ALASKA BOARD OF GAME
October 23, 2016 Special Meeting | Teleconference

On-Time Public Comments Index

Comments on Agenda Change Requests

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Tanana Chiefs Conference
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September 22, 2016

Alaska Administrative Code Number 5 AAC: 5AAC 92.530

Tanana Chiefs Conference Wildlife and Parks Comments to proposed ACR for new Tanana/Yukon River Road Management Area

This Agenda Change Request (ACR) is intended to support and enhance sound wildlife management on State lands within State Game Management Unit 20. Although similar in nature to the Dalton Highway Corridor Management Area (DHCMA) this ACR is not intended to be as restrictive and the only significant change for State Game Management Unit 20 areas (including Middle Yukon) under hunting regulations is for moose, bear and wolf harvest and seasons in the Middle Yukon Tanana River area near the new Tanana/Yukon River road. And then also recommend minimal changes to hunting of furbearers under State trapping regulations. These new regulations for Unit 20 were requested to either simplify regulations across Unit boundaries for less regulatory complexity for subsistence and general use hunters or to increase hunting opportunity and the address public safety and management, as well as access concerns.

The other significant issue the ACR that we generated includes is to set a new management area around the road to address private land ownership access for those who own private lands within the proposed management area and protect their long-term use of those lands. There should be no impacts by this ACR to long time miners and other private land owners on the use of their lands under discussion here, but protect those uses.

At the current time as the new road is in use, there are no regulations in place to manage wildlife within the 2 miles on each side of the road. As the road is publicly open at this point in time, this gives the Board of Game time to act to better manage this new area as it becomes fully open to the public. We all know what can happen when you open hunting to an area that has not been hunted heavily in the past. In wildlife science we rely on wildlife populations to have source areas (Furrer and Pesinelli 2016; Harvenson et al 2004) where there are thought to be minimal hunting pressure of large mammals to increase diversity of the hunted species in question. When you open a new area and hunt it hard it may take years if not decades to recover. Historically the majority of hunting use within these areas in this region was largely along the Yukon and Tanana Rivers. When these animals venture far from the source of their birth lands they can get harvested at a sustainable level in regard to the overall population. But when you go to remote

birth and denning areas then you remove a portion of the animals that have never been significantly hunted and then expose them to unsustainable hunting pressure. The Board in the past has set up management areas in the past to reduce competition and enhance management.

The intent of this proposal may reduce competition but it is the critical wildlife science and management that needs to be addressed here. When you look at what happened with Game Management Unit (GMU) 24 there was initially no protections along the DHCMA for caribou. The new hunters along the road targeted leaders of the Central Caribou Herd that had migrated into lower GMU 24 for thousands of years. The original history of the area and animals were carried through wisdom keepers in our culture (Attla 1989; Nelson 1986). Through extremely poor management that caribou herd has not migrated back into the Lower Koyukuk and Melozitna River area for over 4 decades now. This is the type of bad science and wildlife management we want to avoid in the future, and we should be looking at all ways of understanding complicated systems (Huntington 2000; Watson and Huntington 2008; Huntington and Watson 2012).

When the late Sidney Huntington sat on the Board of Game he created Controlled Use Areas that still exist today (Huntington 1993). He could see more than just competition should be addressed in these areas for prudent management of wildlife. It is no secret he and his brother the late James Huntington and respected Galena Elder Donald Stickman did their own predator management before anyone else saw the value of what it meant to those who needed game to hunt to survive (Huntington 1966). But those areas also protect source moose populations that birth and have core calving areas far from the river where they thrive until they venture into hunting areas along the river. Along the Koyukuk and Middle Yukon River these moose populations still show strong diversity because by creating management areas that make sense to common hunters and the science community you enhance sustainable hunting privileges to all.

In our opinion we feel the Department of Fish and Game needs the tools to manage this area as it is open to the general public. Every bit of information needs to be considered and all ways of knowing should be our base of understanding in these changing times. The adaptive management strategy will come forth as local and urban Advisory Committees create fair regulations along the new Tanana Road Corridor Management Area. We all benefit by protecting State resources along the road if we plan for long-term uses rather than short term strategies that never work. With the changes in our climate in Alaska and throughout the world we need more community based research data to understand all aspects of our world (Huntington et al.2006), and when you look at current management of fish and game it should be with an open mind to create more opportunity for future generations of hunters and trappers.

We feel there may be potential to over harvest populations within the new Corridor but with adaptive management and regulations in place we should be all be able to enjoy hunting in the area in the future. These are our management concerns and we do not feel that they are allocative in nature. But if the Board feels that way we understand and would like as much public participation for discussions of this matter into the future. We hope you will deal with this issue now, rather than wait for something that is less than sustainable when it comes to prudent management of wildlife in the area for future generations of hunters and trappers.

Citations/references:

Attla, C. (1989) Bakk'aatugh Ts'ubuniy: Stories we live by. Fairbanks; Yukon Koyukuk School District and Alaska Native Language Center, College of Liberal Arts, University of Alaska. 5.

Furrer, R.D. and Pasinelli, G. (2016) Empirical evidence for source-sink populations a review on occurrence, assessments and implications. Biol Rev, 91: 782-795 doi: 10.1111/brv.12195

Harveson et. al. (2004) Source-sink dynamics of Florida Deer on Big Pine Key, Florida. Journal of Wildlife Management 68 (4): 909-915.

Huntington, H. (2000). Using traditional ecological knowledge in science: Methods and applications. Ecological Applications,
10(5), 1270–1274.

Huntington,H. P.,Trainor,S. F.,Natcher,D.C.,Huntington,O.H.,DeWilde, L., & Chapin, F. S. (2006). The significance of context in community-based research: understanding discussions about wildfire in Huslia, Alaska. Ecology and Society, 11 (1), 40.
http://www.ecologyandsociety.org/vol11/iss1/art40/.

Huntington, J. with Elliot L. (1966) On the edge of nowhere. Kenmore, Wash; Epicenter Press 2002.

Huntington, O. H., & Watson, A. (2012). Interdisciplinarity, native resilience, and how the riddles can teach wildlife law in an era of rapid climate change. Wicazo Sa Review, 27(2), 49–73.

Huntington, S. with Reardon J. (1993) Shadows on the Koyukuk; An Alaskan Native's life along the river.

Nelson, R. (1986) Make prayers to the Raven: A Koyukon view of the Northern Forest. Chicago: University of Chicago Press.

Watson, A. and Huntington, O. ((2008) They're here – I can feel them; the epistemic spaces of indigenous and western knowledges. Social & Cultural Geography 9 (3); 257-281.

Submitted By
Charles Derrick
Submitted On
10/12/2016 10:30:24 AM
Affiliation
Self

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I am addressing ACR2 submitted by Tanana Chiefs.

I am **strongly against** the BOG establishing a manangement area **of any distanc**e along the new Tanana Road in unit 20 from Manley to the Yukon River. This seems to be the norm now that when any new road is built, whether extending Alaskas highway system or roads to new mines, a request is submitted to establish access ristrictions for use of the road or to hunt and fish off of the road.

This new road to Tanana is just an upgrade of The Tofte RD a historical mining trail, which has been used for hunting and fishing access for as long as I can remember, and I am a 45 year Alaska resident.

By their request, Tanana Chiefs hopes to extend their non shareholder access restrictions from their ANILCA selected lands to Alaska State lands. ANILCA allowed regional and village native corporations to select lands that were most important to their subsistence lifestyle, but now they hope to extend their authority to lands owned by all residents of Alaska.

Alaska residents need more access to our lands, not less

Submitted By
Stephen F. Ostanik
Submitted On
10/12/2016 3:45:35 PM
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~~I am addressing ACR2 submitted by Tanana Chiefs.

I am completley against the BOG establishing a manangement area of any distance along the new Tanana Road in unit 20 from Manley to the Yukon River, or anyplace else for that matter. This seems to be the norm now that when any new road is built, whether extending Alaskas highway system or roads to new mines, a request is submitted to establish access ristrictions for use of the road or to hunt and fish off of the road.

I believe this new road to Tanana is just an upgrade of The Tofte RD a historical mining trail, which has been used for hunting and fishing access for as long as I can remember, and I am a 39year Alaska resident.

By their request, Tanana Chiefs hopes to extend their non shareholder access restrictions from their ANILCA selected lands to Alaska State lands. ANILCA allowed regional and village native corporations to select lands that were most important to their subsistence lifestyle, but now they hope to extend their authority to lands owned by all residents of Alaska.

This is just wrong and is discrimination against many Alaskans. keep off native land signs keep popping up all over. parks highway around and past cantwell, now in on the Denali highway, a few now on the Taylor highway and many more. there are about twice as many people in Alaska now as when i got here and we now have less land to hunt on. We alaskan paid for this road and now are subject to possible rules to keep us out or at least 2 miles from hunting. will tanana residents etc follow the same rules, NO. this type of rule on the Dalton is a mess and hard to deal with, as you well know the road is not straight and causes lots of problems because of the 5 mile rule. yet the folks living along the highway do not have to live by the rules. More discrimination.

Alaska residents need more access to our lands, not less! We also need not be descriminated against just because we do not live in a certain place. ALL RULES SHOULD APPLY TO ALL ALASKANS.

Stop giving special treatment to special groups. No two mile boundray on the new Tanana road or any other place

TIA

Mr Steve Ostanik

North Pole Alaska

Submitted By
Steve Adams
Submitted On
10/12/2016 4:18:07 PM
Affiliation

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Fairbanks, Alaska 99708-1814

The road to Tanana does not need a so called "management area" as proposed in ACR2 submitted by Tanana Chiefs. I am **strongly against** the BOG establishing a manangement area **of any distanc**e along the new Tanana Road in unit 20 from Manley to the Yukon River. This seems to be the norm now that when any new road is built, whether extending Alaskas highway system or roads to new mines, a request is submitted to establish access ristrictions for use of the road or to hunt and fish off of the road. All that does is restrict the hunting and fishing to certain people, and flies in the face of common sense. Fish and game belongs to ALL Alaskans, not just a select group, which this proposal is trying to create. Enough already!

This new road to Tanana is just an upgrade of The Tofte RD a historical mining trail, which has been used for hunting and fishing access for at least 40 years, and longer. There is no reason to change that. By making this request Tanana Chiefs hopes to extend their non shareholder access restrictions from their ANILCA selected lands to Alaska State lands. ANILCA allowed regional and village native corporations to select lands that were most important to their subsistence lifestyle, but now they hope to extend their authority to lands owned by all residents of Alaska, and that is just plain wrong!. Alaska residents need more access to our lands, not less!

Steve Adams

Submitted By
Ross Beal
Submitted On
10/12/2016 4:27:13 PM
Affiliation

I strongly object to creating a management corridor 2 miles either side of the new road to the Yukon near Tanana. Alaskan's need more access not less.

Submitted By
Damien Delzer
Submitted On
10/12/2016 4:37:25 PM
Affiliation

I am opposed to any corridor restriction on the road to Tanana. With the continued encroaching federal overreach, Alaskan's need MORE access to public lands, not less.

Thank you for your consideration.

Damien Delzer

Submitted By
neil eklund
Submitted On
10/12/2016 5:04:10 PM
Affiliation

NO to request from Tanana Chiefs to establish a management area 2 miles on either side of the new road to Tanana and the Yukon River. They already have private land claims and corporation lands. If it is State of Alaska or BLM land along the new road then there should be access for ALL Alaskans, not a select few. If the State paid for the road then the citizens of the state should have full access. Did Tanana Chiefs pay for the road?

Submitted By
Rick Gray
Submitted On
10/12/2016 6:04:56 PM
Affiliation

I am a life long resident, born in Alaska in 1954. I have lived in Manley for 31 years. We eat moose meat and have not purchased red meat for over 30 years. On the one hand, it would be wonderful to install restrictions on hunting in the close proximity of my home. Same thought line as Tanana residents. But pure selfish and wrong. We Alaskan residents need all the area to spread out with our hunting pressure as we can have. No more loss of area is acceptable. Buffer zones or other restrictions are regularly proposed it seems, but never new areas. My opposition is firm. Your obligations are to all of us, not to a specific group.

More restrictions like this proposal that applied to only non-resident hunters would be logical, proper, and welcome.

Thank you.

Submitted By
daniel eddy
Submitted On
10/12/2016 8:35:02 PM
Affiliation

I am addressing ACR2 submitted by Tanana Chiefs. I am strongly against the BOG establishing a manangement area of any distance along the new Tanana Road in unit 20 from Manley to the Yukon River. This seems to be the norm now that when any new road is built, whether extending Alaskas highway system or roads to new mines, a request is submitted to establish access ristrictions for use of the road or to hunt and fish off of the road. This new road to Tanana is just an upgrade of The Tofte RD a historical mining trail, which has been used for hunting and fishing access for as long as I can remember, and I am a 32 year Alaska resident. By their request, Tanana Chiefs hopes to extend their non shareholder access restrictions from their ANILCA selected lands to Alaska State lands. ANILCA allowed regional and village native corporations to select lands that were most important to their subsistence lifestyle, but now they hope to extend their authority to lands owned by all residents of Alaska. Alaska residents need more access to our lands, not less!

Submitted By
Sergey Serebrennikov
Submitted On
10/12/2016 9:22:09 PM
Affiliation

I strongly oppose request from Tanana Chiefs to establish a management area 2 miles on either side of the new road to Tanana and the Yukon River as Alaska residents need more access not less to our natural resources.

Sergey Serebrennikov.

Submitted By
Shawn
Submitted On
10/13/2016 8:38:19 AM
Affiliation
RHAK

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I am addressing ACR2 submitted by Tanana Chiefs.

I am strongly against the BOG establishing a manangement area of any distance along the new Tanana Road in unit 20 from Manley to the Yukon River. This seems to be the norm now that when any new road is built, whether extending Alaskas highway system or roads to new mines, a request is submitted to establish access ristrictions for use of the road or to hunt and fish off of the road.

This new road to Tanana is just an upgrade of The Tofte RD, a historical mining trail, which has been used for hunting and fishing access for many decades.

