

ROUND ISLAND TASK FORCE REPORT

March 15, 1993

Executive Summary

At the fall 1991 Board of Game meeting, the Togiak Traditional Council requested access to Round Island to harvest up to 10 male walrus. After hearing much testimony, the Board deferred action until more information could be assimilated. This report summarizes an investigation by a task force established by the Alaska Department of Fish and Game to examine the issue for the Board prior to their March 1993 meeting. The task force was comprised of individuals from a variety of interest groups. Public meetings were held in Dillingham and Togiak, and technical information was solicited from marine mammals biologists, traditional hunters, and the Eskimo Walrus Commission.

The task force concluded that a carefully controlled traditional harvest of up to 10 walrus from Round Island in October would not have serious impacts on the walrus population or the continued use of the island as a major haulout. The task force also noted that most of the objection to the proposed hunt was over the issue of hunting within an established wildlife sanctuary. Although these are not biological issues, they are important to many individuals and need to be addressed. Another important aspect of the proposal is the cultural importance of the proposed hunt to villagers in Togiak and other Bristol Bay villages.

This report does not make a recommendation on whether or not access for walrus hunting should be permitted. It does, however, provide a list of items which need to be considered if the Board decides to accept the proposal.



CONTENTS

Task Force Members and Staff.....	Page ii
Record of Meetings	ii
Report Memorandum to the Commissioner.....	iii
Task Force Findings.....	1
Hunt Requirements.....	5
Appendices	
I. Fall 1991 Regulation Proposal.....	7
II. Spring 1993 Regulation Proposal	8
III. Example of regulation changes required	10
to authorize access to Round Island	
for hunting.	
IV. Summary of possible advantages and	13
disadvantages to limited subsistence	
hunting of walruses on Round Island	

TASK FORCE MEMBERS

Robert Nelson (Chairman), ADFG, Wildlife Conservation, Nome
Joseph Clark, Nushagak Advisory Committee, Clarks Point
James Fall, ADFG, Subsistence, Anchorage
Moses Kritz Sr., Togiak Traditional Council, Togiak
S. Douglas Miller, National Wildlife Federation, Anchorage†
Benjamin Nageak, Eskimo Walrus Commission, Barrow
Dana I. Seagars, USFWS, Marine Mammals Management, Anchorage

† Deceased, Replaced by Anthony N. Turrini, National Wildlife Federation

STAFF

Joseph Chythlook, ADFG, Boards, Dillingham
Lawrence Van Daele, ADFG, Wildlife Conservation, Dillingham

RECORD OF TASK FORCE MEETINGS

March 1992	Task Force Members Identified
1 April	Public Meeting, Dillingham
2 April	Town Meeting, Togiak
20 August	Meeting with Marine Mammal Biologists and walrus hunters, Fairbanks (Cancelled due to Mt. Spur Eruption)
12 October	Meeting Rescheduled with Marine Mammal Biologists, walrus hunters and Pacific Walrus Technical Committee, Anchorage
13 October	Results presented to Eskimo Walrus Commission, Anchorage
14 October	Task Force Drafted its Report
20 November	Report sent to Commissioner

MEMORANDUM**STATE OF ALASKA
DEPARTMENT OF FISH AND GAME**

TO: Carl Rosier
Commissioner
Department of Fish and Game
Juneau

DATE: February 26, 1993

THRU: Wayne Regelin
Deputy Director
Div. of Wildlife Conservation
Juneau

TELEPHONE: 443-2271

FROM: Bob Nelson
Wildlife Biologist
Div. of Wildlife Conservation
Nome

SUBJECT: Round Island Task
Force

At their fall 1991 meeting, the Board of Game was asked to consider a proposal presented by the Togiak Traditional Council requesting access to Round Island for the specific purpose of harvesting 10 male walruses. After hearing much testimony, both for and against; and after much deliberation, the Board deferred action and passed a resolution requesting the following: 1) the U. S. Fish and Wildlife Service to include a comprehensive assessment of walrus management concerns in Bristol Bay in a walrus conservation plan currently in draft form; and 2), the Department establish a task force of individuals from ADF&G, the people of Togiak and other villages in the Bristol Bay area, and other wildlife biologists and members of the public to identify and address the unresolved issues surrounding walrus disturbance as well as other issues the task force may direct and, issue a report to the Board of Game at their Spring 1993 meeting; and 3), the Alaska Board of Game will again consider the proposal of the people of Togiak at the spring 1993 meeting.

