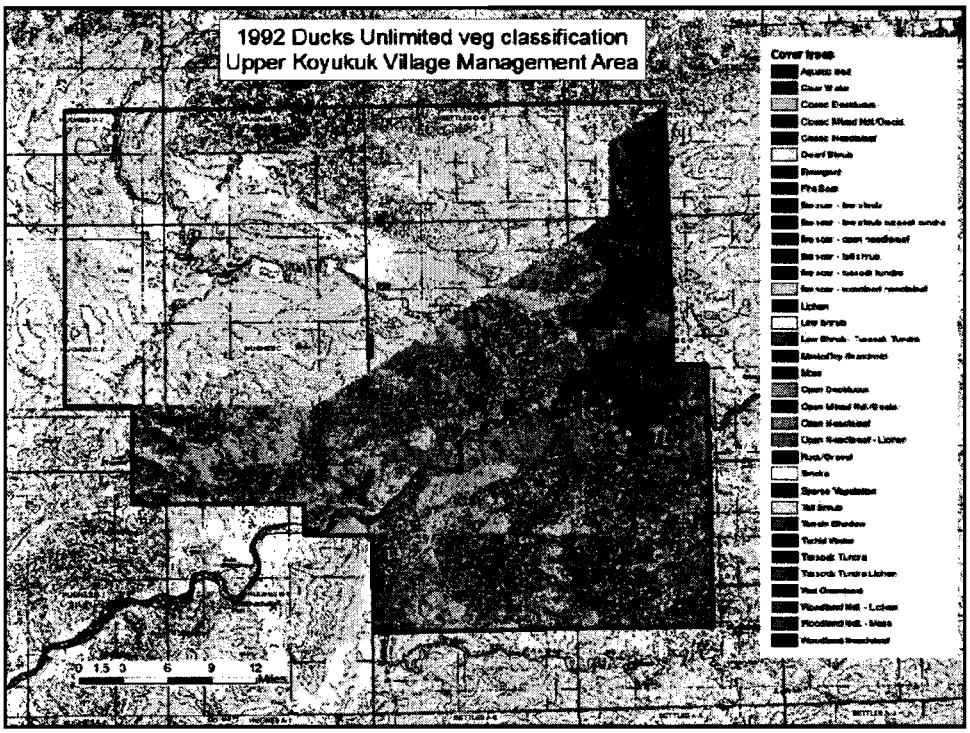
Approximation of averages from 24B survey data

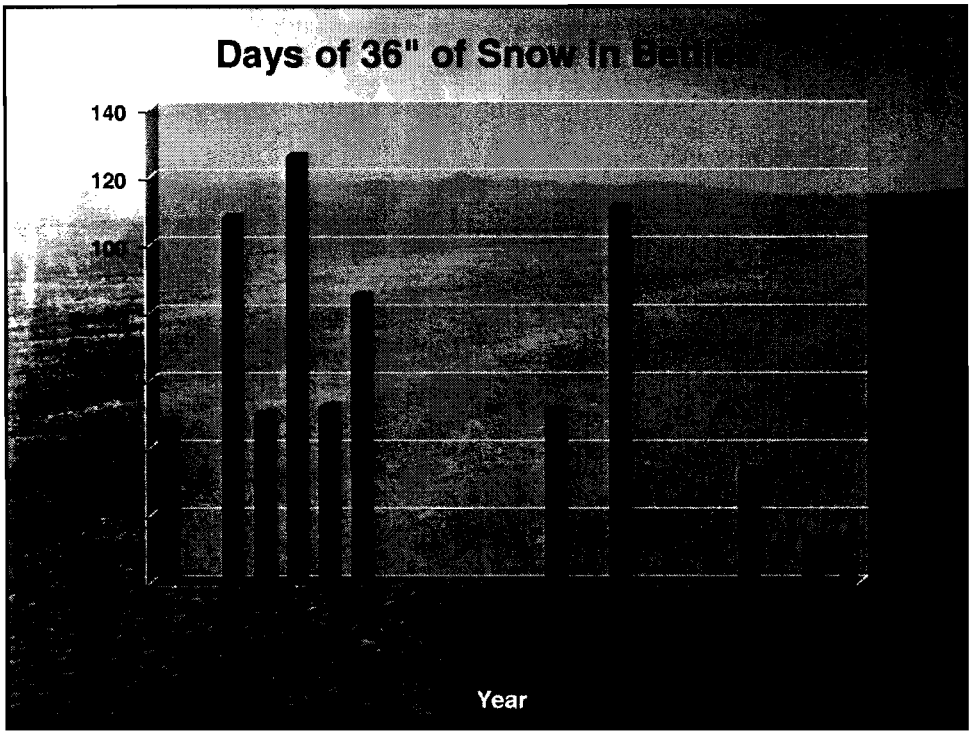
At a twinning rate of ~50% and ~80% calving = 120 calves:100 cows are born in spring.





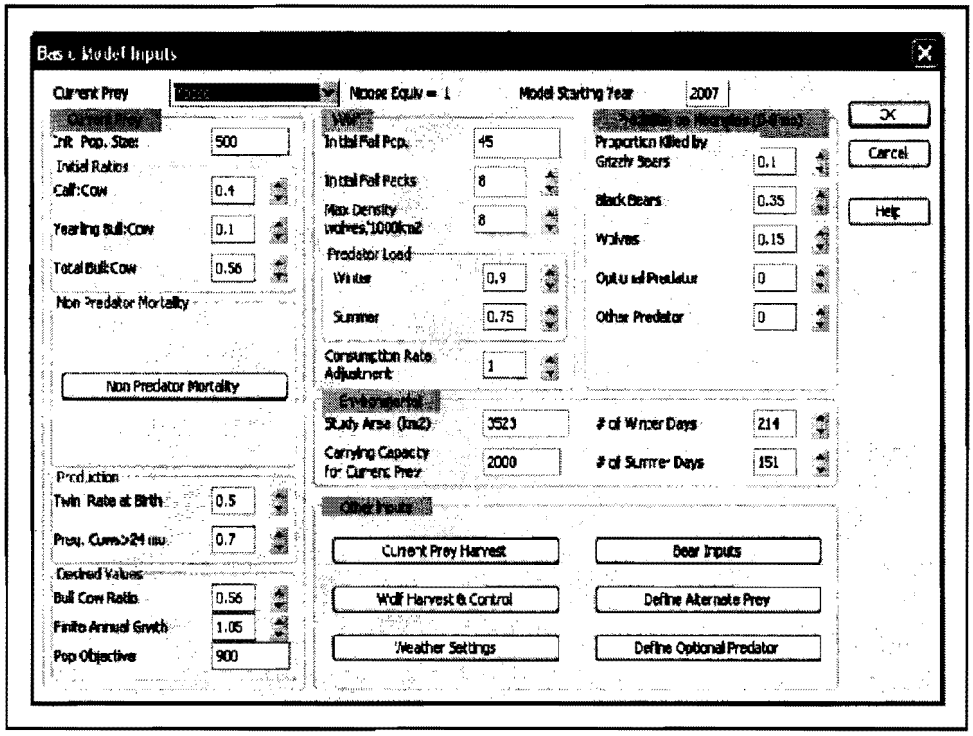

24B Proposed Intensive Management Area
Legend
24B Intensive Management Area
FireAreaHistory
Fire Year
1940 - 1952
1953 - 1963
1964 - 1981
1982 - 1999
2000 - 2010