By their request, Tanana Chiefs hopes to extend their non shareholder access restrictions from their ANILCA selected lands to Alaska State lands. ANILCA allowed regional and village native corporations to select lands that were most important to their subsistence lifestyle, but now they hope to extend their authority to lands owned by all residents of Alaska. This is a public DOT road built by taxpayers of the United States and Alaska money, not Tanana Chiefs money. They should not have the power to dictate public use off of this road.

Alaska residents need more access to our lands, not less.

Shawn Davis

Submitted By
Jim Sackett
Submitted On
10/13/2016 9:02:27 AM
Affiliation
Mr.

I strongly oppose the proposal ACR2 to create a management corridor of any distance along the new road from Manley to Tanana. Alaskans need more access to hunting to relieve pressure and crowding. Most of Alaska is already tied up under restrictive management from various land owners. Please dismiss this proposal to create a corridor, thank you.

Respectfully Submitted,

Jim Sackett

Fairbanks, Alaska

Submitted By
Jon Holmgren
Submitted On
10/13/2016 9:31:52 AM
Affiliation
None

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Regarding ACR2 submitted by Tanana Chiefs

I am strongly against creating a four mile wide management corridor along any section of the Manley to Tanana Road. This is a state road paid for and maintained by the state of Alaska and should be open to hunting by Alaska residents on state ground as it has always been.

By this measure Tanana Chiefs are trying to close off land to Alaska hunters and fishermen that has always been open and has been commonly used via the road to Tofty and trials beyond. They have private land along this corridor and it should be respected, but we have public land and our rights along it should be respected as well.

Thank you,

Jon Holmgren

Submitted By
Brett Evens
Submitted On
10/13/2016 9:50:09 AM
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As a resident Alaskan and hunter, I am strongly opposed to restricting access on the new road to Tanana. Where do the rules and restrictions end? Why do we need to make things more complicated? Do we make a corridor on the tanana and Yukon rivers next? This is special interest regulation, and not in the best interest of Alaskans as a whole. Additionally, with the potential added restrictions, who will be doing the additional emforcement, and where will that funding come from? With a 4 billion state deficit, we don't need additional regulations requiring additional enforcement. The state and regulators should be creating a more permissive environment that will allow sustainable harvest and provide more opportunities for resident and non residents to access the resources. Restricting access will have a negative economic impact on interior Alaska and the Yukon River communities in particular.

Submitted By
Sarah
Submitted On
10/13/2016 9:54:01 AM
Affiliation

As an Alaskan resident, I strongly oppose any management corridor between Manley and Tanana.

Thank you.

Submitted By
Dusty Spencer
Submitted On
10/13/2016 2:20:42 PM
Affiliation
AK resident

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I strongly oppose the 2 mile corridor proposed by the Tanana Chiefs ACR2, as it restricts resident hunters from using state lands to hunt that have been using it for generations. The new road is just an upgrade of the Tofte RD that is already being used. The Tanana chiefs council is only trying to extend their authority to lands that are owned by all residents of Alaska. ANILCA shouldnt apply to this situation. Alaska Residents need more access to our lands, Not Less...

Submitted By
Steve Adamczak
Submitted On
10/12/2016 11:42:55 AM
Affiliation

I am **strongly against** the BOG establishing a manangement area **of any distanc**e along the new Tanana Road in unit 20 from Manley to the Yukon River. The Tanana Road is an upgrade and extension of a historical mining trail, which has been used for hunting and fishing access for decades. This road provides Alaskans improved access to public lands and rivers for hunting fishing and trapping opportunities; the road like any other road or trail in Alaska does not grant these rights on any native or privately owned lands.

By their request Tanana Chiefs hopes to extend their non shareholder access restrictions from their ANILCA selected lands to Alaska State lands. ANILCA allowed regional and village native corporations to select lands that were most important to their subsistence lifestyle, but now it appears they hope to extend their authority to lands owned by all residents of Alaska.

It also is evident that past efforts through ANILCA selection of lands that efforts were made to restrict access to public lands by selecting narrow strips of land along existing highways and rivers; selecting checker board blocks of land, etc.; effectively blocking reasonable access at many locations. The Dalton highway managment corridor, mine roads (Pogo) and others are also examples of failed opportunities to access public lands.

Alaskans need more access to public lands and with a possibility of new roads or mining trails in the future; I encourage you to set a precedent by **not** establishing a management coridor limiting access.

Thanks you

Submitted By
Jeffrey Bushke
Submitted On
10/12/2016 11:42:19 AM
Affiliation

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In regards to a corridor along the new road out of Manley for the benefit of some and the detrement of others, I strongly urge the BOG to not restrict access. We need more access to lands, not less. A management corridor would only benefit some Alakans, not all Alaskans.

Submitted By
Brendon
Submitted On
10/13/2016 4:58:18 PM
Affiliation

I am commenting to address ACR2 submitted by Tanana Chiefs.

I am **strongly against** the BOG establishing a manangement area **of any distanc**e along the new Tanana Road in unit 20 from Manley to the Yukon River.

This new road to Tanana is just an upgrade of The Tofte RD a historical mining trail, which has been used for hunting and fishing access for many years. I am a Lifelong Alaska, resident road access to hunting lands is important for my family and I to experience and sustain ourway of life in this great land. This land is owned by all residents of Alaska and open hunting access should be preserved for all Alaska residents to benefit from. Alaska residents need more access to our lands, not less.

SELDOVIA VILLAGE TRIBE

Tradition Integrated with Technology

October 12, 2016

ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

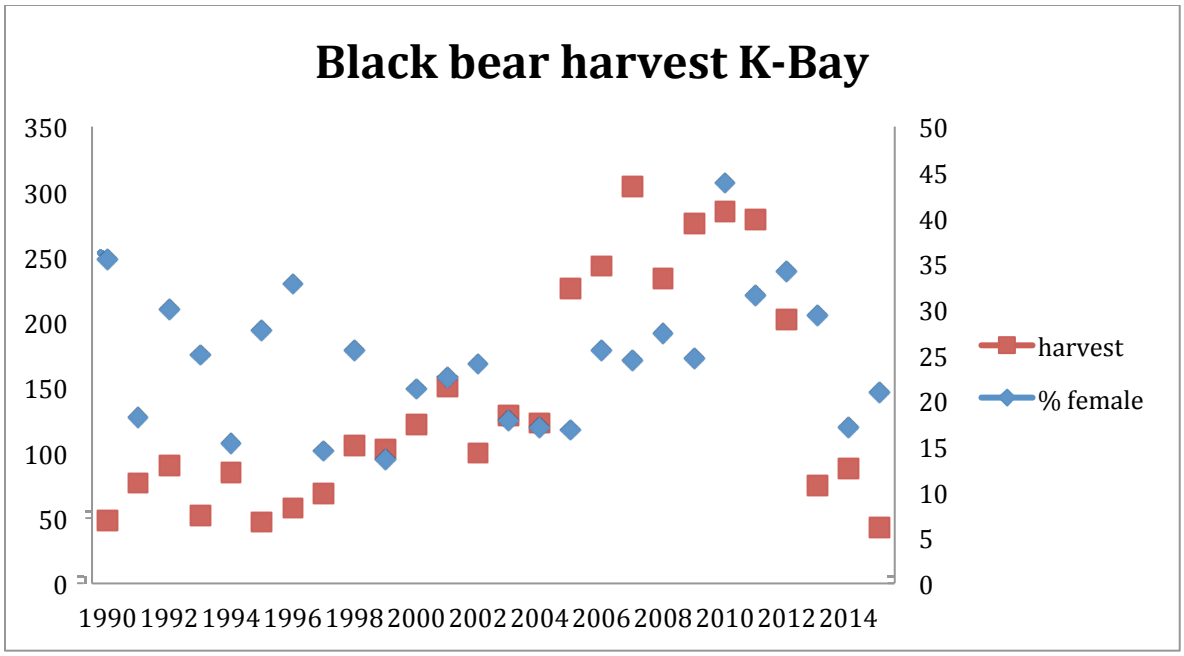
Re: Seldovia Village Tribe ACR

To Whom It May Concern:

Seldovia Village Tribe is happy to submit this Agenda Change Request (ACR) regarding the declining black bear populations south of Kachemak Bay in subunits 15C and 7 from Bear Cove around the Peninsula to upper Nuka passage.

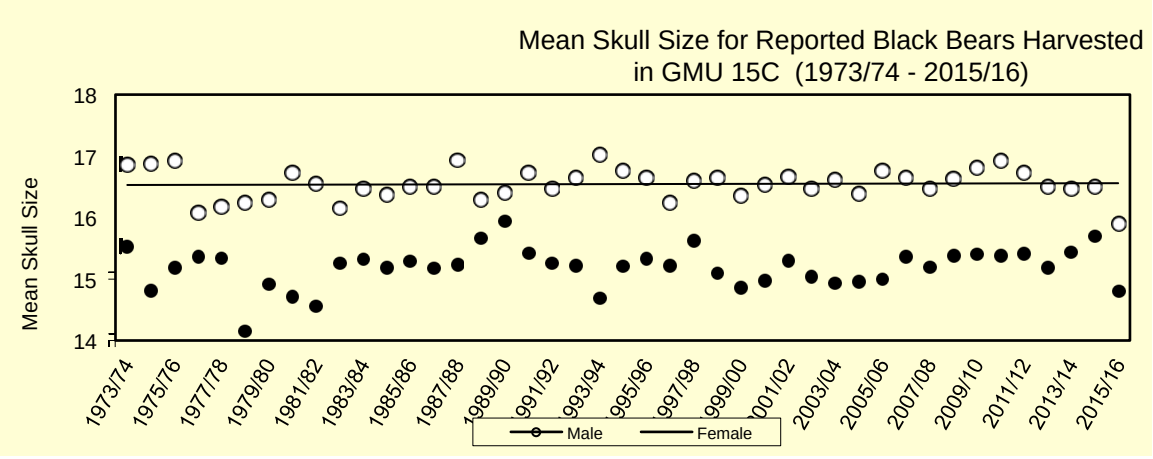
In 2009 Proposal 126 went before the Advisory Committees of Central Peninsula, Kenai/Soldotna, Seward, Cooper Landing, and Homer but it did not go before the Seldovia Advisory Committee, or it at least did not get a vote from the Seldovia Advisory Committee. In the harvest graph in 2009 you can see the steady climb of black bear harvest rates in Units 7 and 15. The multi year graph shows that there was a rather steady increase in black bear harvest starting in 1994. Newer data shows that the black bear harvest in Kachemak bay peaked around 2007 at around 300 bears taken and approximately 74 females. Then in 2009 another peak shows approximately 280 bears taken and approximately 68 females taken. In 2012 harvest of black bears is declining in numbers. For eight straight years, 2004 to 2012, there were over 200 black bears taken annually from the Kachemak Bay area. So after 2007 the population was no longer sustainable and not able to support the extra harvest of one more bear a year per hunter, but ADF&G increased that limit to 3 in 2009 when the bears were already in decline. ADF&G did this without any actual science to back up the harvest increase. You can read it in the ADF&G proposal that they did this on a “belief” that this population could sustain that extra harvest.

Since hitting a peak harvest in 2010 of 325 black bears for unit 15C, the harvest has had a steep decline to the 2015 harvest of 74 bears. 285 of the 2010 harvested black bear were from Kachemak Bay. Also in 2010, 43.85% of the bears taken were females. The three years after 2010 also had higher than average female harvest although a steep decline in overall harvest.



The most noticeable decline was in 2015, but a decline in black bear population has been apparent for some time. In the mid 1990s, the Seldovia area had a significant population of large bears. In some years upwards of thirty black bears were taken out of the Seldovia area. We know this number is not the whole for Kachemak Bay or Unit 15Cbut just what was tagged and sealed here in Seldovia. Now it is rare to see large bears; most bears are small and generally under two years of age.

In the past few years you can see the steep decline in average skull size in the graph provided.



Hunters have been coming to Seldovia to hunt bears because of the ease of access and now have been shooting sows with cubs and leaving the cubs to fend for themselves. We are faced with two options, both of them poor, for dealing with these orphans: sending them out of the community only to have them be put down because there is

usually no space for them in rehabilitation facilities, or releasing them near the local landfill where they would have the best chance to fend for themselves.

Seldovia Village Tribe's President/CEO, Crystal Collier, and Seldovia Village Tribe's Environmental Coordinator, Michael Opheim, had a call with the local area biologist in Homer who had raised the harvest limit to three. He said he did so with no study of the population to back it up. In our opinion, a population study should have been the done to ensure this increase was warranted. Now we are left with a depleted population that is only going to continue to steadily decline if a change isn't implemented to allow the black bear population to bounce back to a sustainable level.

Under the current plan, this regulation is not due to be re-examined until the 2019 board meeting. Significant damage may be done to the bear populations in subunits 15C and 7 in that time.

Black bears are vital to both the ecology and the economy of the Seldovia area, and are an important subsistence food as well. In order to preserve this relatively isolated population, and particularly to protect the few remaining larger bears that contribute most significantly to population recruitment, we are making this Agenda Change Request for the Alaska Board of Game's upcoming meeting, to consider lowering the annual bag limit per regulatory year from three bears to one. This change will still allow some hunter opportunity, while not subjecting the local bear population to harvest levels that have not yet been supported by scientific assessment of the population viability and habitat carrying capacity.