In March 1992, the Department appointed the following people to be on the task Force. Robert Nelson (chair), Division of Wildlife Conservation; James Fall, Division of Subsistence; Dana I. Seagars, U. S. Fish and Wildlife Service, Marine Mammals Management; Benjamin Nageak, Eskimo Walrus Commission; Moses Kritz Sr., Togiak Traditional Council; Joseph Clark, Nushagak Advisory Committee; and S. Douglas Miller, National Wildlife Federation. The Department also appointed Lawrence Van Daele, Division of Wildlife Conservation and Joseph Chythlook, Division of Boards as staff to the task force.

The group met formally for the first time in Dillingham on 1 April 1992. That evening a public meeting was held; however, no one other than task force members and staff showed up. On the following day, the task force flew to Togiak and participated in a town meeting, attended by at least 15 people from the community, listened to public testimony and asked questions. A meeting scheduled for 20 August in Fairbanks with several marine mammal biologists was cancelled due to the eruption of Mt Spurr. That meeting was re-scheduled and took place in conjunction with a meeting of the Pacific Walrus Technical Committee in Anchorage on 12 October. A presentation of our findings was given to the Eskimo Walrus Commission on the following day. On 14 October, the task force reviewed their findings.

After considerable discussion and review, the task force elected to compile a list of the comments and concepts heard and discussed throughout the different meetings; and, to list those issues which needed to be addressed by the Board and the Department if the decision was made to approve the proposal.

It was apparent to all members of the task force that much of the opposition to the original proposal was not based on biological issues. None of the walrus experts provided input indicating that the taking of 10 walruses, if done under the right circumstances, would have any adverse impacts on the population or their behavior. Most opposition appeared to be based on principle (i.e. a sanctuary should be just that) and individuals seemed to be more concerned over the long-term precedent which might be set. The task force members also were in agreement that a limited, well-managed hunt conducted in a traditional manner would be unlikely to have any long-term effects on the use of the haulout by walruses or in the overall status of the population. Nevertheless, such a hunt, if it were to be permitted, should be carefully monitored and periodically evaluated.

The issue is undoubtedly a complicated one and many questions remain unanswered. The attached information compiled by the task force will hopefully prove useful to the Board when reconsidering this proposal.

cc: Round Island Task Force Members

TASK FORCE FINDINGS

The following findings were developed by the Round Island Task Force after listening to comments and discussions revolving around the proposal presented to the Board of Game during fall 1991 requesting access to Round Island, Walrus Islands State Game Sanctuary, for the specific purpose of hunting walruses:

1. The proposal submitted by the Togiak Traditional Council (TTC) deals with the question of access and is not a hunting question.
 - * The Native exemption provided within the Marine Mammal Protection Act of 1972 allows Alaskan Natives to harvest marine mammals for subsistence and for the creation of authentic native handicrafts.
 - * All islands and adjacent waters within one half mile of each island in the sanctuary, except for those islands known as the Twins and their adjacent waters, are closed to hunting by State regulation (5AAC 92.510 (13)(A)).
2. A number of multiple uses already occur (or could occur) on and/or around the perimeter of Round Island. They are:
 - * Visitations: approximately 200 people visit the island annually for the expressed purpose of viewing wildlife as provided under 5AAC 92.066 and 5AAC 93.035.
 - * Commercial fishing for salmon and herring occurs outside of the 3 mile limit.
 - * Commercial fishing for yellow fin sole and other ground fish occurs outside of the 12 mile limit.
 - * Research, on walruses and other species, has been ongoing for a number of years.
 - * Oil and mineral exploration are not under way at the present time; however, provisions are available for these activities to take place (AK. State Statute 16.20.130).
3. The justification for the proposal submitted by the TTC were as follows:
 - * To provide an opportunity for residents of Togiak and other Bristol Bay communities to return to a traditional hunting area which has been unavailable to them since the early 1960s.
 - * To provide an opportunity for elders to pass on traditional hunting methods concerning hunting walrus on haulouts to younger members of the community. A lack of hunting opportunity has disrupted the transmission of this knowledge.
 - * To obtain a reliable source of walrus meat which is nutritionally and culturally important to residents of Togiak and other Bristol Bay communities.

