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01 DEC 2014

Ted Spraker, Chairman  
Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

During the Southeast Alaska Subsistence Regional Advisory Council (Council) meeting in Wrangell on October 21-23, 2014, the Council adopted the following comments on State of Alaska Board of Game proposals.

**PROPOSALS 1-3** – Open a fall brown bear season for residents in Unit 3.

Current Federal regulations: There is no fall brown bear season in Unit 3.

Council Position/Recommended Action: **Support**

Rationale:

- Provides increased opportunity for Unit 3 rural residents.
- Provides an opportunity to harvest a fall bear for a possible culture camp.
- There appears to be a sustainable population.
- No adverse effect to subsistence users.

**PROPOSAL 7** - Modify the definition of a legal moose antler for Units 1B and 3 so points that grow out of the base of the antler shall not be counted when determining legal antlers in the RM038 moose hunt.

Current Federal regulations: There are no corresponding Federal regulations.

Council Position/Recommended Action: **Support**

Rationale:

- Basal points are hard to see and shouldn't make antlers illegal

**PROPOSAL 8** –Establish a resident drawing hunt for goats in Unit 4, Sitka area.

Current Federal regulations: Federal regulations require obtaining a State Registration permit.

Council Position/Recommended Action: **Oppose**

Rationale:

- Reduces opportunity for subsistence users

**PROPOSAL 14** - Reduce the harvest level of wolves in Unit 2 from 30% to 20% of the fall population and wounded wolves would count against a hunter's bag limit for the regulatory year.

Current Federal regulations:

*Hunting: Wolf: 5 wolves. Federal hunting and trapping season may be closed when the combined Federal-State harvest quota is reached. Any wolf taken in Unit 2 must be sealed within 14 days of harvest.*

*Trapping: Wolf: No limit. Federal hunting and trapping season may be closed when the combined Federal State harvest quota is reached. Any wolf taken in Unit 2 must be sealed within 14 days of harvest.*

Council Position/Recommended Action: **Support**

Rationale:

- The Unit 2 wolf population is at an appropriate level.
- 20% harvest provides sufficient management flexibility and control at this time (can change later if needed).
- This action addresses current Threatened and Endangered Species listing concerns.

**PROPOSAL 15** – Allow trappers to take beaver in Unit 2 with a firearm.

Current Federal regulations: Firearms are prohibited for taking beaver in Unit 2.

Council Position/Recommended Action: **Support**

Rationale:

- Increases opportunity for subsistence users

**PROPOSAL 17** – Increase the resident bag limit for deer on Lincoln, Shelter and Sullivan Islands to six deer of which the last 2 must be male.

Current Federal regulations: The harvest limit for deer in Unit 1C is 4 deer; female deer may be only taken from September 15 through December 31.

Council Position/Recommended Action: **Oppose**

Rationale:

- Would increase competition with subsistence users.
- Long-term effects on population would reduce hunter opportunity.
- Would provide a divergence between Federal and State regulations because the State harvest limit would become more liberal than the Federal subsistence limit.

**PROPOSAL 22** – Shift the resident moose season two weeks earlier in Unit 5B, Manby Shore area. The season would change from September 1-December 15 to August 15-December 1.

Current Federal regulations: The moose season for 5B is September 1 through December 15.

Council Position/Recommended Action: **Oppose**

Rationale:

- The weather is still warm prior to September 1 and there will be an increased opportunity for wasting meat.

**PROPOSAL 27** – Allow elderly and disabled hunters to start hunting deer earlier in the session in Units 1-5.

Current Federal regulations: There are no corresponding Federal regulations.

Council Position/Recommended Action: **Oppose**

Rationale:

The Federal Subsistence Board rejected a similar proposal (WP14-04) in the 2014 Federal wildlife regulatory cycle. The Southeast Alaska Subsistence Regional Advisory Council provided the following rationale for rejection which was accepted by the Board as justification for opposing the proposal:

- There is no conservation concern with the present deer regulations in Unit 2 that is addressed by this proposal.
- Determining disability has been shown to be complex and problematic, and add an additional administrative barrier to participants because this provision would require a separate Federal subsistence hunting permit. The requirement for a separate permit is not valid if the State adopts this proposal. Adopting this proposal would result in a divergence between State and Federal regulations.
- Establishing a hunting season that spans two regulatory years creates complexity by requiring hunters maintain two sets of harvest tickets, and harvest reporting would be delayed by almost half a year.
- The proposal is unnecessary to provide additional opportunity as the current season provides for ample chances for residents, of any age or physical condition to either hunt for themselves or to designate others to hunt for them.

**PROPOSAL 37** – In southeast Alaska, Add five days at the start or end of all hunting seasons and allocate 75% of all drawing permits to residents.

Current Federal regulations: There are no corresponding Federal regulations.

Council Position/Recommended Action: **Oppose**

Rationale:

- Seasons are sufficiently liberal.
- Residents of Southeast Alaska already receive more than 75% of drawing permits.

Thank you. Any questions regarding this letter can be addressed directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, Alaska 99833, (907) 772-5930, robertlarson@fs.fed.us.

Gunalchéesh,



Bertrand Adams Sr.  
Chair

cc: Beth Pendleton, Regional Forester, United States Forest Service  
Chad VanOrmer, Admiralty District Ranger, United States Forest Service  
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management  
Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management

Ted Spraker, Chairman

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George Pappas, State Liaison, Office of Subsistence Management  
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management  
Robert Larson, Council Coordinator, United States Forest Service  
Interagency Staff Committee  
Administrative Record