Thank you,

SELDOVIA VILLAGE TRIBE

Crystal Collier

Crystal Collier
President/CEO

Submitted By
Madeline Scholl
Submitted On
10/11/2016 10:19:44 AM
Affiliation

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As a volunteer and supporter of local and state animal welfare and rescue groups, I would like to submit this comment in support of the Board's acceptance of the Agenda Change Request document submitted by Shannon Basner and the non-profit organization, Mojo's Hope. The ACR is clear, concise, and addresses a long overdue state-wide public issue--the lack of a responsible, sustainable, humane, and scientifically-proven method of managing community cat colonies through Trap-Neuter-Return (TNR) programs. There is abundant support of TNR programs in my community (Anchorage Municipality) from volunteers and a great network of non-profit/rescue groups. Please accept the ACR submitted by Ms. Basner and Mojo's Hope so that we may continue the administrative/legal process toward implementing a TNR program. I look forward to listening in on the Oct. 23 meeting. Thank you for your consideration. -Madeline Scholl

Submitted By
Timothy Sell
Submitted On
10/13/2016 8:05:41 AM
Affiliation

Concerning west Nile virus testing for exporting and reimporting. I just last night went to my local vetrenarian to have a West Nile vacine administered to my goshawk that I am taking down to Idaho for a falconry meet. From what I understand the west nile virus concerns are not valid as far as falconry birds are concerned. please remove west nile testing from our falconry regulations. Thanks for your work.
Sincerely, Timothy Sell

ALASKA PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524
Phone: (907) 929-0619
Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

John "Thor" Stacey
Director of Government Affairs
(907) 723 1494
thorstacey@gmail.com

October, 13 2016

To: Kristy Tibbles, Alaska Board of Game

From: Alaska Professional Hunters Association, INC.

Re: Public Comment, Reconsideration of "Proposal 51"

Reconsider Proposal 51

Alaska Professional Hunters Association (APHA) supports reconsideration of *Proposal 51*. *Proposal 51* was amended and passed in March 2016 after incorrect hunter participation data was presented to the board by the department. APHA always intended to offer a balanced regulation that clarified certain bag limits, while addressing other concerns that we have regarding 2nd degree kindred participation, especially in regard to drawing and registration permit hunt structures. While APHA authored and supported this proposal, we are concerned that *Proposal 51*, as amended, is excessively punitive to Alaskan residents taking their family members hunting in some general season hunts for sheep, goats and brown bears. These issues, and others, prompt us to ask that you please reconsider *Proposal 51* so this concept can be thoroughly vetted and discussed using complete and accurate hunter participation data.

Hello all,

I ask you all to consider reconsider the board's regulatory action from March 2016 concerning bag limits for brown bears, mountain goats, and sheep taken by non-residents who are accompanied by resident relatives within the second-degree of kindred.

The Alaska professional Hunters association has proposed regulations that would limit residents who hunt with family to be structured the same as the language of the youth hunts. This change is slated for between now and July 1st 2018. Residents who hunt with non-resident family would have to count an animal harvested against their bag limit in the case of brown bear, sheep and goats.

This is a one sided attempt by individuals within a professional organization at securing an increased percentage of the take of a limited amount of game. I see this as a one sided attempt to take a resource that belongs to all of us who cherish this hunting heritage and tradition and secure it for a limited few to make more money from. This is a blatant misguided decision to squeeze out others for their own personal gain. The individuals that orchestrate this are greedy and selfish and cannot share a passion for the game just the dollar, this is disgusting and the individuals that support this are no more ethical then poachers who take game from all of us with blatant disregard for the laws and ethics the hunting industry tries to instil in all of us. This proposal is nothing more than the guiding industry trying to get a larger share of the game at the expense of a few hunters who cherish the opportunity to take to the field with their loved ones and share in this amazing state. The Next of kin language has been and should be a part of this States identity that supports a hunting heritage and responsible management and use of game. If proper scientific facts were presented that supported this proposal and residents that hunted with non-resident family members accounted for the major take of these special game animals than I would support a regulation change or modification to sustainably manage the population and quality of game. That would be a responsible use and policy adaptation to propagate these magnificent animals. Everyone in this room and those that are reading this know that is not the case, this proposal is driven by a group that thinks they are more so entitled to a resource than the rest of the user groups and are looking at any way they can to establish an upper hand and major consumption of a said resource, That's greed not management. If the Board enacts this regulation to establish a preference toward one group and not share the burden of overuse between all groups than the hunting heritage and freedoms we all so dearly cherish will continue to erode until hunting itself here will fall victim to the same exploitation, overuse, big money push and be managed by popular opinion so many other states are now fighting while trying to scientifically manage their game and use.

If the board of game were to be ethical about this like they want all hunters to be than this non-resident hunting issue should be shared amongst all non-residents. I would support a general drawing for these species for all non-residents wither they hunt with guides or family. This would thus evenly distribute the use of the resource among all the non-residents hunters and provide the governing board more tools to manage the game population. If you do otherwise than the Board is giving one user group preferential treatment over other user groups and this issue I fear will continue to be a heated topic for many years to come. Many of us have had family hunt here and purchase a tag for one of these 3 species but as of yet my family has yet to use that privilege and has only purchased the tag several times without filling it. I suspect this to be more often the case than someone using their tag and creating competition for some guide's client. In the end we all just want to hunt, enjoy the field and some of us do it with family. We are almost all from somewhere else, I was not lucky enough to be born here, but Alaska is my home and has been for 20 years.

Steve Roushar -

I am writing the Board of Game because of proposal 51 will shape the future of resident hunting.

I'm a lifelong Alaskan that was born in the territory of Alaska. I adamantly oppose the suggested change that will add more restrictions and limits to Alaska resident hunters and their families.

I am shocked that the state has relinquished game management to the Federal Government in some areas. In other areas the Federal Government ignores Alaskan's constitutional rights to manage our Fish and Game.

Above all, the Board of Game must protect Alaska Residents against special interest groups and the overreach of the Federal Government that continue to reduce Alaska resident's opportunities to harvest fish and game.

Regards,

Brett Pierson

Ahtna C&T Committee Comments for Alaska Board of Game

October 23, 2016 Special Meeting – Proposal 154

Proposal 154 is based on a two requests for special meeting submitted by Ahtna Tene Nene'. The first request was submitted in March of 2016 before the moose and caribou seasons began. Ahtna Tene Nene' predicted that the Community Subsistence Hunts (CSH) for moose and caribou would not provide a reasonable opportunity for all households enrolled in the hunts and asked the BOG to implement a Tier II hunt for the 100 any bull moose quota. The BOG failed to act on this request.

Ahtna's second request was submitted on August 30, 2016 after the season's start when it was clear that the 100 any bull quota was filling quickly and there was not a reasonable opportunity to meet subsistence needs for moose. The request for a Tier II hunt was dropped because of the impossibility of implementing it at the late date. Ahtna asked for several adjustments to the moose and caribou quotas and seasons to address the issues associated with the 2016 season. Both the BOG and ADF&G Commissioner failed to take any action in time to address the failure to provide reasonable subsistence opportunity in the 2016 hunt.

Ahtna also asked in in its second request that the BOG and Commissioner call for a second special meeting "prior to the November 1 opening of the application period for groups to apply to for the 2017 CSH for caribou and moose. The call for a second special meeting should include sufficient public notice and opportunity for comment to allow the BOG to revise the current CSH regulations to conform to the intent of the Board when it first adopted the CSH and eliminate the abuse that has occurred since that time."

The only remaining issues for the October 23 meeting are what additional opportunity the BOG can provide for moose and caribou in the immediate future and how to reform the CSH's.

Additional Opportunities

Ahtna is aware of two possibilities. Additional hunting time and increased bag limit for Nelchina caribou and an additional "winter" any bull moose hunt (CM310). Both should be approved because they will help, but both taken together will not make up for the lack of reasonable opportunity during the 2016 CSH hunting seasons.

Any additional moose and caribou hunting opportunity should be limited to those eligible for the CSH. The December any bull hunt should be the CM300 hunt and should be open for

two days midweek and then closed and opened again midweek until the quota is taken. The quota should be generous.

The winter caribou season will be open on October 21 under current regulations. The only action the BOG can take is to increase the bag limit for CSH households from 1 to 2 caribou. Federal regulations have proven to be more responsive to Ahtna subsistence needs with a bag limit of two caribou per hunter and with an emergency order of October 7 authorizing an additional 10 day season between October 1-20 before the federal winter season begins on October 21 if caribou start to move across federal lands.

Reforming the Moose and Caribou CSHs

Ahtna Tene Nene' has repeatedly asked the BOG to reform the CSH to ensure that the intent of the hunt is realized; that only genuine subsistence based "communities" that are engaged in the customary and traditional use pattern upon which the CSHs were established are eligible to participate in the hunt. The BOG has made several attempts to address this issue including the formation of the "Committee on Copper Basin Subsistence Hunting" in 2014. The means the Board has chosen to address the problem, however, have not worked. To the contrary, many of the Board's actions have resulted in less subsistence hunting opportunity for the eight Ahtna communities that originally established the CSH for moose and caribou in 2009. It is time to clear away all the ineffective band aids and get back to the basics that were used to first establish the CSH in 2009.

If the BOG cannot take the steps necessary to reform the CSH, it should be abandoned and a Tier II any bull hunt should be revived. Abandoning the CSH and falling back to Tier II would be an admission that the State cannot or will not administer its subsistence laws in a way that provides for the opportunity necessary for communities like the Ahtna villages for the continuation of their subsistence hunting way of life without resorting to Tier II.

Tier II could be administered similar to TM300, the Tier II any bull hunt that was in place for a decade before the CSH was established in 2009. The any bull allocation for a Tier II hunt should be generous and well over 100 in order to enable the Ahtna Villages to harvest the 100 any bulls necessary to meet subsistence needs through Tier II permits awarded to the communities. The Tier II season should start well before the general moose hunting season and extend beyond the closing of the general season. Tier II permits should allow any bull harvests throughout Ahtna's traditional territory as that territory is described in 5 AAC 92.074(d), not just in GMU 13. Provisions should be made to allow Tier II permits to be easily transferable to another hunter in the Village to accommodate the traditional pattern of harvest.

Given the short time frame for the October 23 meeting and the restricted opportunity for public involvement, the BOG may elect to kick the can down the road in a number of ways. The BOG could, for example, allow the current regulations to stay in effect through the 2017 season.

This action alone would not address the legal requirement for a reasonable opportunity. There can be no doubt that the current moose CSH does not provide a reasonable opportunity. The attached paper from Bill Simeone helps illustrate the point, and the large and unexpected expansion in the number of groups and household participating in the moose CSH conclusively speaks to the lack of opportunity.

The only means for allowing the current regulations to stay in effect for 2017 would be to establish a Tier II hunt that is limited to those households enrolled in the CSH. The means and rationale for establishing this kind of limited Tier II hunt is explained in Ahtna Tene Nene's March 2016 request for a special meeting.

Another option for the BOG is to repeal the CSH entirely. This action alone would not address the legal requirement to provide a reasonable opportunity for subsistence uses; another subsistence moose hunting opportunity would need to be established. Re-establishing the TM 300 Tier II hunt could fill the gap if the any bull quota for the hunt is sufficient, and if there is a subsistence season for antler restricted moose that provides additional hunting opportunity above what is offered for the general season.

Resorting to Tier II, however, fails to address the fundamental underlying issues for Ahtna and GMU 13 in general; a problem that will get worse in GMU 13 and throughout Alaska with a growing population and greater access to wildlife populations. The problem is that the BOG has failed to apply the criteria for identifying customary and traditional subsistence uses listed in 5 AAC 99.010(b) to determine whether each group that seeks to participate in a CSH is engaged in that C&T pattern of use and therefore engaged in community subsistence uses. The subsistence law requires the BOG to differentiate between subsistence uses and other consumptive uses in order to provide a reasonable opportunity and priority for subsistence uses. It is not possible to fulfill this responsibility unless the BOG first determines what pattern of use constitutes a C&T subsistence use versus another consumptive use and then applies that C&T determination to those seeking to participate in a subsistence hunt.

The BOG has established findings based on the C&T criteria for moose in GMU 13. These findings were applied to the eight Ahtna communities that originally established the Copper Basin CSH, and these 8 communities have been determined to be engaged in community patterns and practices that are consistent with the BOG finding. Based on this determination, the BOG established a community hunt for these eight communities and an area for the CSH that encompasses the territory used by these communities to engage in these C&T hunting practices. The BOG also established a quota for any bull moose and a subsistence moose season that is based on a determination of what is necessary to provide a reasonable opportunity.

Then things fell apart. The BOG made the leap from applying the C&T criteria and reasonable opportunity to the eight villages and creating a CSH based on that determination, to

allowing any other group to join without demonstrating anything except the ability to convince 25 individuals to join in an application. No group has had to go through a process to establish that it is genuinely a community and that it is engaged in a C&T pattern of community subsistence uses. There is nothing about Alaska's constitution or subsistence law that prevents the BOG from requiring every group that wants a community hunt to go through the same process as was required for the eight Ahtna communities that originally established the hunt. Requiring such of every community would simply be equal treatment under the law.

A third option that presents a comprehensive solution, proposed in more detail below, is to amend the CSH regulations such that the BOG would assume exclusive authority for determining if a group meets the criteria for establishing a CSH in an area identified by the group. After amending the regulation, the BOG would affirm the CSH originally established for the eight communities in the Copper basin, and limit the permits that can be issued under the regulation to one permit serving those eight related communities. An opportunity would be provided early in 2017 for other groups to come before the BOG and demonstrate that the group is an established "community" and complies with the standard necessary to show an established pattern of customary and traditional use of the specific area proposed by the group for the community hunt. All groups engaged in a CSH approved by the BOG would be eligible for a 2017 CSH permit. All of the ineffective band aids such as limiting the any bull hunt through issuing locking tags for 1/3 of the households in a CSH group would be eliminated.

This above solution has already been considered and approved by the 2014 BOG Committee on Copper Basin Subsistence Hunting. Another committee is not needed for this approach which addresses the real problems without going to Tier II. This approach can be adopted even in the short time allotted for the special meeting on October 23.

Proposed Actions:

1. **Adopt the proposal generated by the BOG Committee on Copper Basin Subsistence Hunting and approved by the Committee 7-4 requiring direct approval by the BOG for each community that wishes to participate in a CSH**.

Ahtna suggest this procedure for approving each community that wishes to participate in a CSH. Each community would be required to make a proposal to the BOG identifying the community and the area for the proposed CSH. The community would be responsible for demonstrating:

a) that the group is a community as that term is defined by the regulation which includes the criterion that the group has been established as a community for a reasonable period of time and that the subsistence way of life is a central component of the community;

b) that as a whole, the community has patterns and practices of use of an identified area that have been established over a reasonable time, that includes taking, use, and reliance for subsistence purposes upon a wide diversity of fish and game resources in the identified area and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life of the community; and

c) if the community successfully demonstrates the requirements of both a and b, it may also demonstrate the subsistence seasons and bag limits or quota that are necessary to provide it a reasonable opportunity to meet the community's needs.