- * To contribute to the conservation of the walrus resource by reducing hunting loss caused by the taking of walruses in open water.
- 4) It was the intent of the TTC to:
- * Work within the State Regulatory System.
 - * Initiate, design, and follow a hunting plan conducted in cooperation with the Eskimo Walrus Commission (EWC), the Alaska Department of Fish & Game (ADF&G), and the U. S. Fish & Wildlife Service (USFWS).
 - * Act as the clearinghouse and to recommend the issuance of ADF&G permits to qualified walrus hunters.
 - * To provide ADF&G and USFWS with any requested information regarding the hunt and biological specimens.
 - * Harvest a limited number of walruses during a traditional time of the year, when there would be no other visitors on the island, after the end of the ground fish trawl closure, and when the total number of walruses utilizing the beaches would be significantly less than at peak periods.
 - * To conduct the hunt in such a manner as to minimize the effects on the use of the haulout by walruses.
- 5) Walrus haulouts in Alaska and Internationally are currently not being managed in a consistent manner.
- * There is a need for international action leading to a consistent approach (i.e. through a management plan and international agreement) for management of walruses on land-based haulouts. Such a plan should be developed cooperatively by all agencies and user groups, and should consider traditional uses and hunting patterns.
- 6) Available data indicate the Pacific walrus population is probably stable or declining slightly. The most recent survey data indicate the population remained above the minimum bounds of the Optimum Sustainable Population (OSP) range as determined in 1977 by an Administrative Law Judge. A harvest of 10 walruses taken in a manner as suggested in the proposal would in no way jeopardize the overall health and stability of the population.
- 7) Local, regional, and range-wide factors may all influence walrus use of Round Island. These factors may operate independently or in synchrony. For example, the number of walruses on a single haulout may be influenced to a varying degree by long and short-term factors such as: range wide and seasonal shifts in distribution, local movement patterns and use of nearby haulouts, weather and cyclic haulout patterns at the site, and both offshore and onshore disturbance.

- 8) Walrus hunting using traditional techniques prior to the middle 1900s were thought to have had little impact on the use of Round Island beaches by walruses. Hunting activities of the late 1950s were thought to be partially responsible for the displacement of walruses from Round Island; and in part were one of the reasons for establishment of the sanctuary.
- * Traditional hunting techniques known to elder walrus hunters in Togiak and several other Bristol Bay hunting communities are summarized in a report prepared by ADF&G Division of Subsistence (Technical Paper No 212).
 - * The scientific data on the effects of hunting on walrus haulouts are largely anecdotal. While the existing information is inconclusive, it generally supports the concept that regular disturbance to walruses on haulouts may result in anything from complete abandonment to an increase in physiological stress.
 - * Continuous aerial and sub-surface acoustic disturbances during prime haulout periods by ground fish trawlers is thought to result in the displacement of walruses from the surrounding waters and beaches of Round Island.
 - * Intensive hunting pressure on walruses attempting to establish a haulout on King Island during the summer months of the early 1980s was thought to have caused the haulout to be abandoned.
 - * Russian scientists expressed concerns with harvesting walruses on haulouts. Published data cited examples of displacement and abandonment which led to complete protection of all Russian haulout sites.
 - * Researchers with experience on tagging Round Island walruses reported short-term intermittent disturbances seemed to have no long-term impact, even at times of high walrus densities on the haulout.
- 9) The Eskimo Walrus Commission (EWC) in the past has supported reducing disturbance on Round Island by:
- * Advocating haulout protection at all walrus haulouts (including a recommendation for the establishment of a preserve at Cape Seniavin).
 - * Advocating additional research and monitoring of the effects of human disturbance to walruses.
 - * Advocating sound hunting practices.
 - * Supporting fishing zone restrictions.
 - * Expressing concern over the cumulative effects of disturbances.
- 10) Why focus on Round Island as a walrus hunting area?
- * It was a traditional hunting area for a number of communities within the Bristol Bay area.
 - * It is closer to Togiak than haulouts at Cape Peirce.

