



# Subsistence in Alaska: A Year 2010 Update

RC 16

Division of Subsistence, Alaska Department of Fish and Game  
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## Introduction

Subsistence fishing and hunting are important for the economies and cultures of many families and communities in Alaska. Subsistence uses exist alongside other important uses of fish and game in Alaska, including commercial fishing, sport fishing, personal use fishing, and general hunting. This report provides an update on subsistence fishing and hunting in Alaska, including the dual state-federal management system.

## What is Subsistence Hunting and Fishing?

State and federal laws define subsistence uses as the "customary and traditional uses" of wild resources for food, clothing, fuel, transportation, construction, art, crafts, sharing, and customary trade. Subsistence uses are central to the customs and traditions of many cultural groups in Alaska, including Aleut, Athabaskan, Alutiiq, Euroamerican, Haida, Inupiat, Tlingit, Tsimshian, and Yup'ik. Subsistence fishing and hunting are important sources of employment and nutrition in almost all rural communities.

Commercial fishing differs from subsistence fishing because it is harvesting fish for sale in commercial markets. Subsistence fish and game cannot be commercially sold. Personal use fishing is similar to subsistence fishing, except that it is fishing with nets for food in areas generally closed to subsistence, particularly by residents of urbanized areas. Sport fishing and sport hunting differ from subsistence in that, although food is one product, they are conducted primarily for recreational values, following principles of "fair chase." While subsistence harvesting and processing are

productive economic activities which are part of a normal routine of work in rural areas, sport fishing and sport hunting usually are scheduled as recreational breaks from a normal work routine.

## Who Qualifies to Participate in Subsistence Harvesting?

Federal and state laws currently differ in who qualifies for participation in subsistence fisheries and hunts. Rural Alaska residents qualify for subsistence harvesting under federal law. About 17% of Alaska's population (121,170 people in 263 communities) lived in rural areas (outside nonsubsistence areas) in 2010 (Figure 1). Of the rural population, 67,024 (55%) were Alaska Native and 54,146 (45%) were not Alaska Native. Of Alaska's urban population (589,061 people), about 71,288 (12%) were Alaska Native and 517,773 (88%) were not Alaska Native. Under state law, rural residents qualified for subsistence harvesting from 1978-1989. Since 1989, all state residents have qualified under state law.

## Who Participates in Subsistence Uses?

Most rural families in Alaska depend on subsistence fishing and hunting. A substantial proportion of rural households harvest and use wild foods (Figure 2). For surveyed communities in different rural areas, from 92%-100% of sampled households used fish, 79%-92% used wildlife, 75%-98% harvested fish, and 48%-70% harvested wildlife. Because subsistence foods are widely shared, most residents of rural communities use subsistence foods during the course of the year.