In 2009, the BOG required Ahtna to demonstrate these elements before establishing the moose and caribou CSH for the eight communities originally found eligible for the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community Harvest Area for moose and caribou. 5 AAC 92.074(d). Therefore, at the October 23 meeting, the BOG should confirm these prior findings, including the 100 any bull quota and extended moose season necessary to provide a reasonable opportunity, and confirm the establishment of a CSH for the eight named communities in the identified area, but amend the regulation to reflect that the Commissioner may only issue CSH permits to the communities the BOG has approved to participate in the CSH.

Proposed amended language*:* 5 AAC 92.072(a) - *The commissioner or the commissioner's designee may, under this section and 5 AAC 92.052, issue community-based subsistence harvest permits and harvest reports for big game species to communities identified by ~~where the~~ Board of Game (board) ~~has established a~~ in the community harvest hunt area established by the board for those communities under (b) of this section and 5 AAC 92.074.* (other parts of the regulation will need conforming amendments clarifying that permits may only be issued to communities approved by the BOG).

If a community demonstrates the required elements, the BOG would not lump that community into the regulations authorizing the CSH for the 8 communities (5 AAC 92.074(d)). Instead, the approved community and area would be a new section in 5 AAC 92.074, and the seasons and bag limits for the approved CSH would be established through separate regulations pursuant to 5 AAC 85.

After making the necessary regulatory amendments and confirming the CSH for the original eight Copper basin communities on October 23, the BOG should schedule a special meeting at which any community that wishes to establish a CSH will have the opportunity to do so pursuant to the amended regulations. This meeting should be scheduled in time to implement CSHs for those who demonstrate the required elements for the 2017 season. Thereafter, communities could make CSH proposal pursuant to regular BOG meeting schedules.

The result would be affirming a CSH for the original eight communities while providing an opportunity to other communities to qualify for a CSH for that community's area of C&T use under the same conditions as required of the Ahtna communities. This proposed process does not violate the equal access provisions.

The BOG should repeal the CSH permit condition requiring locking tag for any bull moose. This requirement is unnecessary if the BOG uses a process through which it must approve each community's proposal to establish a CSH. The permit condition requiring a two year commitment has also proved ineffective but could remain or even be increased to ensure that community households who sign up for the approved CSH are committed. Amending the regulation as proposed would repeal all the CSH permits issued for the 2016 CSH except for the Ahtna community permit, thereby freeing all other communities currently enrolled in the Copper Basin CSH from the two year permit condition, and allowing them to establish their own CSH through the amended regulation.

2. Amend 5 AAC 92.072 to replace "group" with "community" and amend the definition of the term "community."

The BOG needs a clear foundation for making determinations for each community that proposes the establishment of a CSH. "Groups" should not be the focus of the regulation if the intent is to provide for C&T subsistence opportunity for communities established around the common value and practices of living a subsistence way of life?

The regulation should be amended throughout to replace the term "group" with the term "community". The definition of "community" in 5 AAC 99.072(i) (2) should be defined as follows:

a "community" ~~or "group"~~ is a group of people whose relationship has been established over a reasonable period of time and who are linked by a common interest in, and participation in uses of, an area and the plants and fish and wildlife populations in that area, ~~that is consistent with the customary and traditional use pattern of that wildlife population and area as defined by the board~~ to sustain the subsistence way of life of the community.

This amended definition should be adopted in conjunction with amending 5 AAC 99.072(b) as follows:

(b) The board will consider proposals to establish community subsistence hunts and harvest hunt areas during regularly scheduled meetings to consider seasons and bag limits and seasons for affected species in a hunt area. Information considered by the board in evaluating the proposed action will include

(1) a geographic description of the hunt area identified by the community;

(2) the sustainable harvest and current subsistence regulations, and board findings for the big game population(s) to be harvested;

(3) ~~a custom~~ patterns and practices of community-based harvest, use and sharing of the fish, plants and wildlife resources ~~harvested~~ in the hunt area identified by ~~any group~~ the community that have been established over a reasonable period of time and that demonstrate a reliance upon a wide diversity of resources in the area that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life of the community; and

(4) other characteristics of harvest practices in the hunt area, including characteristics of the customary and traditional pattern of use found under 5 AAC 99.010(b) .

These amendments would ensure that a community genuinely exists and that the community is genuinely engaged in a pattern of use for the area identified that is consistent with the BOG's criteria for identifying C&T subsistence uses. 5 AAC 99.010(b). All communities would be held to the same standard. A community could be composed of rural and urban residents. The eight Ahtna communities that originally established the CSH includes all members of the community, urban and rural, native and non-native, so long as they are engaged in the pattern community subsistence use of the hunt area.

3. Eliminate the permit condition that a Tier I Nelchina permit holder is restricted to GMU 13 for moose hunting.

The requirement that Tier I Nelchina caribou hunters may only hunt moose in GMU 13 hurts all subsistence moose hunters who depend on the GMU 13 moose population to meet subsistence needs. The regulation seizes on one aspect of C&T use but fails to address the other important defining criteria identified in joint board regulation 5 AAC 99.010 (b). One of the most important C&T criteria is "a pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life." 5 AAC 99.010(b) (8). Moose and Caribou are not "a wide diversity of fish and game resources. Under the BOG's current regulation, the only difference between subsistence and non-subsistence uses of Nelchina caribou is the willingness to also hunt moose exclusively in GMU 13. This denigrates genuine subsistence uses. The structure of implementing the Tier I Nelchina hunt should not have the effect of diminishing subsistence moose hunting opportunity. The board needs to consider another way to achieve the goal of identifying those hunters who are genuinely engaged in the subsistence pattern of taking and use of the Nelchina herd.

4. Other issues.

a. Any BOG deliberation that impacts Units 11, 12, 13, and 20 needs to be held in the largest nearby hub community.
b. There should be collaboration with the federal managers to extend caribou hunting

seasons.

c. Unit 12 has a hunting season that goes for a few days, takes a break over Labor Day and then resumes. This season does not provide a reasonable opportunity for subsistence.

4. Moose management and the any bull quota.

The 50 inch or 4 brow tine method of managing moose populations in Ahtna's traditional territory is not consistent with providing for subsistence hunting needs and reasonable opportunity, which is defined as a reasonable opportunity for **success** in taking a moose. This form of management results in relatively small harvest opportunity for moose without thee antler restrictions, the middle size moose traditionally targeted by Ahtna hunters. The moose management regime needs to be examined to determine it if it is consistent with subsistence law and policy. ADF&G moose management strategy must be clearly justified and explained on the record in terms of how it is serving to provide reasonable opportunity and a priority for subsistence uses.

It appears that a primary purpose of this system of current moose management in GMU 13 is to control hunting opportunity and harvest to allow for longer sport seasons and more sport hunters. This is in conflict with what is required by the subsistence law. There may be other management reasons for the 50 inch, 4 brow tine system of management that contributes to a healthy and sustainable moose population. If so, this should be put on the record. In any case, the ADF&G system for moose management must incorporate the need to provide for a reasonable opportunity. In other words, it is not enough to simply state that the any bull quota must be minimalized to achieve ADF&G management goals. It must also be demonstrated that the goal of such management is consistent with providing for subsistence opportunity and the subsistence priority.

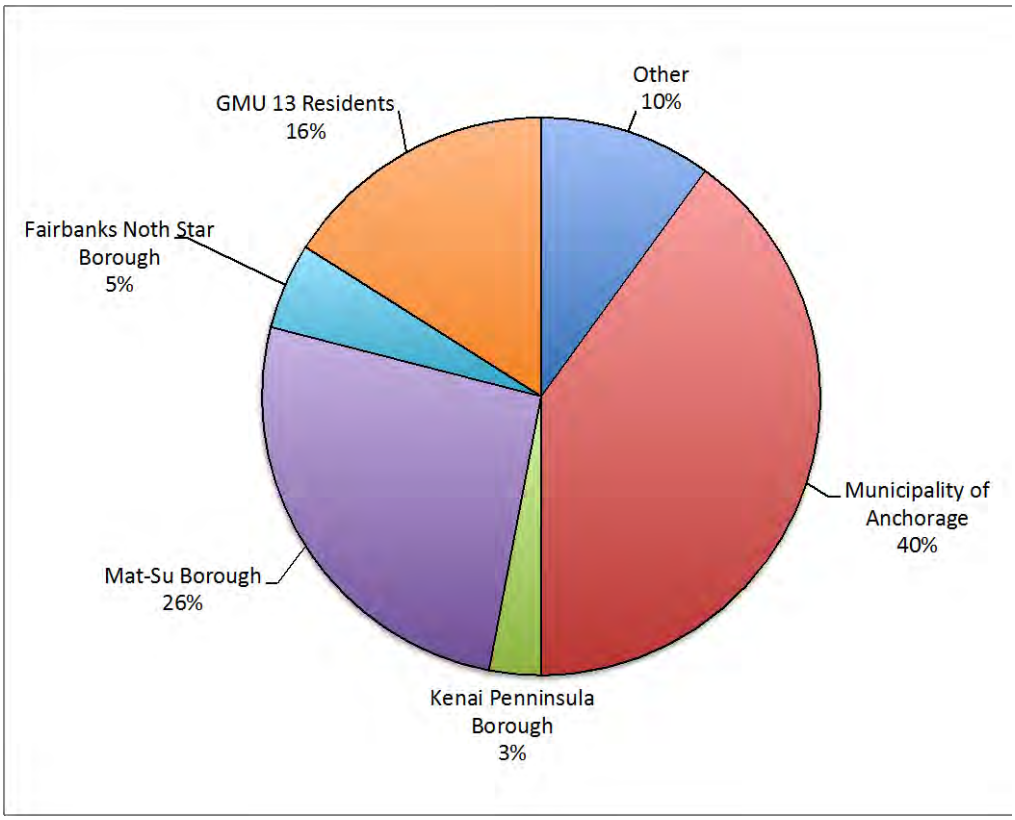
From: Bill Simeone

Date: October 6, 2016

Email: wesimeone2@gmail.com

The following addresses the failure of the State to provide Ahtna communities with a reasonable opportunity to hunt moose in Game Management Unit 13 (GMU 13). Traditional Ahtna territory encompasses all of GMU 13, which is the most heavily hunted GMU in Alaska. People from Fairbanks, Anchorage, the MatSu borough, and Kenai Peninsula, along with GMU 13 residents, hunt the big game resources of GMU 13. The majority of these hunters come from outside of GMU 13 (Figure 1).

Figure 1. Percentage of GMU 13 Moose Hunters by Residence, 1992-2008



Competition is fierce. During the years 1992-2015 an average of 3,469 people hunted moose in GMU 13 every year. An average of 4,402 people hunted caribou each year during the same time period (Table 1).

Table 1. Moose and caribou hunters in GMU 13, 1992-2015

Year	Total Hunters For Moose GMU 13	Successful Moose Harvests		Total Hunters For Caribou GMU 13	Successful Caribou Harvests	
		Residents of GMU 13	Non-Residents of GMU 13		All residents of GMU 13	Non-unit resident
1992	3,216	100	516	6,367	734	3,155
1993	5,809	150	1021	8,040	651	4,419
1994	6,072	120	741	6,645	383	2,915
1995	6,082	164	714	10,553	527	4,157
1996	6,135	161	766	17,600	464	3,814
1997	5,943	143	704	13,070	295	3,570
1998	5,445	140	702	8,146	418	2,478
1999	5,050	154	574	6,612	303	2,103
2000	4,143	107	404	2,470	258	781
2001	3,588	104	324	3,113	367	1,122
2002	3,461	114	458	3,129	351	976
2003	3,362	120	481	2,523	216	786
2004	3,620	109	494	2,819	293	939
2005	3,826	100	469	4,860	408	2,386
2006	4,175	106	579	5,528	373	2,687
2007	3,921	131	519	2,991	255	1,066
2008	4,306	139	601	3,154	254	1,068
2009	4,398	158	692	2,053	273	481
2010	4,398	74	773	4,443	111	1,791
2011	4,220	108	742	3,269	81	1,953
2012	4,935	78	575	6,263	100	3,622
2013	5,239	58	590	6,729	19	2,284
2014	4,774	73	753	4,742	53	2,657
2015	4,899	79	854	5,737	47	3,347
Total	**111,017**	**2,790**	**15,046**	**140,856**	**7,234**	**54,557**
Average	**3,469**	**87**	**470**	**4,402**	**226**	**1,705**

Source: https://secure.wildlife.alaska.gov/index.cfm?adfg=harvest.main
Accessed October 4, 2016

Moose harvest levels for non-residents of GMU 13 averaged 470 animals between the years 1992 and 2015. During the same period, residents of GMU 13 harvested an average of 87 moose per year. Caribou harvest levels for non-residents of GMU 13 averaged 1,705 caribou between the years 1992 and 2015. During the same period, residents of GMU 13 averaged 226 caribou per year (Table 1).

To balance the public's appetite for hunting in GMU 13 with the need to conserve moose populations, maintain sustainable harvests, and give hunters a reasonable opportunity for success, the Board of Game (BOG) and the Alaska Department of Fish and Game (ADF&G) have tried various management strategies

with the goal of "maximizing human harvest." These strategies have resulted in reduced or limited hunting opportunities for the Ahtna and the residents of GMU 13.

Management strategies include varying the length of hunting seasons from as short as 5 days to as long as 30 days and restricting bag limits, including restricting hunters to taking male moose with spike or forked antlers or bulls with 50-inch spread with three brow tines. One of the main purposes for this limitation is to allow "for unlimited hunter participation even following a severe winter when hunting seasons were severely restricted or closed in adjacent areas"(Schwart et al. 1993). This strategy has resulted in increased hunting pressure in GMU 13. For example, the highest number of hunters ever reported in GMU 13 were for the years 1994 through 1997 which, according to the ADF&G area management report, was the result of longer seasons and the spike/fork 50 inch bag limit (Moose Area Management Report 1998: p 114) (see Table 1).