- * Round Island beaches are composed of more rock and less sand making butchering walrus a cleaner process than on other beaches, such as the Nunvak area near Cape Peirce.
 - * Unlike other haulouts currently used by walrus in the Bristol Bay area, Round Island is considered a reliable walrus hunting area. Animals are usually present and retrieval of killed animals is more or less guaranteed.
 - * Unlike beaches located on the Twins, Round Island beaches provide safer landing places for boats.
- 11) Public opinion about allowing hunting in a Sanctuary must be factored into the Board's decision.
- * Members of the general public are not well educated on the issue and need to be made aware of all the facts
 - * This is more than a biological issue. The taking of 10 walrus will not have a biological impact on the walrus population. Some members of the public question the desirability of setting a precedent of allowing hunting to occur in a wildlife sanctuary.
 - * Information regarding the issue should be widely distributed by both State and Federal Agencies throughout Alaska, the lower 48, and other countries prior to the spring Alaska Board of Game meeting. This information should emphasize the following:
 - Regulations regarding all human uses of the sanctuary are developed through a cooperative process.
 - A limited, well-managed hunt would provide an opportunity to gain scientific information on the effects of walrus hunting on haulouts.
 - Such a hunt could contribute to the conservation of walrus through the reduction of "lost" walrus when harvested on land instead of the open water.
 - These data may establish guidelines that could be used in similar management issues in the future.
- 12) Should the proposal be approved by the Board of Game, the Board should also adopt a hunt management plan to ensure that the potential impacts of the hunt are minimized.

HUNT REQUIREMENTS

If the Board elects to adopt the proposal and allows the harvest of walrus from specific beaches of round island, the members of the task force feel the following points need to be addressed prior to the implementation of a hunt:

- 1) An allowable harvest limit must be established.
 - * The number of walrus harvested should not exceed 10 male walrus annually
- 2) A time frame for the harvest should be specified.
 - * The season should be October 1-31.
- 3) Since one other species of marine mammal currently utilizes some the beaches on Round Island, the area open to hunting needs to be well defined.
 - * It should exclude any and all beaches currently being utilized by sea lions (*Eumetopias jubatus*).
 - * In an effort to reduce disturbance as much as possible, access routes to Round Island should be clearly indicated. The existing access corridor should be used as much as possible.
- 4) Method & Means should cooperatively be defined by the TTC, EWC, USFWS, and ADF&G.
 - * Only the most humane and non-wasteful methods should be allowed.
- 5) ADF&G, TTC, and EWC should cooperatively develop a suitable access permit and determine the number of permits to be issued.
 - * ADF&G should be responsible for issuing all access permits based on recommendations of the TTC and the EWC.
 - * Permits should be issued only to qualified hunt leaders and their parties.
- 6) Salvage Requirements (taking into consideration those requirements listed within the Marine Mammal Protection Act) should be clearly defined.
 - * A reasonable effort should be made to: 1) salvage all meat, skin, edible internal organs, ivory, and oosiks and, 2) leave the haulout in the same condition as it was prior to the hunt.
- 7) All successful hunters should provide hunt information and specimens as prescribed by ADF&G and USFWS.
- 8) The Department should be required to conduct a study to monitor the potential effects of permitting access to Round Island for walrus hunting.
 - * The focus of the monitoring should be on the potential impacts to walrus. Assessment of walrus disturbance and behavior before, during,

and after hunts could best be accomplished by having qualified personnel on Round Island between the dates of 15 September and 31 October.

- * The Department should cooperate with USFWS, the EWC, and the TTC in the design and implementation of the monitoring program and any ensuing recommendations.
 - * A study report should be made available to the Board of Game for its use when it next evaluates the regulations permitting hunting access.
 - * The Task Force notes that implementation of such a monitoring program will require the Department to augment the operating budget of the Walrus Islands State Game Sanctuary. Available funds are insufficient to take on the additional expense (estimated to be \$10K/season) associated with carrying out a scientifically valid monitoring program.
- 9) Cooperative enforcement activities need to be addressed:
- * Non-permittees found hunting on the island - ADFG and FWP.
 - * Violations by permittees - ADF&G and TTC.
 - * Wasteful take harvest by non-natives - USFWS and ADF&G.
- 10) Access to individuals with the expressed purpose of hunting walrus should be for a trial period and should have a clearly defined "sunset date" incorporated. Suggested wording might be:
- * "Continued access to Round Island for the expressed purpose of hunting walrus will sunset after 3 years. Prior to the sunset date, the Board of Game will evaluate the results of the mandatory monitoring program and determine whether continued access should be allowed."
- 11) The following regulations would need to be changed:
- * 5AAC 92.066 - Permit For Access To Walrus Islands State Game Sanctuary.
 - * 5AAC 92.510 (13) (A) - Areas Closed To Hunting - Unit 17.
 - * 5AAC 93.035 - Fees For Walrus Islands State Game Sanctuary Access Permits.