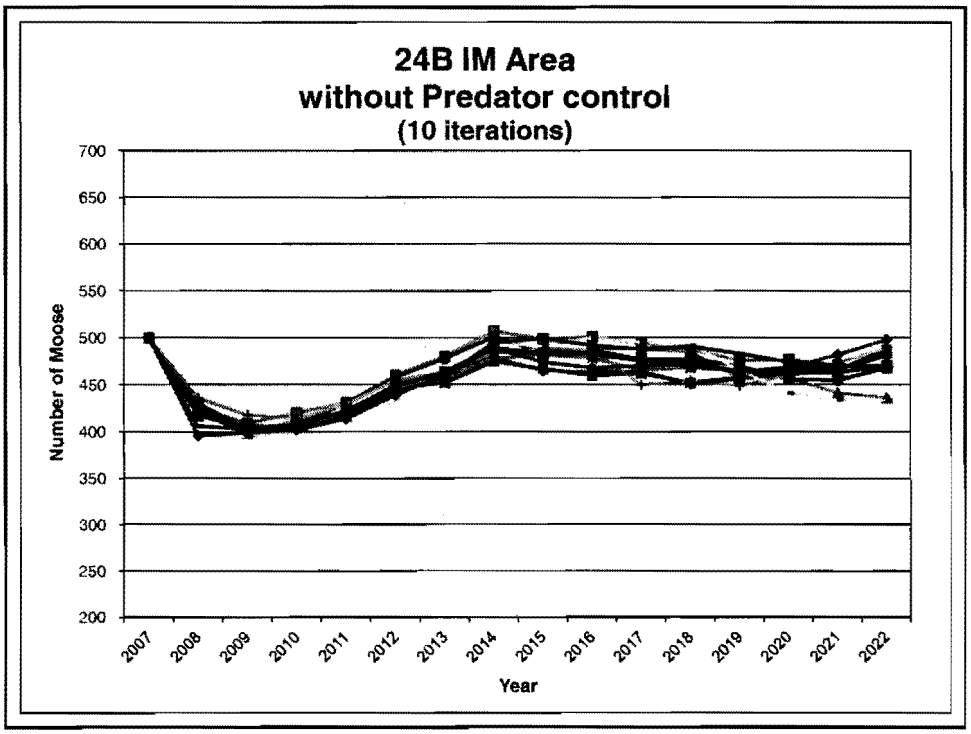

1992 Ducks Unlimited veg classification
Upper Koyukuk Village Management Area
Cover types
0 1.5 3 6 9 12
Miles

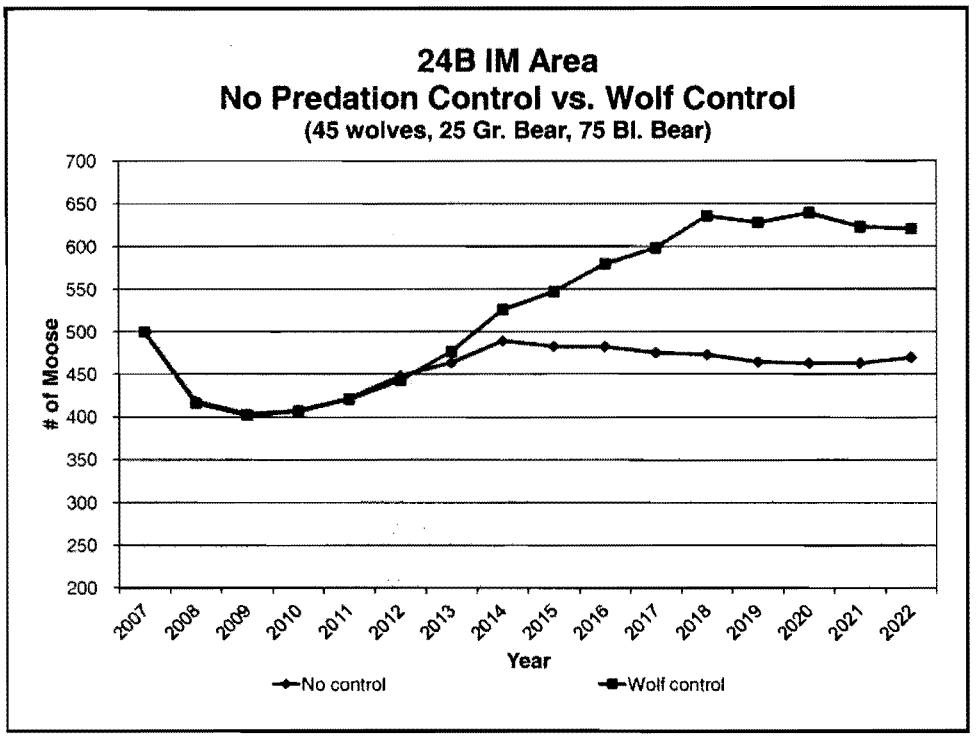


Habitat

- **Browse Assessment (2007)**
  - **Biomass Removal 5.3% (4.3-6.3: 95% C.I.)**
  - **Expanded Removal 8.8% (6.8-10.8: 95% C.I.)**
  - **Brooming Index 0.34 (0.28-0.40: 95% C.I.)**
- **Twinning Rates (24A/B avg. = 48%: Kanuti avg. = 57%)**
  - **2008 – 35%**
  - **2009 – 60%**
  - **2010 – 58%**
  - **2011 – 37%**


Current Prey
Moose
Moose Equiv = 1
Model Starting Year
2007
OK
Cancel
Help
Init Pop. Size
500
Initial Ratios
Calf:Cow
0.4
Yearling Bull:Cow
0.1
Total Bull:Cow
0.56
Non Predator Mortality
Non Predator Mortality
Production
Twin Rate at Birth
0.5
Prey. Cum>24 mo
0.7
Desired Values
Bull Cow Ratio
0.56
Finite Annual Grwth
1.05
Pop Objective
900
Wolf
Initial Pell Pop.
45
Initial Pell Packs
8
Max Density wolves/1000km2
8
Predator Load
Winter
0.9
Summer
0.75
Consumption Rate Adjustment
1
Proportion Killed by
Grizzly Bears
0.1
Black Bears
0.35
Wolves
0.15
Optional Predator
0
Other Predator
0
Environmental
Study Area (km2)
3523
Carrying Capacity for Current Prey
2000
# of Winter Days
214
# of Summer Days
151
Other Inputs
Current Prey Harvest
Bear Inputs
Wolf Harvest & Control
Define Alternate Prey
Weather Settings
Define Optional Predator


24B IM Area
without Predator control
(10 iterations)
Number of Moose
700
650
600
550
500
450
400
350
300
250
200
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
Year



Upper Koyukuk Management Area

	Current Est.	Proposed Obj.
# Moose	405 ± 96	> 650
# Wolves	30 ± 5	5 ± 5
# Black Bears	75 ± ?	75 ± ?
# Grizzly Bears	25 ± ?	25 ± ?
Harvest by Hunters	10-20 moose	40 moose

Operational Plan for UKMA

- Use Helicopters to shoot wolves in fall, following moose surveys, winter "clean-up" as needed
- Wolf carcasses sampled, hides salvaged, disposal will be consistent with cultural values
- Monitor wolf abundance annually during S&I activities, but will only conduct surveys in years 1 & 5
- Establish "experimental control" non-treatment area and collar 30 calf moose in each of the two areas in Oct. of each year (calf and yearling survival rates)
- Monitor survival of radio-collared moose monthly
- Subsistence Division will conduct annual Big Game Household surveys
- Other methods of harvest monitoring (i.e. CPUE)
- Continue S&I activities (moose surveys, wolf surveys, harvest reporting, etc.)