In 1995 the BOG instituted a TIER II hunt for moose issuing 150 permits. In a 2006 the BOG concluded that "virtually since it inception, the Tier II subsistence permit system has been plagued with public complaints about inequities, unfairness and false applications" (Findings for the Alaska Board of Game 2006-170). Problems with the TIER II included the following:

- A majority of the permits went to urban residents.
- Tier II resulted in a lack of opportunity for many young hunters
- Subsistence hunts were not consistent with the 8 criteria described by the Joint Boards.

In 2009 the BOG repealed TIER II hunts in GMU 13, set the Amount Necessary for Subsistence (ANS) for "any moose" at between 300 and 600 animals per year, and established a Community Subsistence Hunt (CSH). By instituting a CSH the BOG intended to increase reasonable opportunities for hunting success by the Ahtna and residents of GMU 13. Under the BOG's original intent CSH hunters were provided the opportunity to take up to 100 any bull moose. This provided reasonable opportunity for success and allowed the Ahtna to follow their tradition of taking any moose presenting itself to the hunter.

However, in 2010 superior court in Kenai determined the CSH violated the equal access provisions of the Alaska Constitution. The superior court decision was appealed

to the Alaska Supreme Court but the appeal was determined to be moot because the Board amended the CSH regulations after the lower court decision. Following this decision the BOG reduced the any bull quota from 100 to 70 animals.

The results of the Board's amended CSH regulation following the superior court decision are reflected in Table 2. As the number of community groups has increased successful moose harvests by the Ahtna Tene group have declined. For example, in 2009 when there were only two groups participating in the CSH, the Ahtna Tene group was able to meet their subsistence needs by harvesting 100 moose (70 any bull and 30 antler legal bulls). In 2013 when 43 groups participated in the CSH hunt, the Ahtna Tene group was not able to meet its subsistence needs and harvested only 30 moose of the allowable harvest. In 2016, with 73 groups participating in the CSH, the Ahtna Tene group was able to harvest only 15 moose (9 any bulls and 6 antler legal bulls). As the number of CSH groups has increased so have the number of any bull moose tags issued by ADF&G. In 2014 there were 281 tags issued compared to 481 in 2016 (Personal communication with Jamie Van Lanin, ADF&G). This has led to increased competition among groups.

Table 2. CM300 Copper Basin Community Subsistence Moose Hunt

		Moose Harvested	
Year	Total Number of CSH Groups	Ahtna Tene Group	All Other Groups
2016	73	15	173
2015	43	36	131
2014	43	33	117
2013	45	28	128
2012	19	37	61
2011	9	56	30
2010	No Hunt	No Hunt	No Hunt
2009	2	100	3

Data includes any-bull harvest and antler legal harvests

In summary: while the BOG has made attempts to increase hunting opportunity for the Ahtna and other residents of GMU 13 its management strategies have led to increased competition and declining harvests for the Ahtna.

Submitted By
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Submitted On
10/13/2016 4:13:35 AM
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As a coordinator of a CSH hunt group unaffiliated to AHTNA for both moose and caribou CSH I support the requests of AHTNA and believe their requests should be respected and prioritized in new regulations. It makes sense for there to exist a generational usage priority on any bull hunts. While my family has been in Alaska four generations that doesn't compare to hundreds of generations of the Athabaskan people who should absolutely have hunting priority over later colonists of the area. Even if this means that no one in my hunt group qualifies for an any bull moose tag. We would still participate in the hunt and be glad that these bulls went to the people who deserve them the most, the Athabaskan people.

As all opinions on this hunt seem to agree that there are too many people trying to get a small number of any bulls, and there needs to be a fair way to limit this opportunity to people who deserve and need them more. Which I know is a difficult and ethically challenging task, but I believe the community hunts regulations was a step in the right direction when you read the eight pages of the hunt conditions especially the customary and traditional use pattern section. There needs to be power in the department of fish and game to enforce what the community hunt regulations has already put into words but not into action. I don't think increasing the one hundred any bull limit will be doing the moose populations any good but that should be up to the biologists and AHTNA elders.

I am completely behind the spirit and principles of the community hunt, it has inspired our group to share & donate more meat, tan more hides, use more of the animal (bones, organs, etc), share/pool more resources to harvest, process, and preserve more wild food. It has given a new sense and priority to community hunting, sharing, and education for our group. I hope the CSH hunts continue even at the loss of the any bull opportunities, especially the caribou hunt. With the Nelchina caribou heard well above its optimal population level due to factors such as lack of predation, and the department is sending out emails requesting hunters target cows, it seems like a they need all the help they can get to manage the nelchina caribou population to a sustainable level. This would include the Caribou Community Subsistence Hunt as a key tool to help keep populations within their goal. The moose hunt seems to be the controversy here, not the caribou. It would seem ill advised to shut down both hunts at the same time since the caribou hunt could still provide the same quality meat for people who depend on it while the moose hunt is resolved. Shutting down both hunts would be a huge detriment to my communities ability to harvest wild game meat that we all use and depend on. I strongly recommend that the community caribou hunt continues.

Thank you very much for you time.

9-27-16

Hi,
MY NAME IS ALBERT FLEURY
I AM A SHAREHOLDER of TAZLINA VILLAGE. MY 2016 CSH HUNT WENT LIKE THIS

1. I DROVE THE GLENN HIWAY FROM EAGLE RIVER TO GLENN ALLEN FOUR DAYS BEFORE CARIBOU SEASON OPENED ON AUG 10th ALL THE PULL OUTS AND GRAVEL PITS WERE FULL WITH HUNTERS, THEY HAD ALL TERAIN VEHICALS of ALL KINDS, CLASS A. MOTORHOMES, CLASS C. MOTORHOMES 5TH WHEEL TRAILERS
THERE JUST WAS NOT ANY WAY TO GET OUT ON THOSE TRAILS
I WOULD SAY THERE WERE CLOSE TO 3 HUNDRED RIGS TOTAL. KUREKA WAS THE WORST.

2. ON OPENING DAY AUG. 10th I DROVE TO DENALI HYWAY FROM PAXSON TO MI. 49 IT WAS THE SAME AS MY DRIVE ON THE GLENN HWY.
PEAPLE BY THE HUNDREDS AT EVERY PULL OUT & GRAVEL PITS
THEY ALL CAMPED OUT FOUR OR FIVE BEFORE THE AUG. 10th OPENING
COULD NOT GET ON TRAILS BECAUSE OF THE AMOUNT of PEOPLE THERE

3. DIFFICULT TO GET CARIBOU OR MOOSE BE CAUSE HUNTERS TAKING UP SPOTS BEFORE SEASON OPENED

4. TO MAKE CSH. HUNT BETTER FISH AND GAME NEEDS RESRICT HUNTERS TO OPENING DAY NO FOUR OR FIVE DAY CAMPING BEFORE HUNT OPENING

5. NO MOOSE THIS YEAR, GOT ONE SMALL COW CARIBOU. SAW 5 WOUNDED COW CARIBOU THE ONE WE GOT WAS WOUNDER SHOT IN HIND LEG

THE STATE IS TO BLAME FOR THIS CSH MESS AHTNA WILL NEVER BE ABLE TO HARVEST THERE MOOSE AND CARIBOU THIS WAY!

WHY ALL THE PAPER WORK THE QUESTIONS FOR THE CSH HUNT THE QUESTION THAT NEEDS TO BE ANSWERED IS WHEN IS THE STATE GOING TO END THIS HARDSHIP ON AHTNA HUNTERS?

THANK YOU.
Albert Fleury

September 30, 2016

Alaska Board of Game
PO Box 115525
Juneau, Alaska 99811-5526

To the Alaska Board of Game:

The Community Subsistence Hunt is not meeting the customary and traditional needs of the tribal members of Tazlina Village Council for moose and caribou.

It is difficult for our tribal members to harvest a moose or caribou because of the high competition due to the State opening it up to the 73 CSH Groups. We cannot also compete with the number of hunters using all-terrain vehicles, most of our tribal members do not own all-terrain vehicles. Our community is an economically depressed village. Many depend on seasonal work for their livelihood, which does not provide for all of the annual household expenses.

Our tribal members depend upon moose and caribou to meet their needs.

We want to have Community Subsistence Hunt be only for the Ahtna Group, like the initial intent of CSH in 2009, and to have a separate CSH hunt for all the other Groups,. All the other Groups must follow the criteria of the community subsistence hunt conditions, and CSH hunt conditions must be enforced by Alaska Department of Fish & Game.

If the community subsistence hunt continues not to meet our subsistence needs, we want to do away with the CSH hunt and re-evaluate subsistence hunt in GMU 11, GMU 12 and GMU 13.

Sincerely,

Betty Lafromboise -

The increasing numbers of city people hunters along with their improved mechanized access, has created competition ... All the additional motorized transport has expanded available hunting areas and reduced bag limits. Fewer animals are available along the highways. I lack the means to complete in the new off road climate, or ever increasing competition from city hunters... I don't have the money to buy gas to hunt and patrol along the highways and long remote areas I am Ahtna Tene Nene resident, faced with dramatic competition from other communities Anchorage, Fairbanks and all the other places with large population of people. I don't have a truck so I can only walk so far in a days walk at the days end And the next day start all over again in a days walk... These off road vechiles scare the animals away as

The Good Lord permitted the animals to be taken by us so that we would give our souls to the Lord so we would be born again.

a Box of 30-30 Bullets use to cost $6.50 a Box, and a rifle was $90.00 one time I would shoot rabbit all winter long for my food and I got rabbits for other people too the people who don't have guns no bullets, no car, no truck, no 4 wheeler, no R.V. no nothing... did you ever eat squirel for your meal or mice Cache food, now thats survival a lot of times we don't have wood in the winter, sleep in the cold no gas, Don't warm up until the sun comes up and then I go hunt for spruce chicken all winter long... the other old people eat what I kill, ther other people who can't Walk or can't do anything, I give them spruce chicken first that way I'll get more wild chicken for me to get in the cold 50° Zero winter... This is what makes us Alaska Natives Indians the Ahtna Athabaskans Tribal people. alot of times I don't have a lot of Bullets, just 2 or 3 Bullets, one for the bear.

each bullet counts, We also pick mushrooms and roots to eat, the Indian potatoe. just enough to make a days meal.... animal Bone soup I make, can last maybe 2 weeks.... when I run out of Bullets I use snares to catch my food, if a fox, Coycote, or raven don't eat it first. one time I was so hungry, I was walking down the highway a long ways out with no body around for miles and miles anyway. I prayed to the Good Lord and I asked Jesus for food and then far away in the long distance I hear a car come it didn't come to close to me but it stopped and put something white on the ground and the golden car drove away I was a mile away and what they put down was a box of food Hamburger french fries, a beverage drink a complete meal I prayed again Thank you Jesus Thank you for the food.

Did you ever eat Blue berries in the Winter, Ki Bush Berries that I find in the Wild Bush, Sometimes we don't know where our next meal is comming from

and the 4 wheeler, 6 wheeler off road vechiles create a mud free way in the land that belongs to the Altna Indians We never agreed to let them come here... I don't go to your place and start shooting up everything in sight... I walk to a lake and an airplanes fires shots from the sky at the moose in the water... The white man has boots too and they kill more moose and caribou, so I keep walking. And then there's the hunters flying all over the place...

the hunters by the numbers so many of them from this civilization, a lot of them are so rich they have a lot of money they don't need the moose meat to eat and live on like me thats all I can get with a bullet thats my food for the long winter thats my food all my life all year long.

living out here in the country, my mother friend had no food so my mother took them out in the woods and my mother built a fire cooked Moose hoffs, Boiled moose hoffs and Coked moose hoffs thats all they had to eat...,

when your hungry no one is your friend, you are so hungry you get weak and tired sometimes I just lay down in the tundra and go to sleep. The land is my dinner table I help the animals live, and the animals help me live. Living on Gods open range. I look and I see there are to many bears and no moose, what a poor world to many wolves and no moose and so once again there would be no fresh meat, once again no food, and once again people like me would be hungry... When the first white men came here they were starving and the Ahtna Indians gave them Moose stew to eat the whole army... and then they for got about that and took the land. and made fish and game laws.

Bob Neely -

Native Village of Cantwell

PO BOX 94 CANTWELL, AK 99729 (907) 768-2591 (FAX) 768-1111

October 5, 2016

Alaska Board of Game
P.O. Box 115525
Juneau, AK 99811-5526

RE: 2016 Community Subsistence Hunt for moose and caribou

Dear Alaska Board of Game:

The 2016 Community Subsistence Hunt for moose and caribou has been very difficult for Cantwell residents. The amount of people traveling to Cantwell to hunt has dramatically risen. Many of our local hunters were not able to hunt or harvest in the areas they hunted for many years due to the increase of hunters coming from Anchorage, Wasilla and Fairbanks.

To make the Community Subsistence Hunt better Cantwell residents suggested hunters should hunt in **THEIR COMMUNITY**. This hunt is called the **COMMUNITY** Subsistence Hunt, so hunters should be hunting in the community that they reside in.

Thank you for your time on this important matter. If you have any questions please feel free to contact me.

Sincerely,

Rene Nicklie

Rene Nicklie, President
Native Village of Cantwell
hallvc@mtaonline.net

October 5, 2016

Alaska Board of Game
P.O. Box 115525
Juneau, AK 99811-5526

To the Alaska Board of Game:

I was not able to go moose hunting this year because of family conflicts and obligations. I will be going caribou hunting in October. I have heard many complaints from other CSH hunters about the high competition because of the state opening up 73 CSH groups. Also, it is difficult to compete with hunters using all terrain vehicles.

Sincerely,

Cleverdon Mugford

GAKONA VILLAGE COUNCIL

October 6, 2016

Alaska Board of Game
P.O. Box 115525
Juneau, AK 99811-5526

To the Alaska Board of Game:

The Community Subsistence Hunt (CSH) is not meeting the customary & traditional needs of moose & caribou, for our members in Gakona Village. Our tribal members depend on moose & caribou to feed their families. This year, Gakona was issued 3 locking tags and no members were able to harvest a moose.