Appendix I. Fall 1991 regulation proposal

PROPOSAL 49 - 5 AAC 92.510.(13)(A). AREAS CLOSED TO HUNTING. Amend this subparagraph to provide the following:

1) 5 AAC 92.510 (13)(A) would be amended to provide a one month opening in October for subsistence walrus hunting. 2) The hunt would be limited to 10 bull walrus. 3) The hunt would be administered by the Togiak Traditional Council in cooperation with ADF&G.

PROBLEM: The closure of the Walrus Islands State Game Sanctuary to subsistence walrus hunting. The people of Togiak and other Native coastal communities have hunted marine mammals since time immemorial. Since the creation of the Sanctuary they have been denied access to an important traditional hunting area.

WHAT WILL HAPPEN IF NOTHING IS DONE? Continued erosion of our culture. Continuing difficulty exercising our rights preserved by the Marine Mammals Protection Act.

WHO IS LIKELY TO BENEFIT? Native village residents.

WHO IS LIKELY TO SUFFER? No one. The complete closure of Round Island to walrus hunting is not biologically justified. A carefully administered harvest would not adversely affect the walrus population. A hunt after the main haulout season would not adversely affect the recreational and scientific values of the Sanctuary.

OTHER SOLUTIONS CONSIDERED? None considered at this time.

Appendix II. 1993 Regulation Proposal.

PROPOSAL 10 - 5 AAC 92.510.(13)(A). AREAS CLOSED TO HUNTING. Amend this subparagraph to provide the following:

1) 5 AAC 92.510(13)(A) would be amended to provide a one month opening in October for subsistence walrus hunting. 2) The hunt would be limited to 10 bull walrus. 3) The hunt would be administered by the Togiak Traditional Council in cooperation with ADF&G.

Note: This proposal was deferred at the Fall 1991 meeting for action at the Spring 1993 meeting. The board also passed a resolution requesting that the department, U.S. Fish and Wildlife Service, the people of Togiak and other villages in Bristol Bay convene a series of meetings to address the effect of walrus disturbances on haulouts, level and efficiency of harvests, and methods and means for ensuring minimal disturbance to haulouts and report back to the board at the Spring 1993 meeting.

Background: In November 1991 the Togiak Traditional Council requested that the Board of Game consider a limited and carefully controlled subsistence hunt of walrus on Round Island in the Walrus Islands State Game Sanctuary. This island is presently closed to hunting.

Testimony before the Board revealed two conflicting points of view. Biologists and others expressed concern over the disturbance that hunting would cause to walrus resting in the Sanctuary, difficulties in legally regulating Native hunters once they were allowed to hunt there, and the potential for world-wide negative public reaction to the idea of killing animals in an established Sanctuary. Alaska Natives, especially residents of Togiak and other Bristol Bay communities, represented the second perspective. Alaska Natives have used Round Island (Yup'ik *Qayaciq*, "place to go in a kayak") for at least 2500 years. Legal hunting on the island ended with creation of the Sanctuary in 1960. Elders and other spokespersons indicated the strong desire to rekindle that tradition in a nonwasteful manner and without causing significant disturbance to most walrus using the Sanctuary.

After hearing testimony, the Board of Game formed a Round Island Task Force representing all interested parties. The task force was instructed to explore all aspects of the proposed hunt and report back to the Board in Spring 1993. The board deferred action on the Togiak proposal until that time.

