

## Wrangell-St. Elias National Park Subsistence Resource Commission

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

Nate Turner, Vice Chairman  
Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99802-5526

March 6, 2014

Dear Mr. Turner:

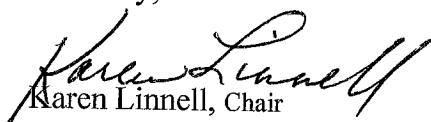
The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center on March 4 and 5, 2014. At this meeting, commission members discussed the Copper Basin Community Hunt and the upcoming Alaska Board of Game Committee on Copper Basin Area Hunting Regulations. The SRC represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve, including residents of Copper Basin communities. In addition to hunting within Wrangell-St. Elias, many of our constituents use GMU 13 extensively, with a significant dependence on moose and the Nelchina caribou herd.

We have heard from some of our members that the hunt is working relatively well for the Ahtna community, with significant sharing occurring. We have also heard concerns about implementation of the hunt, and offer the following recommendations:

- First, the court documents say that other communities MAY be eligible to participate in the hunt. This does NOT state that any group is deemed eligible. Accordingly, the department needs to have a rigorous process to evaluate group applications to insure that any group that applies 1. Actually exists as a real community and 2. Meets the 8 criteria as a customary and traditional participant in the hunt.
- Second, groups interested in being recognized as communities in order to participate in the hunt should go through the same application process that the Board of Game-used to approve the Ahtna community. This includes submission of a proposal to the Board of Game, a public comment opportunity and approval by the Board on meeting the eligibility requirements to participate.
- Third, enforcement of the hunt rules needs to be tightened up, and the rules should be enforced consistently across all participating communities. For example, sharing should be documented, and if a group fails to meet the reporting requirements, they should not be eligible to participate in the hunt the next season.

Thank you for considering our recommendations.

Sincerely,

  
Karen Linnell, Chair