We cannot compete with the extremely high number of hunters since the State opened it up to 73 Community Subsistence Hunt groups. These thousands of hunters have the means to purchase expensive off road vehicles. Not only do these all terrain vehicles tear up the land but it also disrupts the habitat and forces the game to move farther back. For those of us who hunt on foot it makes it very difficult to carry out our moose for these expansive distances.

Furthermore, all the CSH groups must follow the criteria of the subsistence hunt conditions like we do here in the Ahtna Group. The initial intent of this hunt has been forgotten and enforcement by the Alaska Department of Fish & Game is missing.

I would hate to see hunting become a "rich man's sport." This would devastate the culture of our local Native peoples and lower income families who enjoy the hunt as well as the health benefits of eating natural foods.

We strongly support the need to re-evaluate the subsistence hunt in GMU 11, GMU 12 & GM 13.

Sincerely,

Charlene Nollner
Tribal Administrator

Native Village of Gakona - PO Box 102 Gakona, AK 99586
Phone (907) 822-5777 - Fax (907) 822-5997 – www.nvgakona.com

Wrangell-St. Elias National Park
Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 12, 2016

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526
Via: dfg.bog.comments@alaska.gov

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 11 and 12, 2016. At this meeting, the SRC discussed the requests from *Ahtna Tene Nene'* regarding the Copper Basin Community Subsistence Hunt, part of which occurs within Wrangell-St. Elias National Preserve. We would like to provide the following comment for consideration at your special meeting on October 23, 2016:

The SRC supports the original intent of the community hunt, as proposed by Ahtna in 2008 and implemented in 2009. In its current form, however, the hunt is not working. The Commission supports the recommendations of Ahtna, Inc., and the Copper Basin Advisory Committee to cancel the Copper Basin Community Subsistence Hunt effective 2017. We also support the request that the Board of Game or a working group of the board hold a meeting with stakeholders in the Copper Basin, which is the most affected area, in November or December 2016, to discuss alternatives to this hunt.

Thank you for the opportunity to comment.

Sincerely,

Karen Linnell
Chair

cc: NPS Alaska Regional Director
Superintendent, Wrangell-St. Elias National Park and Preserve
Governor of Alaska

October 5, 2016

Alaska Board of Game
PO Box 115525
Juneau, Alaska 99811-5526

To the Alaska Board of Game:

The Community Subsistence Hunt is not meeting the customary and traditional needs of the tribal members of Gulkana Village Council for moose and caribou.

It is difficult for our tribal members to harvest a moose or caribou because of the high competition due to the State opening it up to the 73 CSH Groups. We cannot also compete with the number of hunters using all-terrain vehicles, most of our tribal members do not own all-terrain vehicles. Our community is an economically depressed village. Many depend on seasonal work for their livelihood, which does not provide for all of the annual household expenses.

Our tribal members depend upon moose and caribou to meet their needs.

We want to have Community Subsistence Hunt be only for the Ahtna Group, like the initial intent of CSH in 2009, and to have a separate CSH hunt for all the other Groups,. All the other Groups must follow the criteria of the community subsistence hunt conditions, and CSH hunt conditions must be enforced by Alaska Department of Fish & Game.

If the community subsistence hunt continues not to meet our subsistence needs, we want to do away with the CSH hunt and re-evaluate subsistence hunt in GMU 11, GMU 12 and GMU 13.

Sincerely,

Ralph P. Kosbruk II
Dale Phillips

The hunt this year seemed to start out stress full just like any other year. Worried about if I have taken enough time off? Or should I take the beginning of the hunt off or wait till the closer to the end to start hunting. My family and I took Aug 10th through Aug 26 off. Only to find out Moose hunting doesn't open till Aug 20th. Which only gave us a week to hunt for Moose? So we did a lot of Blueberry picking and looked for Caribou the first week. Missed two nice Caribou that week.

- Write about the conditions of the hunt, whether it was difficult to harvest a moose or caribou.

No not too hard this year for our Moose. He was a young spike/fork that had been hanging around close to the Village. (300 yards from my back porch).weather pouring rain

The Caribou where on a hillside when I spotted them hoping that they would change direction and start coming down. They didn't before I could get within shooting range they both walked over the hill. (So sad)

- Write why it was difficult to harvest a moose or caribou, was it because of crowded conditions, bad weather, etc., lack of access to off road hunting.

Not at all this year or any year so far Thank GOD .My family and I have been blessed a few years now with a Moose. Haven't gotten a caribou in years, can't remember how long now. We manage with what we do get Salmon, Blueberries/Raspberries and a Moose.

- Write why you did not get a chance to hunt this year, for example, too many hunters?

I hunt every year with and around other hunters. It's the time off from work that always seems to be problem. If I could I would take Aug 10th through Sept 20th off. It would be idea...Can't wait to retire so I can move back home to live and hunt year around.

- How would you make this CSH hunt better?

Get more VPSO /Land Officers to manage our hunting lands and not have porches taking our game before we get a chance to hunt them ourselves.

Lingo Nichlie
10/6/2016

October 10, 2016

Alaska Board of Game
PO Box 115525
Juneau, Alaska 99811-5526

To the Alaska Board of Game:

I appreciate the Community Subsistence Hunt for any bull moose, and appreciated the extended time for caribou this year. My husband and I hunted but the animals were at higher elevations, our people traditionally know to hunt in Sept/Oct when it's a bit colder.

We notice the non-Native group with rigs, 4-wheelers and boats, which we don't traditionally use, so I wonder if it would be better for the non-Native Group to hunt during (Aug/Sept) since they have the equipment to go to higher elevations and allow the Ahtna group to hunt (Sept/Oct) when the animals move closer to the highway.

We see there is wasted meat as we notice only moose heads coming out on rigs and caribou heads coming out of Lake Louise in boat and trailer from Anchorage Non-Native Group. It would be nice to have drop station with a horse trailer or vented box truck to hang unwanted meat with paperwork to donate/or share with Ahtna elders from the Anchorage trophy hunters.

It would also be helpful if the villages would require Locking Tags be returned 2-3 days, so others have equal opportunity to hunt and possibly reserve a couple Locking Tags for elders. It would also be nice to allow family members to hunt with elders as we traditionally went out as families and assist elders with the harvest and shared the meat. My husband and I are elders but we hunted for both moose and caribou but we realized it would have been a burden to haul it in.

I also noticed a lot of tissue in the bushes and see a lot of Anchorage hunters on the road, some porta potty and dumpsters would be nice during hunt too.

Again, we appreciate the Community Subsistence Hunt and want to thank the Board of Game for this opportunity to hunt and share traditionally.

Sincerely,

Marilyn E. Joe
P.O. Box 267
Copper Center, Alaska 99573

September 27, 2016

To Whom It May Concern,

My son hunted with tag 37 and he did get a moose in unit 13. The weather was great there was nothing that was too difficult about the hunt other than it was a controlled use area so we had to be very careful concerning our vehicle and so on. In other areas it was difficult just not knowing exactly who's land we were on. Was it state? Ahtna? Chitina Corporation? Was a land permit needed? But having the tag for an any bull makes it easier on my son to learn to hunt and provide meat for the household and community.

I hunted with tag 36 in Unit 11. That was fine we just found a trail and walked it and came upon a moose. It was very brushy which helped the moose! But the next day we were able to find him again and get him. As this area was not a controlled use area, it was easier to bring the moose out using a 4 wheeler. But this moose I gave all away to the elders. So it went to 5 households. Which was nice to be able to do.

My complaint is just that there are not enough tags. Yes, if one gets a moose and we give some to our community that is great. But it may not be enough to get them thru the winter if they have a large household. So when these two tags were used, that left the other 3 or 4 households from here with no moose of their own. But we shared both of our moose with these households.

I don't know if there is a better way to divide up the tags. I know that there is people from Anchorage that applied and they didn't get the use of the tag. Now did they get a legal bull I don't know, but since they didn't come out and get the tag, they didn't get the chance for an any bull.

But overall my son very much enjoyed the chance to hunt and learn how to skin and process the meat that we were given. So thank you for having the Community Hunt available!

Thank you,

Precious Billum

September 30, 2016

Alaska Board of Game
PO Box 115525
Juneau, Alaska 99811-5526

To the Alaska Board of Game:

The Community Subsistence Hunt is not meeting the customary and traditional needs of the tribal members of Tazlina Village Council for moose and caribou.

It is difficult for our tribal members to harvest a moose or caribou because of the high competition due to the State opening it up to the 73 CSH Groups. We cannot also compete with the number of hunters using all-terrain vehicles, most of our tribal members do not own all-terrain vehicles. Our community is an economically depressed village. Many depend on seasonal work for their livelihood, which does not provide for all of the annual household expenses.

Our tribal members depend upon moose and caribou to meet their needs.

We want to have Community Subsistence Hunt be only for the Ahtna Group, like the initial intent of CSH in 2009, and to have a separate CSH hunt for all the other Groups,. All the other Groups must follow the criteria of the community subsistence hunt conditions, and CSH hunt conditions must be enforced by Alaska Department of Fish & Game.

If the community subsistence hunt continues not to meet our subsistence needs, we want to do away with the CSH hunt and re-evaluate subsistence hunt in GMU 11, GMU 12 and GMU 13.

Sincerely,

Gloria McRwan

Rebecca Hoon

Dorothy Shein

Timothy J. Peter

Linda Goodlad

Submitted By
Martha tansy
Submitted On
10/13/2016 4:59:11 PM
Affiliation

I participated in the Community Harvest program for Unit 13 for moose and Caribou this year and I agree that the 100 any bull tag limit should be increased and the time allotted to harvest to increase also to allow more groups to harvest animals before reaching the quota or giving each group 1 any bull moose locking tag and not having a quota

RECEIVED
SEP 30 2016
BOARDS
ANCHORAGE

Fish and Game Board
Subject: Unit 13
Friday, September 30, 2016

I have fished and hunted in Alaska since 1952 when I was ten years old. Now I am 74 years old.

This past month my friend and I hunted Unit 13B for five days around Clearwater Creek without any luck.

In past years I have seen as many as 25 to 30 moose a day in this area, this trip we saw only one cow and calf.

We saw no caribou while we hunted the east side of the Susitna River but on Sept. 26 and 27 a friend saw hundreds on the west side. I'm not worried about the caribou in Unit 13.

I am convinced that the community hunts, CM 300 hunts, tier I and tier II hunts have depleted the Bull Moose in this area.

I do have great respect for all the work that the fish and game board has put in, trying to accommodate all the hunters in the State.

Solution: Stop CM300 early August 20th hunt! Stop Unit 13 caribou permits requiring moose to be hunted in only that area as well. Stop DM 325 and DM 324 permits. Stop "Any Bull Moose" hunts in Unit 13, only have spike fork or 50 inch with four or more brow tines. Another solution, Registration hunts only.

In five days we saw only one spike fork taken.

Darrell Hill Darrell Hill

Submitted By
Eric
Submitted On
9/26/2016 12:11:59 PM
Affiliation

Unit 13 community subsistence is a joke when guys from Eagle River, Anchorage and the Mat-Su Valley can form a "community" pretending like they're subsistence hunters. I strongly agree with the Ahtna proposal. Ahtna should receive the lions share of the any bull moose allocation. Vetting folks through the Tier II qualification should help limit some of the abuse from these would be subsistence hunters living in our largest cities. Anyone not qualified for Tier II should be required to adhere to the current 50 inch, 4 brow tine, spike/fork limitations with the exception of those allocated to draw permits.

Surely you all must be aware of the "community" abuse that occurs.

The abuse of what a community was meant to be is sickening to me. Some hunters use permits from households that are not able to hunt rather than acting as a designated hunter. These left over permits are used to fill freezers of the other hunters in the "community" with the other households meat.

My wife and I personally witnessed what we would equate to as combat hunting (much like combat fishing) on the Denali highway this year. The number of hunters is out of control both along the Denali and near Eureka on the Glenn.

Given the number of hunters I would actually propose moving to a drawing moose hunt in unit 13 for those who are not Tier II qualified and adding to the current number of draw any bull tags issued. I believe 5 were allocated to DM324. Draw permits could be allocated much as they are for nonresident moose hunters in the unit 13 sub-units with a significantly higher allocation for resident hunters.

As for the caribou in that unit I would propose limiting the number of hunters who are not Tier II qualified to a drawing only. Eliminate Tier I. If sufficient caribou exist then why can't the harvest of 2 animals per permit be allowed for both CSH and the draw with the initial excess allocation going to true CSH members? I would certainly rather see that than flooding both highway access points with even more hunters as was done in 2016. There were times especially on the Labor Day weekend and the following weekends where it was nearly impossible to hunt.

Extension of both moose and caribou seasons to the 25th should be extended to all hunters except the non-resident draw.

Submitted By
Rebecca Schwanke
Submitted On
10/5/2016 10:36:58 AM
Affiliation

Phone
9078223421
Email
becky99588@yahoo.com
Address
PO Box 612
Glennallen, Alaska 99588

Dear members of the Board, For the past several years, participation in the CSH has grown. The number of participants is now excessive and because of this, the requirements of the hunt now generally equate to that of a general hunt for moose and caribou. These hunts are not working out the way the proposal writers originally intended. They are instead bringing new hunters to the area. The extended moose season and effective proxy hunting opportunity the CSH offers is already too great for people to pass up. Extending the moose season into the rut would further increase participation and harvest significantly and likely pushing bull ratios too low in many areas. Extending the caribou season would lead to hunting along the Richardson Hwy when caribou are crossing in typical years. Wounding loss would be excessive. A special meeting is not the time to effect change. So many are affected by the CSH and Tier I regulations in Unit 13, the only reasonable action to take at this time is to recognize the disaster Unit 13 has become. The Board should seriously consider scrapping the CSH in 2017 and crafting structured Registration hunts that will be reasonable and effective for hunters and the biology of the NCH and moose of Unit 13. Thank you for time, Becky

Alaska Department of Fish and Game:

September, 2016

Dear Directors and Staff:

I am a longtime Alaska resident and am 73 years old. I have hunted Unit 13, Clearwater Creek area for many years. This year, 2016, the area was like a "Dead Zone", meaning few to no moose to hunt. I felt like I was witnessing a crash of the bull moose population.