24B Upper Koyukuk Management Area

1) Feasibility Assessment (Mar. 2011)

2) Operational Plan

3) 92.125 IM Predation Control Plan

ADF&G Recommendation: Amend and Adopt

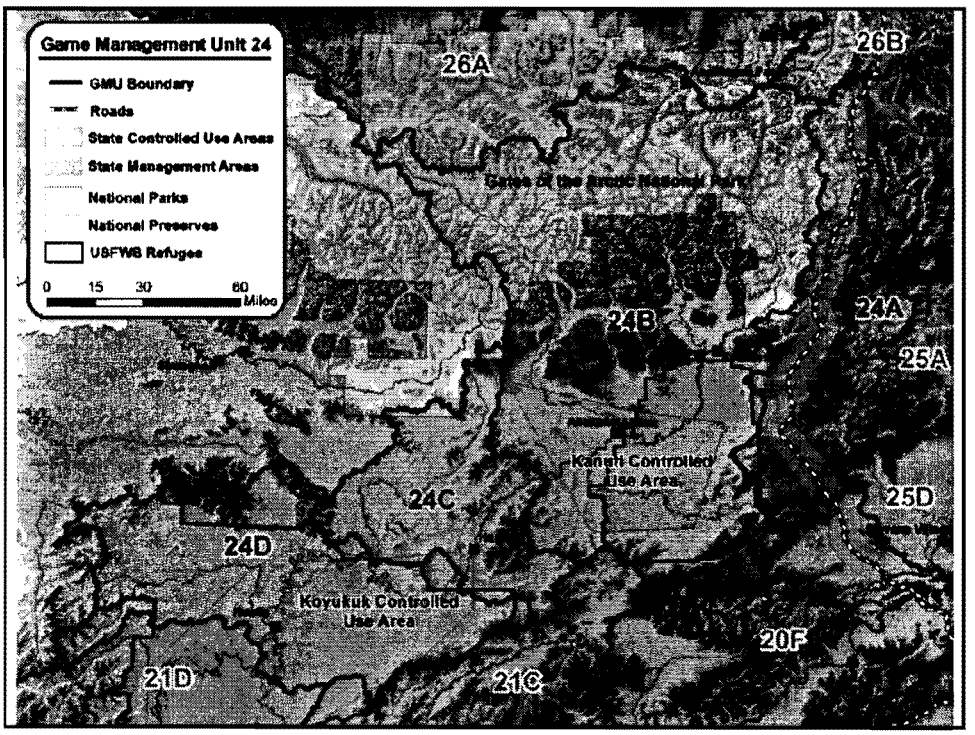
Proposal #164

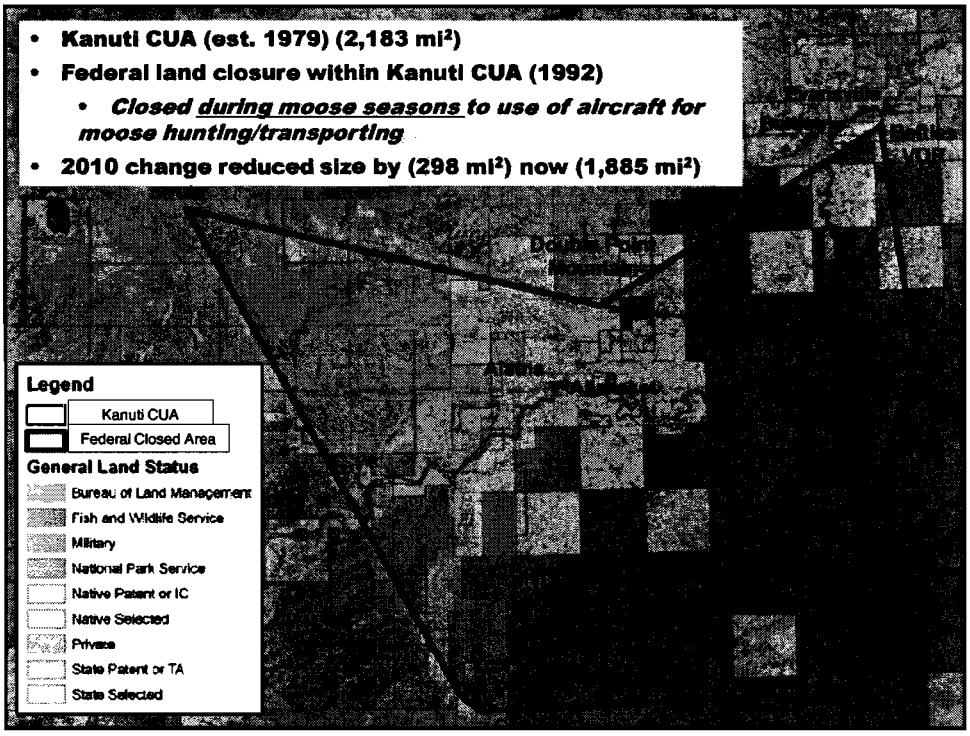
Eliminate Kanuti Controlled Use Area

ADF&G – No Recommendation

RAC – Do Not Adopt MYAC – Do Not Adopt

KRAC – Do Not Adopt



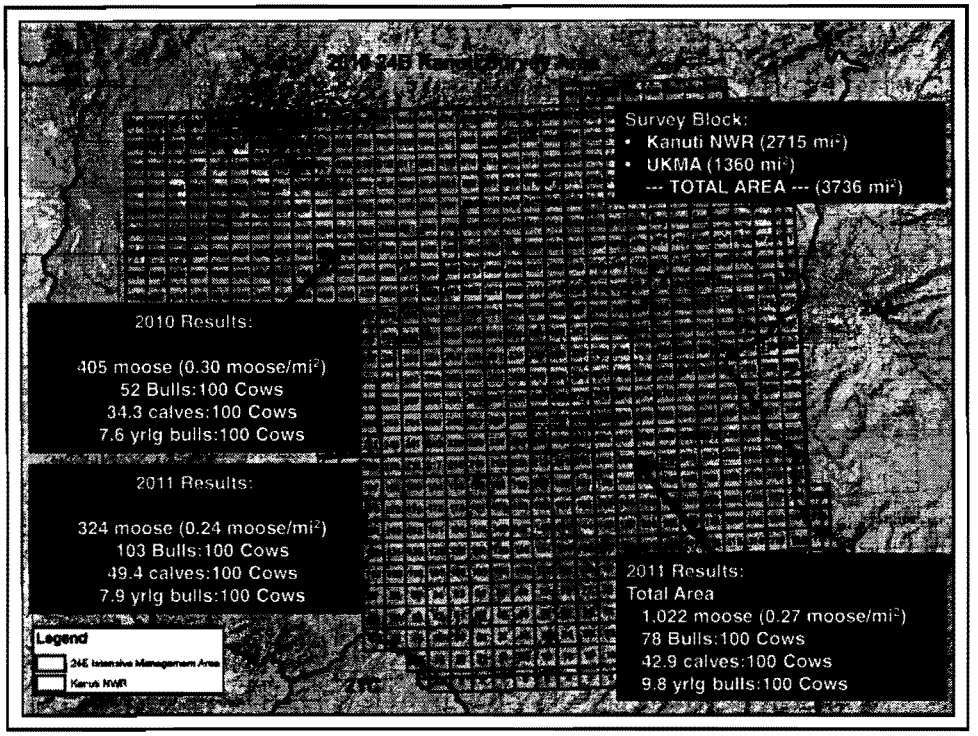


GMU 24 - Harvest Analysis

2010 Estimated Harvest Percentages

Sub-unit	Population estimate[a]	Current Harvest[b]	Harvest Rate
24A	865 ± 250	30	3.5
24B	2,600 ± 800	82	3.2 (1.1 NL)
24C	650 ± 130	44	6.8
24D	4,635 ± 350	140	3.0
Total	8,750 ± 1,570	296	3.4