After deliberating, the task force decided to neither support or oppose the subsistence hunt proposed by the Togiak Traditional Council; however, it did make recommendations if such a hunt were authorized by the board. These recommendations include: a maximum harvest of ten (10) male walrus per year in the month of October only; access permits to be developed cooperatively with the Eskimo Walrus Commission, Togiak Traditional Council and Alaska Department of Fish and Game; access to Round Island would be limited to the haulout beaches; harvest must be humane, nonwasteful and carefully reported. The hunts should be closely monitored and evaluated by both ADF&G and the U.S. Fish and Wildlife Service. Annual hunts in October would be conducted for a maximum of three years and then evaluated. Hunters would have to qualify as "Alaska Native coastal residents" under the Marine Mammal Protection Act of 1972.

Controlled subsistence hunting for a small number of walrus in October will probably not affect most haulout activity which occurs earlier in the year, from May through August. Walrus numbers normally peak in July. The wildlife viewing program on the island coincides with summer walrus activity and closes after mid-August.

In 1990 the U.S. Fish and Wildlife Service developed a minimum viable estimate of 201,039 Pacific walrus. The population is probably stable or declining slightly. The most recent data indicate the population is above the minimum bounds of Optimum Sustainable Population. An annual harvest of 10 walrus on Round Island will not jeopardize the overall health and stability of the population.

PROBLEM: The closure of the Walrus Island State Game Sanctuary to subsistence walrus hunting. The people of Togiak and other Native coastal communities have hunted marine mammals since time immemorial. Since the creation of the Sanctuary they have been denied access to an important traditional hunting area.

WHAT WILL HAPPEN IF NOTHING IS DONE? Continued erosion of our culture. Continuing difficulty exercising our rights preserved by the Marine Mammals Protection Act.

WHO IS LIKELY TO BENEFIT? Native village residents.

WHO IS LIKELY TO SUFFER? No one. The complete closure of Round Island to walrus hunting is not biologically justified. A carefully administered harvest would not adversely affect the walrus population. A hunt after the main haulout season would not adversely affect the recreational and scientific values of the Sanctuary.

OTHER SOLUTIONS CONSIDERED? None considered at this time.

PROPOSED BY: Togiak Traditional Council

(HQ-93-G-113)

Appendix III. Example of changes in regulations.

NOTE TO REVIEWERS: THIS PROPOSAL WAS DRAFTED BY THE DIVISION OF WILDLIFE CONSERVATION AS A RESULT OF FINDINGS BY THE ROUND ISLAND TASK FORCE. THESE REGULATION CHANGES WOULD BE NECESSARY IF THE BOARD OF GAME DECIDES TO AUTHORIZE ACCESS FOR THE PURPOSE OF LIMITED WALRUS HUNTING ON ROUND ISLAND AS ORIGINALLY REQUESTED BY THE TOGIAK TRADITIONAL COUNCIL.

PROPOSAL - 5 AAC 92.066. PERMIT FOR ACCESS TO WALRUS ISLANDS STATE GAME SANCTUARY. Authorizes access for a provisional subsistence hunt of walrus on Round Island.

5 AAC 92.510. AREAS CLOSED TO HUNTING. Creates an exception for walrus hunting by access permit.

5 AAC 93.035. FEES FOR WALRUS ISLANDS STATE GAME SANCTUARY. This is a Commissioner's regulation. No action is required by the Board of Game.

5 AAC 92.066. PERMIT FOR ACCESS TO WALRUS ISLANDS STATE GAME SANCTUARY.

(1) ...

(2) a wildlife viewing permit may be issued to an individual for a specific period of time during the period from May 1 through September 1 only; under this permit a person entering the sanctuary shall abide by the following rules established to preserve the natural flora and fauna of the sanctuary; a violation of these rules is a misdemeanor and may be a basis for immediate expulsion from the sanctuary;

(A) ...

(3) visitor access to Round Island for wildlife viewing is allowed by permit issued on a first-come first-served basis; not more than 30 permittees may be permitted to visit Round Island each day, nor may more than 15 be permitted to remain overnight; 10 of the 15 permits available for an overnight period may be issued up to six months in advance; the remaining five may not be issued more than 30 days in advance; at the discretion of the department, up to three of the 15 individual overnight permits may be issued at any time for scientific or educational purposes.