The community hunts meant many bulls of any size were removed before regular season. The thousands of extra Caribou permits probably brought many more moose tags as well. It was a perfect storm.

Please consider the following emergency interventions to spread out the hunters:

1. Allow moose hunters with Caribou permits to hunt outside Unit 13.
2. Have Caribou hunters register in person (not online) at any ADFG office anytime before hunting.
3. Allow 2 caribou per permit for more harvest + fewer hunters.
4. Allow seniors and disabled to hunt during the community hunt time frame
5. Disallow community hunts in the Clearwater Creek drainage. Allow more CH permits in less accessible areas or get rid of the CH program altogether. More than ample opportunity for subsistence exists in tier II, CM 300, Proxys, and Federal programs.
6. Give the area a mid season rest to recharge (ex: close hunting the last week of August).
7. Safety/ethics course required for caribou/moose hunters in high volume areas to reinforce a common code of conduct for a diversity of hunters.

Thank you for your attention to this urgent matter.

Roger K. Mueller Ph.D.

Submitted By
sam hall
Submitted On
10/5/2016 1:08:31 PM
Affiliation

We, as owners of property in Unit 13A (john lake) for 21 years. Have concerns with the community hunt in Unit 13a and would like to see it stopped, even have a draw for moose for a few years to bring back a moose population. We have two community hunts back by john lake and the area just cant handle this. A decline on the caribou population due to over hunting and community hunts We've seen a decline in the total moose population since the onsite of community hunts . The rule if you get a Tier ll caribout tag you have to hunt moose in this area also. In general, its been over hunted and lack of wildlife.

Submitted By
Bjørn Olson
Submitted On
10/12/2016 11:42:47 AM
Affiliation

Phone
9077561920
Email
fatbikebjorn@gmail.com
Address
PO Box 237
Homer, Alaska 99603

To whom it may concern,

I would like to add my two-cents to the conversation surrounding the Copper River Community Subsistence hunt. I agree that this is a tricky issue with no obvious solutions; however, I strongly support 'Control Use Areas', e.g. non-motorized hunting.

Means and methods of our hunting practices will have to be addressed before too long. Climate change will undoubtedly make Alaska more and more attractive over the coming decades. A growing population will place an ever increasing demand on our natural resources, which, whether you like it or not, belong equally to all residents. The simple solution is to level the playing field and remove motorized vehicles from the picture.

My position is this: motors detract from the hunters experience, increase the carbon footprint of the hunt, do harm to the tundra, trails, etc., they unfairly advantage the wealthy, and the game is under more pressure and stress. I believe that intensive predator control would become less and less important over the decades, too, if more hunts were human-powered.

On a side note, I have been lately learning about the hunting practices of caribou and muskox in Greenland, which is all done under human-power. The caribou, I hear, have much more fat on them because they are not chased as much.

Thank you for hearing my comment.

Bjørn Olson

PO Box 237

Homer, AK 99603

fatbikebjorn@gmail.com

(907)-756-1920

Submitted By
Randall L Holt
Submitted On
10/12/2016 12:01:21 PM
Affiliation

Phone
907 357-5077
Email
rdy2retr@mtaonline.net
Address
2081 S Fleet St.
Wasilla, Alaska 99654

Dear Board Members,

In regards to the CSH moose hunt,

I would like to make a propsal that you change the starting date back to the original starting date of Aug.10 to coinside with the starting date of caribou hunt. A later starting date was tried and it failed. I'm sure there are other options like closing moose hunting an area , or even a section of an area that has been over harvested numerous years in a row to protect the moose population. Possibly have this hunt like the Kodiak brown bear tags, if you're successful in your harvest of a animal in one year you're not able to hunt for that species the following year. Options are out there, we just work on a solution to make this hunt a success.

Thank You for your time and concideration of this matter.

Randall L Holt

Group Coordinator for the CSH

Submitted By
Rod Arno
Submitted On
10/13/2016 2:42:51 PM
Affiliation
Alaska Outdoor Council

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AOC comments on BOG Proposal 154, BOG October 23rd meeting

The Alaska Outdoor Council recommends the Board of Game repeal 5 AAC 92.074(d). The current community subsistence harvest regulations do not meet the intent of the Alaska Board of Game; #2006-170-BOG, 2011-184-BOG, 2015-209-BOG.

The Gulkana, Cantwell, Chistochna, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah Community Area (Copper Basin) for moose and caribou was adopted to provide a harvest allocation of 70 any bull moose and 300 caribou to meet the needs of the 8 Ahtna communities that established the Community Subsistence Hunt (CSH), not to all rural residents of the Copper Basin. The Alaska Superior Court found that regulation unconstitutional, an Alaskan native priority to public resources (wildgame) clearly violates the Common Use (AK State Constitution Article 8, Section 3) clause.
Although not included in the department's interpretation of what was being asked for in the special request submitted by Ahtna Tene Nene' it's clear they are asking that the CSH harvest quote of any bull that was established to meet the needs of the 8 Athna communities be allocated to them. The board tried that in 2008 and it was determined to be unconstitutional.

At the current Tier 1+ level of harvest for both moose and caribou in the Copper Basin Community Subsistence area the board has the opportunity and latitude to determine a reasonable opportunity for subsistence needs is being met from both state and federal hunts in the area. Under the state subsistence law the board may at the Tier 1+ level vote to increase bag limits and seasons under state General hunts for either moose or caribou as the harvestable surplus allows, consistent with the sustained-yield clause inshrined in Article 8, Section 4 of the Alaska State Constitution.

Under the current Copper Basin CSH regulations no hunters are being treated respectively. Increasing moose and caribou harvest opportunity under the CSH regime will only acerbate just what the author's of the request, made into Proposal #154 by the department, are trying to get relief from, more users.

Submitted By
Alan Smith
Submitted On
10/13/2016 4:57:08 PM
Affiliation
Alan Smith

Dear Board of Game,

I am OPPOSED to part of the proposal to restrict both CSH hunts of moose and caribou.

Wood heat will warm you twice: once when you split the wood, and again when you burn it.

In my experience, Unit 13 Caribou CSH is similar fuel for the community. Caribou is the wood, and the hundreds of hours in preparation, hunting, harvesting, processing meat and hides, learning and sharing skills, and sharing sustenance with non-hunters is the warm fire around which our community gathers.

I've participated in the Caribou CSH hunt since 2014, always non-motorized. It connects me to the land and the wildlife. It brings our community together. I learned how to make and enjoy liverwurst.

I support preference for AHTNA in the bull moose hunt. They've been doing it a long long time.

I support preference for subsistence hunting that is non-motorized. This will naturally limit harvest.

I support no other changes to current Unit 13 Caribou CSH regulations except enforcement of current regulations. It's a lot of work to follow all the rules. This will naturally limit harvest as well.

If bull moose distribution is the problem, please focus on that, not conflate it with the Caribou hunt.

Good luck! This seems like a challenging issue to sort out.

Submitted By
Brian MacDonald
Submitted On
10/13/2016 11:13:49 AM
Affiliation
Resident

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The whole meaning behind the community harvest has been lost and is being abused. With the amount of participants and there ability to take sub legal and legal bulls prior to the general season puts all of the hunters who are not abusing this program at a disadvantage. I'm concerned that it will ultimately affect the general season because of the potential ability to take so many animals prior to the general season. I understand the subsistence need but this is so wrong, we ran into individuals bragging about how many animals they could take as well as individuals that said they had never hunted in unit 13 but started because now they don't have to worry about judging size. I've hunted in unit 13 for over 40 years and have never seen the volume of hunters that we encountered this season. People driving a 40 foot motor home with a trailer and 30-40k in hunting vehicles don't in my opinion meet the definition of subsistence. I'm not sure what the lng term answer is but at this point something must be done to stop the flood of people abusing this program. Maybe it should be aligned with the general season and restrict the community harvest to either side of the road similar to the Dalton highway caribou hunt. Please take action to resolve this abuse. Thank you.

Submitted By
brian wakefield
Submitted On
10/13/2016 11:14:37 AM
Affiliation
1962

Subject: CSH Hunts

As a liflong Alaskan (54) whom has hunted 13 forever, and am all too familiar with the regulatory challenges and changes over the years, the one common thing we should all agree on is getting rid on the CSH, especially for moose. It defies all previous management logic that the sub-50" bulls can be taken by one group resulting in a rippple efffect on any given locale relative to heard health. For example, the Butte Cr / Susitna R trail, the chance of even seeing a 50" + is now unlikely. To call this whole thing unfair is an understatement and at some point the rest of us will start playing the game and then what? The resource should be priority one and CSH completetly usurps it.

Submitted By
Gary Pauly
Submitted On
10/13/2016 12:50:54 PM
Affiliation

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In regards to the unit 13 Copper Basin community moose harvest(subsistance) I do not believe that this is a sound management practice. I feel it is subject to abuse by a chosen few, unsustainable, and not fair to everyone else who has to hunt for moose with 50", four brow tine, or spike-fork racks. Thank you. Gary Pauly, Valdez

Submitted By
Kenneth
Submitted On
10/11/2016 8:39:43 PM
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COMMENTS AGAINST AHTNA EMERGENCY PROPOSAL No. 154,
Oct. 23, 2016 BOG Emergency Meeting

1. Lack of Commissioner and BOG statutory and regulatory authority:
The Commissioner and BOG have exceeded all statutory authority to call an emergency BOG meeting to increase the Ahtna community subsistence harvest permit (CSP) season and bag limit for ONE private party (Ahtna). The alleged authority is erroneously stated as AS 16l.05.130 which deals with monetary proceeds.
There is no emergency Commissioner or BOG statutory or regulatory authority to increase one privatge party - Ahtna's CSP hunting season and bag limits.

2. VIOLATION OF REQUIRED PUBLIC NOTICE AND OPPORTUNITY FOR PUBLIC INPUT AT PUBLIC HEARING
The ADF&G Emergency Public Notice stated intent to change the 5 AAC 85.045(A()-(11) bag limits (moose) and 5 AAC 85.025(a)(8) (caribou), without further notice and without full public hearing and opportunity for public comments (no public hearing comments are allowed), violates the 5 AAC 85.045 et seq., and 5 AAC 85.025 et seq., and the Alaska Administrative Procedures Act, AS 44.62.020 et seq., (*Kelly v. Zamarello*, 486 P2d 906 (Alaska 1971).

COMMENTS:
You can thank [redacted] for the over crowed caribou and moose hunters in GMU 13. And [redacted] for excessive Tier-1 community subsistence harvest permits (CSP) and unlimited Tier-1 and draw permits, and for Ahtna's alleged inability to get enough caribou and moose for their traditional subsistence needs.
In 2009, Ahtna, [redacted] coerced the BOG to pass Ahtna proposal no. 84 for community harvest permit (CHP) "for Ahtna tribal members only." [now called community subsistence permit (CSP)]. BOG Chair Ted Spraker stated on the record: "he favors granting Ahtna a hunting priority preference." (BOG Record March 2009). The court in *Manning, AFWCF, v. ADF&G, Ahtna*, 3KN-09-178Ci, (2011 decision) Judge Bauman held the CHP was an unconstitutional residency based permit because it required residency in one of the eight Ahtna villages. And he struck down the ADFG "experiment" that re-classified 12,000 long-time Tier-II hunters, as "not real subsistence hunters like Ahtna" (BOG Record March 2009). [redacted] the BOG to re-pass the same CHP with "ADF&G experiment," and eliminating the Ahtna village residency requirement along with the 12,000 long-time Tier-11 subsistence hunters. [redacted] And re-passed the Ahtna CHP and struck down experiment to re-pass the Ahtna priority-preference CSP hunting permit..
This again eliminated 12,000 long-time Tier-II subsistence users (ADFG "experiment"), to only a couple hundred Ahtna subsistence hunters plus a dozen or so more. This meant the total annual caribou harvest amount necessary for subsistence use (ANS) was less than the total allowable seasonal harvest quota, so bingo! They were out of Tier-II, and could put Ahtna conditions on the Tier-I level hunts. The Alaska Supreme Court in *Payton* held the state cannot put "conditions" on a Tier-II level subsistence hunt. So in court in *Manning II* and *Manning III*, Ahtna fought against Tier-11 (the highest state statute level of subsistence protection, AS 16.05.258(b)), that's why the BOG passed Ahtna Proposal No. 84 – to include Ahtna only conditions. To date, the CSP requires all CSP applicants to comply or "convert" to Ahtna racial customs and traditions, under penalty of $10,000 fine and one year in jail for non-compliance.
Ahtna fought for years in court to get rid of, and stop the Tier-II level hunts because the Alaska Supreme court ruled the ADF&G cannot put "conditions" on a Tier-II level subsistence permit (like Ahtna residency or tribal members only, and to require all CSP applicants in all groups to "convert" to Ahtna culture and traditions (C&T) of salvage guts –stomach, intestines, and require Ahtna communal pot latch, etc), like all in the currecnt GMU 13 caribou and moose CSP hunts, and under penalty of $10,000 fine and one year in jail for failure to "convert" to Ahtna C&T. (See ADFG required CSP Annual Application Certification Statement).
In order to put Ahtna conditions on a community subsistence harvest permit (CSP), the BOG had to politically attempt to reduce the number of subsistence users to get out of Tier-11 and into Tier-I level hunts. Because the entire Nelchina caribou and moose harvest quota is no longer needed entirely for subsistence use (ANS), the ADFG can issue conditional priority preference Ahtna CSPs, as well as unlimited number or draw and Tier-I permits, and close the hunt by emergency order when the allowable annual harvest is achieved. Now, with 73 CSP groups, and unlimited Tier-I and draw permits, Ahtna wants (for Ahtna only CSP) a special priority use of game resource use of increased hunting season and bag limit for Ahtna ONLY, and to go back to Tier-II for the Ahtna CSH only. This blatantly violates Alaska Constitution Article VIII Section 3 "common use" which clearly prohibits any special use benefits of Alaska fish and game resources (*McDowell v. State*, 785 P.2d 1 (Alaska 1989), and Alaska Native Claims Settlement Act Section 804, which eliminated all future claims for aboriginal racial preference priority for fish, game, and waters of the State.
Under the old Tier-II individual permit system, where all annual harvest went to subsistence uses only, the Tier-II point scoring limited

the number of Tier-II caribou and moose permits to the annual harvest quota, and ONLY 2,500 caribou permits were issued, and only Tier-11 qualified limits for moose.