[a] Observable moose
[b] Includes estimated unreported harvest



Proposal #164

Eliminate Kanuti Controlled Use Area

ADF&G – No Recommendation

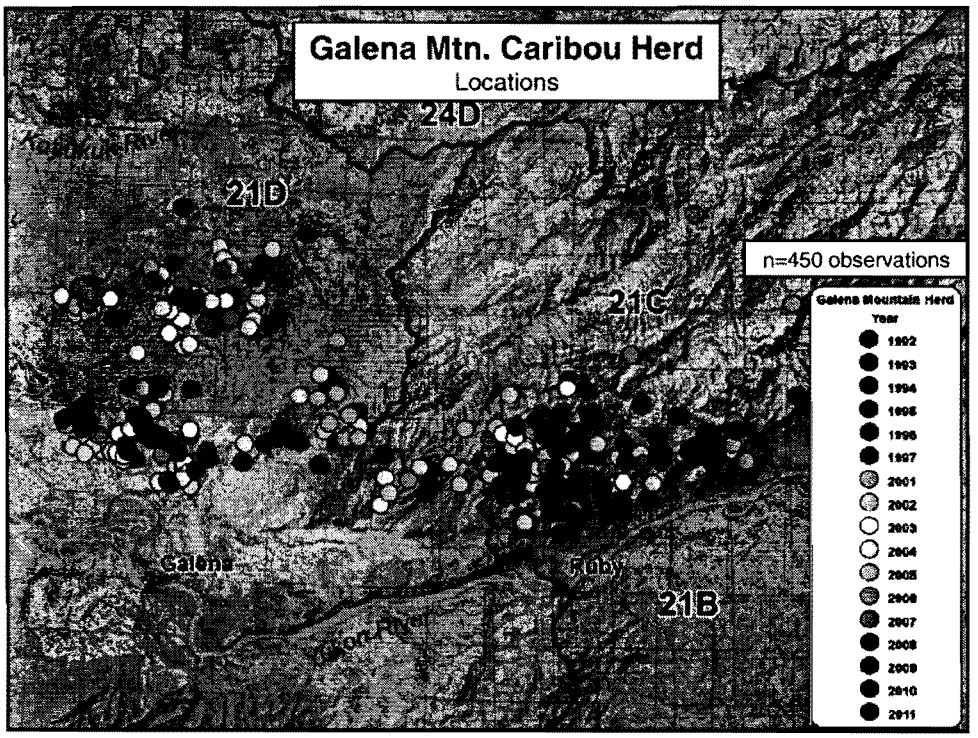
Proposal #165

Close Galena Mtn. Caribou Seasons in Unit 24

ADF&G – Do Not Adopt

RAC – Do Not Adopt MYAC – Do Not Adopt

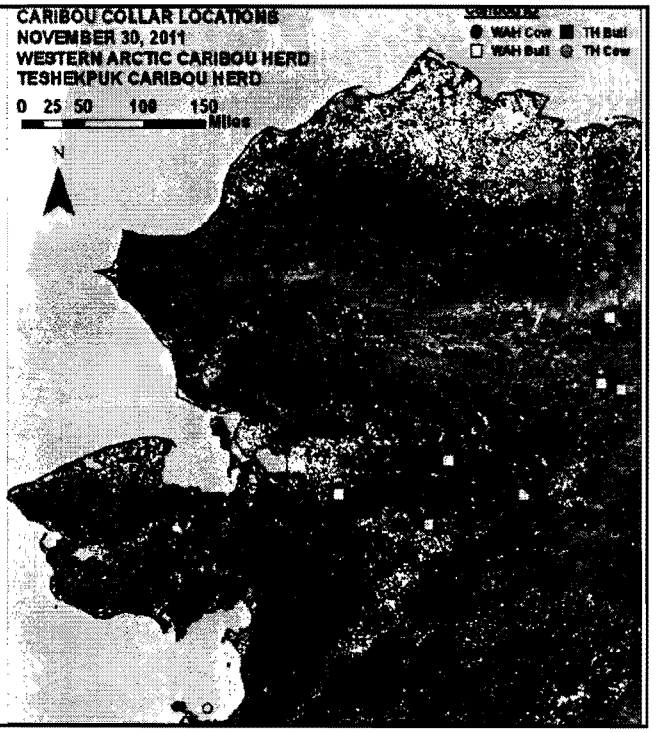
KRAC – Do Not Adopt

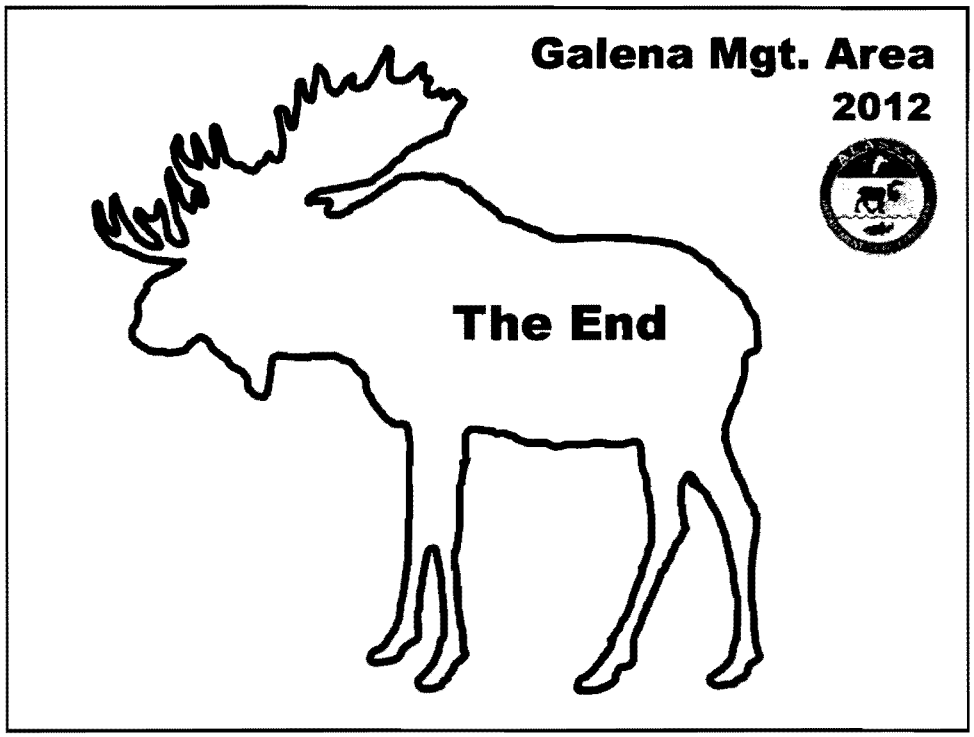


CONCLUSION:

1) GMH do not occur in Unit 24
2) Hunting is already closed for the GMH range.
3) Closure in Unit 24 would eliminate WAH hunting opportunity

ADFG – Do Not Adopt




Galena Mgt. Area
2012
The End

RC 41

Randall R. Rogers
PO Box 82215
Fairbanks, AK 99708-2215
(907) 479-8207
rrrogers@alaska.net

February 29, 2012

Representative Alan Dick and members of the
House Resources committee
Sent via the Fairbanks Legislative Information Office

Re: House Joint Resolution No. 32

Dear Representative Dick and members of the House Resources Committee:

I appreciate the concerns of the members of the House Resources Committee about the potential restrictions on resource development and land use related to wood bison reintroduction in Alaska. I also appreciate that the current version of HJR 32 does not outright oppose wood bison reintroduction but gives support for congressional action to remove wood bison from the Endangered Species Act (ESA). While I do not personally object to this approach to resolving concerns about the status of wood bison under the ESA, I am concerned that there could be many political and legal challenges to overcome in order to achieve a congressional exemption of wood bison from the ESA. This approach could result in an extended delay or make the wood bison reintroduction project impossible.

I believe that completing regulations under section 10(j) of the ESA to designate wood bison I Alaska as a Nonessential Experimental Population (NEP) is a legally sound approach to resolving concerns about wood bison and maintaining opportunities for resource development and other land uses, including future hunting. I urge you to modify HJR 32 to include the option of completing the ESA 10(j) regulations.

Please keep in mind that proposed regulations would be issued first and there would be a minimum 60-day public comment period where the legislature and others could review the proposed regulations to see exactly what the provisions are. Wood bison cannot be released to the wild until the regulations are complete. Since the captive herd of wood bison at the Alaska Wildlife Conservation Center is owned and controlled by the State of Alaska the decisions on adequacy of the 10(j) regulations and moving forward with releasing the bison to the wild will be made by the State.