(4)(A) access permits may be issued to qualified hunting parties as specified jointly by the Department and by the Alaska Eskimo Walrus Commission, for the period from 1 October through 31 October only, the permit application will identify the hunting party leader and all crew members; permits will be canceled after a total of 10 walruses are harvested; a total of walruses shot and lost will count toward the harvest; all permittees entering the sanctuary shall abide by the following rules established to preserve the natural habitat of the sanctuary; a violation of these rules is a misdemeanor and may be a basis for immediate expulsion from the sanctuary; determination of emergency or exceptional conditions will be made by the Department;

(1) the Department will establish access corridors for access to Round Island by permittees; unless authorized in writing by sanctuary staff, access to any part

of the island beyond the immediate beaches where walrus haul out is prohibited; all aircraft access is prohibited;

(2) a permit becomes invalid if the permittee fails to contact the Round Island staff or the Dillingham Wildlife Conservation area office prior to the permittee's scheduled arrival at Round Island;

(3) discharge of firearms except for the taking of walrus is prohibited; permittees shall conduct their activities in such a manner as to minimize disturbance to use of the haulout by walrus; traditional hunting methods shall be used whenever possible;

(4) permittees shall make a reasonable effort to salvage all edible and traditionally used walrus parts and shall remove all personal gear, refuse and animal remains from the beach before departing the sanctuary; removal or deliberate disturbance of wildlife and wildlife parts (except for harvested walrus), archaeological artifacts, and A.D.F. & G. equipment is prohibited;

(5) camping is allowed only as a written condition of the permit;

(6) swimming and diving is prohibited;

(7) pets are prohibited on Round Island;

(8) upon request by an employee of the department, a permittee shall present his or her permit and personal identification for inspection;

(B) this access permit program is authorized for a 3-year term beginning July 1, 1993; however, the program may be terminated at any time if significant adverse impacts are attributed to walrus hunting on Round Island;

5 AAC 92.510.(a)(13)(A). is amended to read:

5 AAC 92.510. AREAS CLOSED TO HUNTING. (a) ...

(13) Unit 17

(A) all islands and adjacent waters within one-half mile of each island in the Walrus Islands State Game Sanctuary, as described in AS16.20.092 [16.20.110], except for those islands known as the Twins and their adjacent waters are closed to hunting; however, walrus may be hunted on Round Island by persons possessing access permits issued under 5 AAC 92.066.

Note: chapter 93 is a Commissioner's regulation. It is the Department's intent to make the following change if the Board approves changes 5 AAC 92.066. and 5 AAC 92.510.

5 AAC 93.035(b). is amended to read:

5 AAC 93.035. FEES FOR WALRUS ISLANDS STATE GAME SANCTUARY ACCESS PERMIT. (a) Fees for permits issued by the department under 5 AAC 92.066 for access to Round Island and adjacent waters in the Walrus Islands State Game Sanctuary are as follows:

(1) for a camping wildlife viewing permit each application must be accompanied by a fee of \$50 per person;

(2) for a day-use wildlife viewing permit, the fee is \$10 per person per day;

(3) for a hunter access permit, the fee is \$25 per person per day;

(b) scientific/educational permits are issued free of charge.

(c) the department will refund to an unsuccessful camping permit application the fee submitted under (a) (1) of this section.

Proposed Regulated Subsistence Hunting on Round Island

Possible Advantages

- * No biological problems for walrus population at proposed harvest level.
- * No direct visitor impacts - hunting would occur after the visitor season.
- * Reestablish a traditional use by Bristol Bay residents.
- * Involves Togiak residents in Round Island walrus management.
- * Reduces or eliminates illegal take in area.
- * Would reduce waste associated with shooting walruses in the water.
- * May encourage management participation by U.S. Fish and Wildlife Service.

Proposed Regulated Subsistence Hunting on Round Island

Possible Disadvantages

- * Public reaction to hunting in a sanctuary.
- * Violates concept of sanctuary.
- * Increased administrative cost and management complexity.
- * Difficulty in controlling hunting activity once it has begun.
- * Possible changes in walrus behavior and use of haulout beaches.
- * If limited subsistence hunting why not more access for yellow fin sole fishermen?
- * A legal permitting process must be devised.
- * ADF&G controls access only; no direct management authority for walrus at this time.
- * Increased federal participation may be viewed as undesirable.