The ironic part is the pre-2009 ADFG CSP regulations previously allowed Ahtna to voluntarily pool its individual Tier-II subsistence permits into a community harvest (subsistence permit), but Ahtna's [redacted] racial priority preference permit conditions, has back fired and over crowed the CSP applications for permits, and by all the unlimited Tier-I and draw permits. ADFG presently issues 15,000 to 20,000 caribou permits for an allowable annual harvest of approximately only 2,500 Nelchina caribou, and unlimited moose permits. Common sense would tell anyone that there would be over crowded hunters for both caribou and moose in GMU 13 Nelchina basin.

In 2009, The BOG also imposed the requirements that the Board called "uglies" (to discourage applicants for Unit 13 caribou and moose permits), in that any one who applied for any Unit 13 permit caribou permit (and everyone in their entire household), must hunt moose only in Unit 13, which forced 15,000 -20,000 more moose hunters onto Unit 13, also causing more over crowed hunters.

Ahtna sent several tribal members and an Attorny to every BOG meeting to coerce the BOG to pass Ahtna's racial priority preference permits. Former Ahtna CEO Ken Johns stated on the BOG record March 2009: "Ahtna spent one million dollars"[to get their community subsistence permit passed].

[redacted] Ahtna's demands for [redacted] priority preference CSP Ahtna-only hunting preferences, has back fired in their face. Now they want an unlawfull increased season and bag limits for ONLY Ahtna CSP hunting priority preferences.

The fact and law remains, the best and highest level of subsistence protection and preference is the Alaska Subsistence Law AS 16.05.258(b) for Tier-11 level subsistence hunts, and for pooling individual Tier-II subsistence permits into a CSP, where there is not enough resource for all hunters to have a reasonable opportunity at success, and especially where there is insufficient opportunity for subsistence needs as Ahtna now claims.

Respectfully submitted:
Kenneth Manning,

P.S: 52 years of subsistence hunting & fishing, and 16 years in Alaska courts fighting to protect lawful equal "common use" use of fish & game resources.

Submitted By
David Young
Submitted On
10/12/2016 8:16:03 PM
Affiliation

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This is in opposition to proposal 154. There should be no action to the current regulations. They are equal for all. This would exclude many Alaskans. As it currently is everyone has an equal fair chance to hunt.

I am also oppopsed to the way this was automatically turned into a proposal from a letter. There is no data to show who did this and it is very short notice. It is also bad form to have this as a teleconference. There are many things wrong with this and no action should be taken - Oppose.

Submitted By
Kathleen Cole
Submitted On
10/12/2016 8:48:04 PM
Affiliation

I oppose proposal 154.

Submitted By
Robert Cole
Submitted On
10/12/2016 9:28:19 PM
Affiliation

I oppose proposal 154. Many Alaskans rely on the subsistence hunts in units 11, 12, and 13 for food.

Submitted By
Jody Nolan
Submitted On
10/13/2016 9:05:38 AM
Affiliation

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After many years of putting in for the Unit 13 caribou hunt, my name was drawn for the 2016 season. Previously, I had accompanied my son and his wife on their first and only hunt in this drawing a couple of years ago. We chose to hunt the Denali Road area. This year was so different, the number of hunters was beyond belief. Trucks, campers, trailers, RV's, SUV's, dirt bike style motorcycles and even semi's with flatbed trailers parked all over the road, every pullout and even quite a way into trailheads that were closed to motorized use. My first thought was, who are these people that drive their rig into trails that are nonmotorized? Second, since it makes all of us hunters look bad, who enforces the rules? The biggest issue to me was the number of hunters. I feel that hunting should be an equal opportunity thing, but this was beyond crazy**. Why no one was shot, I have no idea.** Due to my husbands work schedule we only had weekends to hunt, opening weekend was so bad (congested with people) we gave up after saturday. On another weekend, we drove from the Cantwell side toward Paxson. I have to say all the Ahtna no trespassing signs for the first 30-35 miles came as a surprise. They want to argue that they live a subsistence lifestyle, I don't buy it. If they can spend $40,000+ for a pickup, $10,000+ for a snowmachine, $10,000+ for a side-by-side, $35,000+ for a boat, they are not just subsisting. Not any more than the rest of us hunters. Not to mention this being the time of year the PFD comes out, most residents get a financial boost and I don't see too many people turning down that money. I would like to see the whole Community Harvest go away, it has too many loop holes and far too many people abuse it. It should be a regular draw hunt. I think it was a terrible idea from the beginning, no one tribe or group of people should have special rights over anyone else that applies for a tag and takes their chances at being drawn. It feels a little like being discriminated against for being non-native if they get preferential treatment.

Submitted By
Carl Seutter
Submitted On
10/13/2016 3:46:26 PM
Affiliation

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RE: Prop 154 I oppose proposition 154. Carving out a larger allocation of game for a select user group is not the way to solve issues in units 11,12, and 13. The explosion in the number of "special" community harvest tickets and the subsequent reduction in hunter success speaks to reevaluating the entire community harvest program and it's validity, not further expansion of limits and seasons for a select few.

Submitted By
John Stockton
Submitted On
10/13/2016 4:33:47 PM
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I Oppose!

Alaska Constitution

Article 8 - Natural Resources

3. Common Use

Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.

This is all you need. You cannot move forward with proposal 154 to limit moose and caribou opportunity to everyone other than the Ahtna group as it would be a direct violation of our state constitution. I can't believe you would even entertain the idea.

Submitted By
Eugene
Submitted On
10/13/2016 4:42:48 PM
Affiliation

I oppose proposition 154 that would limit moose and caribou opportunity to everyone other than the Ahtna group. They already have the opportunity to hunt any bull in August as well as participate in the group hunt. That is already a conflict of interest concerning the states management of wildlife as far as article 8 section 3 of the state constitution. Giving one group priority over another is unconstitutional according to our state constitution.

Submitted By
Jeffrey Sperry
Submitted On
9/27/2016 9:05:52 PM
Affiliation

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I would like to comment on the proposed changes being put forth at this meeting.

I believe that the CSH moose hunt should be terminated. In Ahtna's request they state that there is a "lack of opportunity to meet subsistence needs" There is plenty of opportunity if people get out to hunt at the beginning of the season and hunt hard. There is plenty of animals to be found as demonstrated by the fact that the any bull quotas are being met. Additionally they have more land to hunt on than other hunters based on the fact that Ahtna lands are closed to non Ahtna members.

Additionally for Ahtna's opportunity to meet subsistence needs - they also have the option of participating in the Federal subsistence hunts for moose and caribou which would be a good alternative to the CSH moose and caribou hunts.

I oppose increasing the CSH any bull quota because shooting smaller bulls will decrease the future breeding stock of the moose population. I also oppose extending the moose season to at least September 25th as that will move into the rutting season and increase the possibility that the meat will not be good.

Regarding other items that may be discussed during the meeting:

I believe that the taking of a brown bear, mountain goat or sheep by a nonresidents who are accompanied by resident relatives within the second degree of kindred should not count against the resident's bag limit. That is totally unfair to the resident who may want to enjoy the opportunity to hunt with a parent, sibling, or child.

Thank you for this opportunity.

Submitted By
Jeffrey Sperry
Submitted On
9/30/2016 8:43:40 AM
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I would like to add to my previous comments.

I would recommend for Tier I and Community Harvest Hunts that no atvs be allowed to be used. Traditional and Customary from many years ago was before atvs.(in recent years there is a significant increase in the number of atv created ruts and new trails across the land) I would allow boats on waterways but perhaps restrict the horsepower of the boats. Not allowing the use of ATVs would significantly decrease the number of hunters in those hunts and the quotas of the any bull hunts would not be reached so quickly, thus allowing more hunting time for people.

Drawing permits could allow ATVs but restrict their use to already well documented trails (even identify those trails in the hunt conditions)

Thank you

RHAK
Resident Hunters of Alaska
unapologetically FOR ALASKAN RESIDENTS
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October 13, 2016

Comments to the Alaska Board of Game

Special Meeting Teleconference Oct. 23, 2016

Board of Game Public Process

Resident Hunters of Alaska (RHAK) believes that on issues as contentious and divisive and longstanding as the Copper Basin Community Subsistence Harvest (CSH) hunts, that any decisions and changes made should only be considered at a regularly scheduled BOG regulatory meeting, via a legitimate ACR request or in cycle.

Even though this meeting was public noticed (during hunting season!) and adheres to the Administrative Procedures Act, the public and Advisory Committees were not given enough notice and time to become educated on this Ahtna special request and to send in informed comments.

There is also the issue of process, and the Board of Game living up to the premise that Alaska has the best public system of wildlife management in the nation. These special teleconference meetings in which regulatory action can be taken remove the public from much of the process. There is a short window to become informed and send in written comments, and no oral testimony during the meeting is allowed. The public and AC representatives won't be in the same room with the board and be able to speak with board members. The internet streaming of a phone teleconference among board members at various locations across the state can be garbled, hard to hear, or simply go out.

We recognize that there are on occasions valid reasons to hold a special regulatory meeting outside the normal cycle. There were concerns that with the new 3-year Board of Game regulatory cycle there would be more ACRs or special requests such as this one from Ahtna. The Commissioner and the Board should be wary in now approving requests that don't really meet the guidelines necessary to call a special meeting or to accept ACRs.

Proposal 154

The problems we have now with the Copper Basin CSH hunts are a product of Ahtna's original proposal to create this hunt and the Board's subsequent passage of it, even though the board was advised at the time that it was likely unconstitutional to create a type of Tier hunt in which only members of certain communities were able to participate. The courts overturned the Board's original Copper Basic CSH hunt as applying only to the 8 Ahtna communities and said that if this hunt continued it would have to be open to all Alaskans, no matter where they lived, who formed a community and met the guidelines.

Once it became wide open for all to take part, we have seen a consistent increase in applicants and participation, which has led to crowding, conflicts, and the moose any-bull quotas being reached shortly after the season opener.

Basically, Ahtna is arguing that too much competition from non-local hunters who participate in the CSH hunts is resulting in their subsistence needs not being met. But increasing the quotas and/or bag limits, as Ahtna requests, will do nothing to change this general trend or provide the relief they seek, and could even make things worse, both in terms of hunting opportunity and how it may affect our wildlife resource.

There are no easy or legal answers and the Copper Basin CSH hunts as they stand now seem a poor management strategy in terms of providing a lengthy any-bull moose hunting season for all, and have led to crowding and conflicts afield during the early part of the season.

We urge the board to take no action on Proposal 154 at this special meeting.

Schedule Reconsideration of Proposal 51 as amended

RHAK strongly opposed and continues to oppose Proposal 51 as amended and passed at the 2016 Statewide meeting in Fairbanks. It is unconscionable that at the request of the Alaska Professional Hunters Association the board restricted a resident hunter's ability to hunt and harvest a sheep, mountain goat, or brown/grizzly bear with a next-of-kin nonresident relative, when there were no conservation concerns for those species brought forth by the Department.

This is also a highly contentious and divisive issue and we do not support the Board calling another special regulatory meeting on this unless the special meeting is only to consider rescinding Proposal 51 as amended.

Agenda Change Requests

According to 5 AAC 92.005(a)(5), *"if one or more agenda change requests have been timely submitted, the board shall meet to review the requests within 30 days following the submittal deadline in subsection (4), and may meet telephonically for this purpose."*

Since the deadline for submitting ACRs for the Region V Bethel meeting is November 4, 2016, and this special meeting is scheduled for October 23rd, it is safe to assume that more ACR requests will come in just prior to or after this meeting and that the board will have to meet within 30 days after November 4th anyway to deliberate ACRs.

This special half-day regulatory meeting was called specifically to discuss and deliberate on the Ahtna request which has been converted into proposal #154. We assume that the Department will give reports, perhaps federal land managers as well, and that there will be lengthy board discussion and deliberation on such a contentious issue that affects so many Alaskans and our wildlife resource.

Tacking on ACRs to this special meeting would make sense to save the Board's time if the deadline for ACRs had already passed prior to the meeting date. But that isn't the case, and adding so many ACRs to be heard at this meeting detracts from the real purpose the meeting was called and the time the Board has to discuss and deliberate on that important issue.

There is an Agenda Change Request policy under 5 AAC 92.005 and we always ask the Board to adhere fairly to that policy when weighing agenda change requests.

Resident Hunters of Alaska
info@residenthuntersofalaska.org
www.residenthuntersofalaska.org

Submitted By
Bob Wodward
Submitted On
10/13/2016 2:54:30 PM
Affiliation

Crisis can be a teacher. All indigenous human societies eventually learned self-restraint, if they stayed in one place long enough. They discovered through trial and error that exceeding their land's carrying capacity led to awful consequences. That's why these peoples appear to moderns as intuitive ecologists: having been hammered repeatedly by resource depletion, habitat destruction, overpopulation, and resulting famines, they eventually realized that the only way to avoid getting hammered yet again was to respect nature's limits by restraining reproduction and protecting other forms of life.

We have forgotten that lesson, because our civilization was built by people who successfully conquered, colonized, then moved elsewhere to do the same thing yet again–and because we are enjoying a one-time gift of fossil fuels that empower us to do things no previous society ever dreamed of.

We have come to believe in our own omnipotence, exceptionalism, and invincibility. But we have now run out of new places to conquer, the best of the fossil fuels are used up, and the environmental consequences of burning them are starting to catch up with us.

We can learn from crisis; cultural anthropology shows that. But, in this instance, we need to learn fast and perhaps some organized effort to aid that process would be well spent. Planetary boundaries discourse could help explain to frightened masses why the world seems to be falling apart around them, while community resilience-building could help them adapt to changing conditions.