There are several clauses in the current version of HJR 32 that are inaccurate or outdated. The U.S. Fish and Wildlife Service (USFWS) has resolved some of the issues surrounding hunting of wolves in the Northern Rocky mountains and is ready to move forward with 10(j) regulations for wood bison in Alaska that provide for future hunting. The decision that hunting can be a valid and important tool to help promote wood bison conservation has been reviewed and approved all the way up to the national director level of the USFWS. Further, should litigation on the 10(j) rule occur, the USFWS is confident that the regulation will be upheld and it could help establish good case law that would further reaffirm hunting as a conservation tool. The state and USFWS need to work together and agree on suitable language on future hunting in the draft 10(j) rule so the USFWS can prepare a proposed rule to be published in the Federal Register. The legislature should encourage the Parnell administration to move forward quickly with this effort.

With the 10(j) and accompanying section 4(d) rules the scenario of locking up the Donlin Creek Mine included in HJR 32 would never occur. The 4(d) rules contain provisions to allow hazing of wood bison away from development activities. They also include provisions to allow "incidental take," which could include wood bison mortality, if the take occurred during an otherwise lawful activity. Further the draft ESA rules contain a provision that if the regulations are overturned in court or invalidated for any reason, the State would maintain the authority to remove wood bison from the landscape.

Unfortunately, since the draft regulations have never been published and made available for public review and comment members of the legislature and others who have and interest in wood bison restoration and resource development do not know exactly what the regulations will accomplish. This rule making process needs to move forward, perhaps concurrently with efforts to achieve congressional action, so that all viable options are being pursued to satisfy concerns about wood bison and the ESA and the State can move forward with releasing wood bison to the wild.

Background and Further Information

I am very familiar with the Alaska wood bison reintroduction project and efforts to address the status of wood bison under the Endangered Species Act (ESA) through my former position as Wildlife Planner for the Alaska Department of Fish and Game, Division of Wildlife Conservation in Fairbanks. I participated in years of discussions on wood bison and the ESA with staff from the USFWS and the Alaska Department's of Law and Natural Resources. Since my retirement last summer I have kept in contact with state staff working on the matter and recently met with key staff in the USFWS Alaska Regional Office.

The Alaska Department of Fish and Game has been working to restore wood bison in Interior Alaska for nearly twenty years. Wood bison restoration is a renewable form of resource development that will provide benefits to people for many, many years to come. Wood bison will provide a source of healthy red meat for Alaskans who depend on fish and wildlife. There will be opportunities for economic development based on bison viewing and hunting.

In 2008 ADF&G imported a small herd of wood bison from Canada. These bison and their offspring are receiving quality care at the Alaska Wildlife Conservation Center in Portage and will be used as founding stock for returning wood bison to the wild in Alaska.

While the wood bison are here there are concerns that because wood bison are an endangered species, reintroducing them could result in restrictions on oil and gas or other natural resource development. To address those concerns, ADF&G has been working with the Alaska Department of Law and the U.S. Fish and Wildlife Service to develop regulations to designate wood bison in Alaska as a "Nonessential Experimental Population" under section 10(j) of the Endangered Species Act. This type of regulation has never been applied in Alaska and would cause wood bison to be treated differently than any other endangered species in our state. The regulations will remove virtually all the regulatory requirements that normally apply under the ESA and designate the State to have primary management authority over wood bison herds. The regulations will prohibit designation of critical habitat for wood bison, a designation that is one of the primary concerns about possible restrictions on resource development where endangered species are present.

Congress added section 10(j) to the ESA specifically to address concerns about possible restrictions on land use where species are reintroduced into portions of their historic range where they are no longer present. The Department of Law concluded that wood bison restoration in Alaska fits perfectly with this provision of the ESA. Further, their research has shown that of the nearly 30 times this provision of the ESA has been used for other species in other states, none of the regulations have ever been overturned in the courts.

In the last year the ESA regulations have been delayed due to concerns about provisions regarding future wood bison harvest. Most recently the USFWS has indicated that provisions for future state-managed harvest can be included in the proposed regulations. The State and USFWS need to agree on language on future hunting to include in the proposed regulations so there is no further delay in the regulatory process.

To further respond to concerns about possible restrictions on resource development ADF&G changed the initial release site from the Yuko Flats or Minto Flats where Doyon, Ltd. is exploring for oil and gas to the lower Yukon-Innoko River area. There is little potential for conflicts with other resource development in this area and local residents have strongly supported the proposal. If wood bison roamed to the proposed Donlin Creek Mine the special ESA regulations would allow them to be hazed away or removed if necessary. If a legal challenge were to occur both state and federal attorneys have indicated they are confident the regulations would be upheld in court.

Designating wood bison as a Nonessential Experimental Population is a legally sound way to proceed with wood bison restoration while protecting other resource development activities. Publishing the ESA regulations will allow people and organizations interested in the wood bison project an opportunity to review what is being proposed and provide comments on how the final regulations can be revised and improved.

It is very expensive to care for the wood bison herd in captivity and the opportunity to restore wood bison in Alaska cannot be maintained indefinitely. Like a natural gas pipeline the project must be completed when all the factors line up correctly.

The Parnell administration and legislature need to support the efforts to establish special regulations for wood bison under the ESA. Once the regulations are completed they need to support ADF&G's efforts to implement the project as expeditiously as possible while the opportunity is present.

Conclusions

I urge members of the House Resources Committee and the Alaska Legislature as a whole to keep in mind the benefits that wood bison restoration can bring to residents and visitors to our state and support the Alaska wood bison restoration project. If Alaskans work together with a "can-do" attitude, there is no reason that wood bison restoration cannot proceed in harmony with other resource development.

Sincerely,

Randy R. Rogers

Randy R. Rogers

HOUSE JOINT RESOLUTION NO. 32

IN THE LEGISLATURE OF THE STATE OF ALASKA

TWENTY-SEVENTH LEGISLATURE - SECOND SESSION

BY REPRESENTATIVES DICK, Austerman

Introduced: 2/1/12
Referred: Resources

A RESOLUTION

1 **Urging the United States Congress to remove wood bison from protection under the**
2 **Endangered Species Act of 1973 and to grant control of wood bison in Alaska to the**
3 **state.**

4 **BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:**

5 **WHEREAS** the purpose of 16 U.S.C. 1531 - 1544 (Endangered Species Act of 1973)
6 is to protect or restore a species to a condition where continued existence of the species is not
7 threatened or endangered; and
8 **WHEREAS** litigation pursued by numerous environmental and conservation groups
9 has significantly affected the Endangered Species Act of 1973, and, often, implementation of
10 the current law serves to defeat the original purpose of the Act; and
11 **WHEREAS** wood bison no longer exist in the United States but still exist in Canada;
12 and
13 **WHEREAS** the Department of Fish and Game would like to reintroduce wood bison
14 in the state; and
15 **WHEREAS** wood bison are an endangered species and cannot be hunted without

federal exemptions; and

WHEREAS, if wood bison were reintroduced in the state, resource development on the land they occupy would be significantly affected; and

WHEREAS, in an effort to avoid the restrictions on hunting and resource development, the Department of Fish and Game negotiated with the United States Fish and Wildlife Service exemptions under 16 U.S.C. 1533(d) and 1539(j) (Endangered Species Act of 1973) to allow hunting of wood bison and to allow resource development on land used by wood bison; and

WHEREAS, just before the negotiated exemptions were to be signed and the wood bison reintroduced into the wild, the United States Fish and Wildlife Service informed the Department of Fish and Game that new litigation had been filed challenging whether endangered species can ever be hunted and that the United States Fish and Wildlife Service is no longer willing to proceed with the negotiated exemptions, as agreed; and

WHEREAS, because hunting wood bison, one of the main purposes for reintroducing wood bison in the state, could be prohibited and other negotiated provisions are likely to be challenged, the Department of Fish and Game is unwilling to release the wood bison; and

WHEREAS, after 20 years of protecting the gray wolf in other states, during which time, all of the original goals were met or exceeded, the United States Fish and Wildlife Service would not remove the gray wolf from the endangered species list and return control to the states; and

WHEREAS, because numerous lawsuits have been filed in attempts to use the Endangered Species Act for purposes other than to accomplish the stated goal, repeated requests were made to the United States Congress to intervene; and

WHEREAS, in an unprecedented act, the United States Congress recently removed the gray wolf from protection under the Endangered Species Act and returned control to the respective states; and

WHEREAS, under the current situation, if wood bison were released in the state, their habitat and any areas onto which they were to wander could become subject to the restrictive provisions of the Endangered Species Act of 1973; and

WHEREAS significant resources in the state are at stake; and

WHEREAS the Donlin Creek mine is located well within wood bison traveling

1 distance, and, if wood bison were to wander to Donlin Creek, that $70,000,000,000 of
2 resources could easily be locked up, at a cost of $700,000,000 for each of the approximately
3 100 wood bison released; and

4 **WHEREAS** Canada, under the Species at Risk Act, has declared the wood bison
5 proposed to be sent to Alaska a surplus and has acknowledged that the loss of those wood
6 bison would not have a negative effect on the successful restoration of wood bison in Canada;
7 and

8 **WHEREAS** the Department of Fish and Game has successfully managed plains
9 bison, which are genetically similar to wood bison, and wood bison would prosper under
10 similar management; and

11 **WHEREAS**, if the wood bison proposed to be reintroduced to the state are to be
12 under the protection of the Endangered Species Act of 1973 and its accompanying restrictions
13 relating to land development and hunting, the Department of Fish and Game has stated that it
14 will not accept them; and

15 **WHEREAS** these facts serve to demonstrate that the wood bison's status on the list of
16 species protected under the Endangered Species Act of 1973 is what most endangers them;

17 **BE IT RESOLVED** that the Alaska State Legislature urges the United States
18 Congress to remove wood bison from protection under the Endangered Species Act of 1973
19 and to grant control of wood bison in Alaska to the state.

20 **COPIES** of this resolution shall be sent to the Honorable Barack Obama, President of
21 the United States; the Honorable Joseph R. Biden, Jr., Vice-President of the United States and
22 President of the U.S. Senate; the Honorable Harry Reid, Majority Leader of the U.S. Senate;
23 the Honorable Mitch McConnell, Minority Leader of the U.S. Senate; the Honorable John
24 Boehner, Speaker of the U.S. House of Representatives; the Honorable Nancy Pelosi,
25 Minority Leader of the U.S. House of Representatives; the Honorable Ken Salazar, United
26 States Secretary of the Interior; and the Honorable Lisa Murkowski and the Honorable Mark
27 Begich, U.S. Senators, and the Honorable Don Young, U.S. Representative, members of the
28 Alaska delegation in Congress.

HOUSE BILL NO. 186

IN THE LEGISLATURE OF THE STATE OF ALASKA

TWENTY-SEVENTH LEGISLATURE - FIRST SESSION

BY REPRESENTATIVES DICK, Feige

Introduced: 3/10/11
Referred: Resources

A BILL

FOR AN ACT ENTITLED

"An Act relating to the authority of the commissioner of fish and game with regard to the importation or relocation of wood bison in the state."

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:

*** Section 1.** AS 16.05 is amended by adding a new section to read:

Sec. 16.05.054. Limitation on authority of commissioner in relation to wood bison. The commissioner may not import wood bison into the state or relocate wood bison to a new area of the state without prior legislative approval. Before giving approval under this section, the legislature may take into consideration other statutes and regulations related to bison in other areas of the state, the management plans for those bison, and the mitigation of property damage caused by those bison.

To: Game Board Members

From: Phil Nuechterlein
18920 Elnora
Eagle River, AK 99577
Phone 907-694-4136
email: knik07@gmail.com

Date: March 2, 2012

RE: Public comments relating to **proposal 102a LLAMAS RESTRICTED** for big game hunting

Dear Game Board Members,

1) **APPRECIATE NO BAN ON LLAMAS BUT WHY TEST?** I think that most llama owners appreciate that the board changed Proposal 102 (as initially recommended for adoption by the Alaska Department of Fish and Game) to 102a so that it gave llama packers an opportunity to still use our llamas for big game hunting if tested. 102a as approved by the board, allowed for llama testing as opposed to an outright ban on llamas (as proposed in 102 and recommended for adoption by ADF&G).

   I am passionate about hunting big game using llamas and my wife and I have done so for nearly 29 years. This regulation caught me by complete surprise. I was out of State when the board met on this. I really wish that I could have testified before the board on this issue.

   I still have some concerns with the testing issue since it seems unnecessary. I am told by a local veterinarian that testing our llamas could be very expensive, complicated, and that erroneous results will likely occur. It will undoubtedly cast a "stigma" on llamas that will encourage other agencies to adopt unnecessary restrictions or bans (i.e. State Parks), and meeting these testing requirements will be a considerable expense and hassle for llama owners. The "stigma" was cast in the 90's when Canyonlands National Park unsuccessfully tried to ban llamas on the premise that they could pass infectious disease to wild game populations. Alaska State Parks, seeing this, proposed a ban of their own. The proposed Alaska State Parks ban was also successfully curtailed when the science was presented.

   Why should disease testing be required for Alaskan hunters using llamas when no other states or federal jurisdictions ban llamas or require testing for llamas? Yellowstone is OK with llamas. Glacier is OK with llamas. The western states with wild sheep and wild goat populations are OK will llamas. They have studied and studied this issue and have deemed the risk of disease transmission from llamas to be insignificant, so why impose a testing restriction on Alaskan hunters at all?

2) **RISK OF LLAMAS TRANSMITTING DISEASE TO ALASKA'S WILD GAME .** A policy of zero risk tolerance is not sustainable in today's society and it is not a goal that can be practically followed by those charged with managing Alaska's wildlife and our environmental heritage. Since the risk of llamas transmitting disease to Alaska's wild game populations is near zero, in order to sustain a pack llama restriction based on a perceived threat of disease transmission, Alaska's regulators would effectively have to adopt a zero-risk tolerance policy. The folly of such a policy, is its attendant surrealistic view of costs and benefits and its resultant degradation in public confidence in administrative decision-making. For any hunting regulation to restrict pack animals and be meaningful as a measure to safeguard our wild game populations against domestic animal diseases, an overall risk based strategy should have been undertaken by the State of Alaska to include ADF&G, ADNR, etc. When people say that we cannot afford to take ANY risk of disease transmission to our wild game, they may not be considering the fact that we are already taking risk by allowing horses, dogs, and humans in wild game habitat, as examples. It is a fact that horses, dogs, and humans are capable of transmitting disease to wild game populations. It may be a very small risk, but it is a risk that is generally accepted. Another example is that risks occur when 4-wheelers are used because they can carry feces on their tires and fenders from infected farms and spread pathogens into game habitat. Again, the risk is small and generally accepted or not recognized. An effective disease control program must be based on a legitimate risk analysis. Under 102a, hunters are the only group affected. Hikers, backpackers, berry pickers, etc. will continued to use their pack animals in wild game country. Hunters will continue to use their pack animals to scout game territory before the season opens. The Alaska Dept. of Natural Resources Div. of Mining, Land, and Water allows domestic animals (sheep, goats, cattle, etc.) to graze on state land (yes, even in wild sheep habitat) either through grazing leases, through land use permits, *or without restriction if 5 or less animals are grazed*. Source: http://dnr.alaska.gov/mlw/factsht/gen_allow_use.pdf See "Generally Allowed Uses on State Land" on 2nd page where it says "Grazing no more than five domestic animals". Examples of a high risk grazing environments are Lazy Mountain in Palmer where state lands are classified to allow grazing. I was told by a veterinarian that they know of domestic sheep on state land in Alaska that are grazing in wild sheep habitat and that herd is carrying an infectious disease that could infect the dall sheep. Wildlife managers in other states with wild sheep populations know that the risk of disease transmission is exponentially higher when domestic animals graze in wild sheep habitat. These wildlife managers also know that the risk of disease transmission by a few hunters that pack in sheep habitat for a few days or weeks out of the year is extremely low by comparison. Furthermore, hunters typically use healthy animals because sick or weak animals simply will not perform.

3) **THE TESTS REQUIRED IN 102A** – with regard to the diseases that 102a will require llamas to be tested for, there are no identified pathogens that are specifically adapted to llamas as a host species. That is to say, that if you scour the veterinary literature, you will find reports of llamas that have contracted viral and bacterial problems from horses, cattle, sheep and

goats. But there are no reported incidences of diseases contracted by these other species specifically from contact with llamas. This may not be surprising given that llamas are not standard ruminants. While they possess a forestomach for fermentation of vegetative foodstuffs, they have evolved separate from the common hoof stock ruminants, which include our domestic and wild ruminant species in North America. Source: http://www.llama.org/johnes/kofa0.htm

a) Johnes disease - Even ADF&G's staff veterinarian, Dr. Beckman said that it is rare in llamas. Dr. Beckman said she is not as concerned about the use of llamas, as they are a different animal group, more closely related to camels, and have far less potential to transmit diseases to wild sheep and musk ox than goats. Dr. Beckman said "If you're going to use a pack animal use a horse. Maybe a llama as the next choice, but never a goat." Source:
http://www.adfg.alaska.gov/index.cfm?adfg=wildlifenews.error&CFID=12139395&CFTOKEN=23802181&jsessionid=830BB73E0F910BE9525D4618B6B33D68
Why test llamas for Johnes disease since Yellowstone NP, Glacier NP, and our western lower 48 states do not ban llamas or require llama testing for Johnes disease?

b) Lungworms – Not only is the risk of llamas passing lungworms to wild animals infinitesimally small, lungworms are already well documented to be present in Alaska's wild game populations, including dall sheep, per ADF&G's website. Source: http://www.adfg.alaska.gov/index.cfm?adfg=disease.internal5
Also, according to the book , "The Wolves of Mount McKinley" by Adolph Murie, lungworms were first documented in 1939 in dall Sheep populations near Denali. Source:
http://books.google.com/books?id=_jrDrKS4o-IC&pg=PA84&lpg=PA84&dq=lungworm+dall+sheep&source=bl&ots=DYtEppOxiZ&sig=WoSbPCGkGt8leq1evCmuUjFtbRY&hl=en&sa=X&ei=6_5PT66CEYGWiQKIx7S0Bg&ved=0CE0Q6AEwBQ#v=onepage&q=lungworm%20dall%20sheep&f=false

c) Pasteurellae bacteria – Again, there are no identified pathogens that are specifically adapted to llamas as a host species. There are no reported incidences of diseases contracted by horses, cattle, sheep and goats specifically from contact with llamas so the risk of llamas passing this disease to wild game populations is extremely small. Sources: http://www.llama.org/johnes/kofa0.htm
http://www.napga.org/links.asp?PageID=3&LinkID=229&menuID

4) WHY ARE THE "SCIENCE" AND "RISK ASSESSMENTS" USED BY ADF&G TO SUPPORT A BAN/RESTRICTION ON LLAMAS QUESTIONABLE?

If the research used by ADF&G to justify their position on prohibiting or restricting llamas is legitimate science, then why aren't the other state or federal agencies using that same science to implement a similar ban/restriction on llamas?

I think that I can explain why. The two Canadian studies that ADF&G cite to defend their position on banning/restricting llamas are based on anecdotal evidence and theoretical possibilities.

In the 1st Canadian study entitled "*Communicable Disease Risks to Wildlife from Camelids in British Columbia*" (Source: http://www.env.gov.bc.ca/wld/documents/wldhealth/camelid_risk03.pdf)
Dr. Helen Schwantje, found no evidence that llamas posed any more risk than horses/dogs/humans and she even admitted this in her report. In spite of her findings she insisted on classing llamas as "high risk" to thinhorn sheep populations because they were exotic animals and not enough is known about them. Quote from this BC study: "Risks from camelids to wildlife in British Columbia remain hypothetical after this risk assessment, as no direct evidence was found to implicate camelids as sources of significant diseases in wildlife in BC or elsewhere." (underline added). So ADF&G is relying on so called "risk assessments" from Canadian studies that draw "hypothetical" conclusions?

In the 2nd Canadian study entitled "*Examining the Risk of Disease Transmission between Wild Dall's Sheep and Mountain Goats, and Introduced Domestic Sheep, Goats, and Llamas in the Northwest Territories*" (Source: Google the title as the URL is too long to print here) on page 2 it states, "Conversely, contact between llamas and wild Dall's sheep or goats **may** result in disease in wild species, but there is insufficient data available to clearly assess the role of camelids as a source of disease at this time (for additional information see "Communicable Diseases Risks to Wildlife from Camelids in British Columbia)." (underline added) Again, the 2nd Canadian study finds no evidence that llamas posed any more risk than horses/dogs/humans do to wild sheep populations. This study is only speculative with respect to the possibility of llamas transferring disease to wild dall sheep and goats. This 2nd study refers to the BC study for additional hypothetical information.

So the authors of these Canadian studies and ADF&G expect all of us to believe that this is credible science and a legitimate risk assessment with respect to a llama's potential to spread disease to wild game?

5) **IN CLOSING** - I recommend utmost caution when considering Canadian regulations or studies as the basis for our regulations. For example, I recently drove across the border into Canada and the Canadian customs agent asked me if I had any brass knuckles. It seems that Canadian Customs agents are using our TSA guidebook and now Alaska is using Canadian

studies authored by "veterinary experts" that contain hypothetical risk assessments. The terms "wildlife biologist" or "veterinarian" do not automatically assume a tie to science or the pursuit of truth. There are "experts" that have bias. The "experts" might be sympathetic to the equine lobby or they might perceive llamas as "exotics that don't fit Alaskan landscape." They might be politically motivated rather than scientifically driven or they might be making recommendations in the interest of management expedience. I hope that you see a problem with 102 and 102a. I hope you see that there has been no legitimate risk analysis pertaining to the adoption of 102 or 102a. I believe that the true science and facts are on the llama's side.

I ask the board to reconsider 102a as you did not have the above information that I am presenting you with. Also, the board did not have the information from Dan Marshall's petition dated 2/9/12 and the attachments to his petition. The true scientific evidence overwhelmingly shows that llamas used as pack animals for hunting do not pose a significant threat to Alaska's wildlife. I ask the board to revise 102a to exclude camelidae (lamas).

Sincerely,

Phil Nuechterlein

March 1st - 2012

RC 43

Audun Endestad
PO Box 81591
Fairbanks, AK 99708

Proposal 89: Opposition: We have enough draw areas. We need some open areas so hunters can focus on hunting sheep instead of waiting for years to be drawn.

Proposal 91: Opposition: If you are a non resident you need to fit into the non resident pool for drawing; otherwise you will take away the number of resident draw permits available.

Proposal 207: Opposition: This area has seen a lot of traffic in the past 10 years; it needs a rest period. It is too easy for motorized vehicles to get around in the high country during this hunt. A lot of pressure is put upon the moose during this critical time of year as a result.

Proposal 214: Opposition: I don't see a need for this. Harvesting any ram to pick off odd looking rams might seem like a good idea, but I am afraid that the permit holder will not find these rams and instead take a young healthy ram. If the odd looking ram is old enough to be legal, it can be taken during the regular open season.

Proposal 236: Opposition: Before considering taking this step try other measures; like lengthening the grizzly bear season in 20A and 20B.

EP 32

RC44

Alaska Board of Game Meeting – Interior Region

Wedgewood Resort – March 2-11, 2012

Bulletin Points

Proposal 46 5 AAC 92.200. Purchase and sale of game. By Fairbanks Advisory Committee. Allow the sale of big game trophies.

- We oppose Proposal 46 to allow the sale of big game trophies
- It is not customary and traditional to sell nonedible parts of caribou and moose or other wild game
- Allowing the sale of trophies will encourage public abuse of harvesting large game just to sell trophies for a profit
- If the Board passes this proposal, a permitting process should be in place to track sales of trophies
- Selling of trophies without a permitting process in place will make it difficult for Wildlife Troopers to track illegal activities
- Intensive Management Areas were determined to be "ungulate population that is important for high levels of human consumptive use"
- Selling trophies that were harvested from IM Areas should not be allowed
- If a permitting process were in place, it could track caribou and moose harvested from Intensive Management Areas as well as the sale of trophies

Proposal 151 5 AAC 92.540. Controlled Use areas. By Fairbanks Advisory Committee. Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meet the original intent.

- We oppose Proposal 151
- We oppose changes to Wood River CUA and Yanert CUA areas. Changes to the Wood River CUA and Yanert CUA will only create more trespass on private lands
- Ahtna Inc. own lands near Wood River CUA and Yanert CUA. Trespass occurs on AI lands

By Ahtna Ten Nene C&T Committee

- Delta Controlled Use Area in Unit 20A does not need to be changed at this time either
- All of the Unit 20 CUAs are meeting objectives, changing them will negatively affect subsistence uses
- Conflicts among user groups will continue to occur, impact to resources will continue, even if the Board of Game were to make changes to CUAs

Proposal 186 5 AAC 85. 045. Hunting seasons and bag limits for moose. By Upper Tanana Fortymile and Slana Fish and Game Advisory Committee. Modify moose season in portion of Unit 12 and Unit 11.

- We support Proposal 186 with the understanding that this will not affect the community hunt
- The community hunt is an important hunt for the Ahtna People

Proposal 206 5 AAC 85.045(a) (18) Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Reauthorize the antlerless moose hunting season in Unit 20A.

- We oppose Proposal 20 to reauthorize an antlerless moose hunting season in Unit 20A
- Allowing an antlerless hunting season will crash the cow moose population
- In Unit 13, a cow moose hunt was allowed in the 70s, which jeopardized moose population, it took years to recover
- Hunters may un-intentionally kill a cow moose with a calf
- Allowing an antlerless moose hunt will eventually decrease the moose population in Unit 20
- Cow moose population will naturally manage itself without intervention from humans or the department

Proposal 210 5 AAC 92.540. Controlled use areas. By Roggie Hunter. Move the boundary of the Wood River Controlled Use Area.

- We oppose Proposal 210 to move the boundary of the Wood River Controlled Use Area, so that motorize vehicles can be utilized to hunt moose in September moose season
- The objective and intent for Wood River Controlled Use Area is being met, there isn't a need to make changes
- Our reasons for not changing Wood River Controlled USE Areas are the same as under Proposal 151 comments

Proposal 213 5 AAC 92.540(H)(ii) Controlled use areas. By Fairbanks Advisory Committee. Allow motorized vehicle access in Yanert Controlled Use Area in Unit 20.

- We oppose Proposal 213 to allow motorized vehicle access in Yanert Controlled Use Area in Unit 20 to hunt for moose
- Major trespass will occur to Ahtna, Inc. lands, which are situated near Yanert CUA
- Trespass will occur on lands in McKinley Village too
- Allowing motorized vehicle access will negatively affect subsistence uses
- Increase of hunting pressure will occur if motorized vehicles are allowed in Yanert CUA

Proposal 233 5 AAC 92.540. Controlled use area. Establish a new controlled use area near Denali. By Jim Stratton, National Parks Conservation Association.

- We strongly oppose Proposal 233 to "establish a new controlled use area near Denali"
- A newly formed controlled use area for the public to view wolves and creating "wolf townships" isn't necessary. There is a public viewing area in the Denali National Park
- Creating a new CUA will have an adverse effect on the moose and caribou populations
- A wolf township will create an impact upon subsistence users and other wild game
- There is no conservation concern for wolves within this area
- More CUAs with restrictions will impede subsistence users from harvesting wild game

Proposal 245 5 AAC 85.045(11). Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Re-authorize the drawing permits hunts for antlerless moose in Unit 13.

- We oppose Proposal 245
- This proposal will cause the moose population to crash
- Taking cow moose will cause hunters to harvest too many cows and crash the moose population. This happened in the 1970s, when there was an open season for cow moose
- Unit 13 is an impacted hunting area and too many hunters will take advantage of this proposed cow moose hunt
- Moose population in Unit 13 can naturally manage itself without intervention from humans or

the department

RC45

National Park Service
BOG Staff Report
March, 2012

Mr. Chair, members of the Board,

My name is Debora Cooper. I'm the Associate RD for the Alaska Region of the Nat'l Park Service. I oversee the NPS's natural, cultural and subsistence resource programs.

I'm here today to give an update, and to again request specific and explicit exclusion of NPS managed land from proposals directly or indirectly linked to intensive management programs.

The Park Service currently has five separate closures in the process of being listed in Nat'l Park Service Compendium. Two of those are carried over from a previous year, and three will be listed for the first time in 2012. This is a place we've never been before. And, depending on the outcome of this meeting, we may be looking at additional closures. This is all new, and it's not a situation we're looking forward to perpetuating.

To a great extent, it's the result of a difference in mandates. The BOG is bounded by State statue. State wildlife management objectives can differ greatly from NPS's direction to manage for natural ecosystems & natural processes. The laws of the National Park Service, beginning in 1916 with the NPS Organic Act, establish the foundation that directs management. ANILCA is an important part of the framework. While ANILCA provides for some differences in Alaska, as an Act of the US Congress, it makes clear that federal responsibilities for conservation remain the fundamental priority. These responsibilities are further informed by NPS management policies. In the Park Service, management policy is not discretionary and can only be waived by the national director.

On the ground, the objectives of abundance-based management, that is, maintenance of high prey populations; are incompatible with these NPS laws and policies. It is understood that management measures may not be targeted at

park lands, however some proposals affecting park lands are adopted, or modified to affect park lands and adopted.

'NPS management policies direct managers to maintain the natural fluctuations and processes of plant and animal populations. Activities intended to reduce the number of native species for the purpose of increasing the numbers of harvested species are prohibited.'

Methods and means such as spot lighting, the taking of cubs, the taking of sows with cubs, wolves with young pups, the practice of denning or snaring bears is completely foreign to the management of national parks–*here or anywhere.* 'Consistent with sound management principles and conservation of wildlife, practices that disturb animals when they are in a vulnerable state—in their dens, when reproducing, injured, or very young—are usually avoided.'

The NPS would like to move toward a collaborate, cooperative stance. The NPS strongly supports hunting as an American heritage. And the NPS strongly supports subsistence uses of the resource. It is these areas of common ground that we'd like to use as a basis to build cooperative and respectful relationships.

I'd like to conclude with one suggestion. The legislature voted to give the BOG authority to avoid intensive management options under Title 16, F&G Code; specifically Section 16.05.255. Regulations of the Board of Game; management requirements. Subsection (f) does not apply if the board determines that IM would be (A) ineffective based on scientific info, (B) inappropriate due to land ownership patterns, or (C) against the best interest of subsistence uses.

The NPS believes that this statutory language, particularly (B) "inappropriate due to land ownership patterns;" is applicable in circumstances where proposals are directly or indirectly linked to measures of intensive management.

Thank you Mr. Chair. I sincerely appreciate the opportunity to give this update; particularly during the staff and agency report section of the agenda.