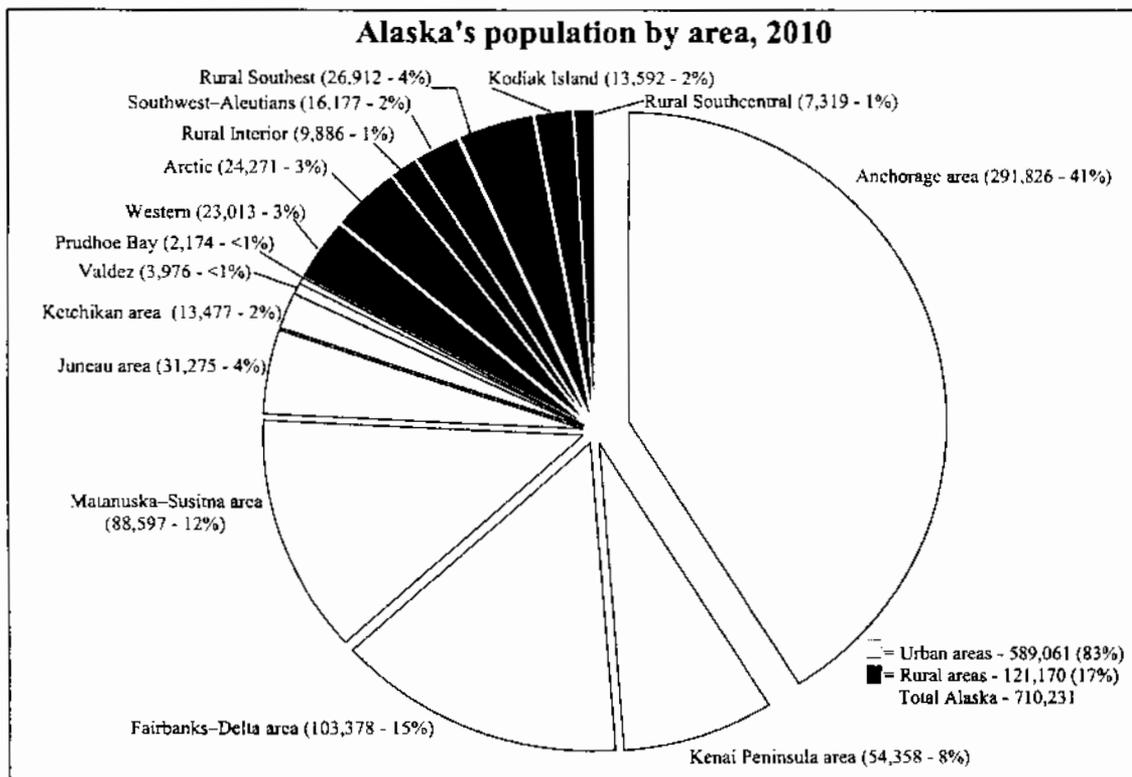


Figure 1

### Percent of households participating in subsistence activities in rural areas

Area	Harvesting game	Using game	Harvesting fish	Using fish
Arctic	63%	92%	78%	96%
Interior	69%	88%	75%	92%
Southcentral	55%	79%	80%	94%
Southeast	48%	79%	80%	95%
Southwest	65%	90%	86%	94%
Western	70%	90%	98%	100%
<b>Total rural</b>	<b>60%</b>	<b>86%</b>	<b>83%</b>	<b>95%</b>

Figure 2

### What is the Rural Food Harvest?

Most of the wild food harvested by rural families is composed of fish (about 55% by weight), along with land mammals (22%), marine mammals (13%), birds (3%), shellfish (3%), and plants (4%) (Figure 3). Fish varieties include salmon, halibut, herring, and whitefish, among others. Seals, sea lions, walruses, and whales comprise the marine mammal harvest. Moose, caribou, deer, bears, Dall sheep, mountain goats, and beavers are commonly used land mammals, depending on the community and area. These rural subsistence (customary and traditional) harvests occur within a range of regulatory categories, including subsistence and general hunting, and subsistence, personal use, and rod and reel fishing.

### How Large is the Subsistence Harvest?

The subsistence and personal use food harvest by Alaska residents (about 39.4 million pounds) represents about 1% of the fish and game harvested annually in Alaska (Figure 4). This total represents all noncommercial harvests of wild food by residents of rural areas plus subsistence and personal use fish harvests by residents of nonsubsistence areas. Commercial fisheries harvest about 98% of the statewide harvest (about 3.5 billion pounds annually), while sport fishing and hunting (general hunting and sport fishing

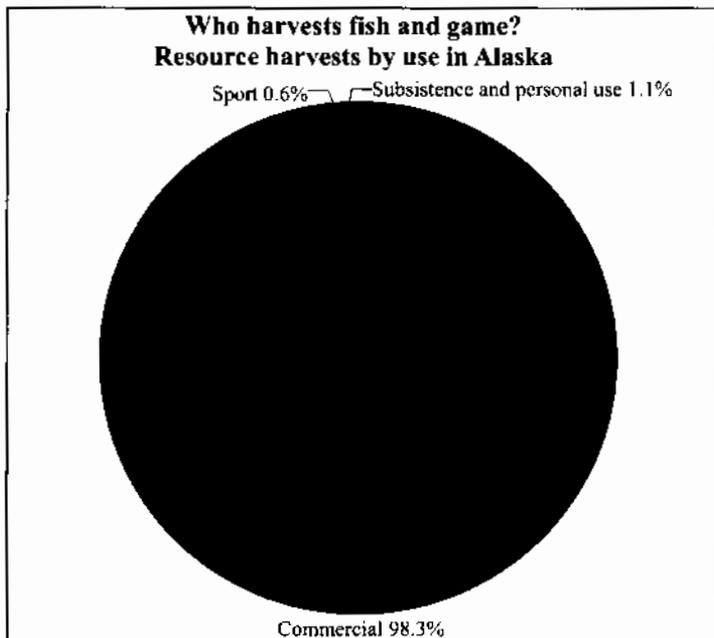


Figure 4

### Composition of subsistence harvest by rural Alaska residents, 2010

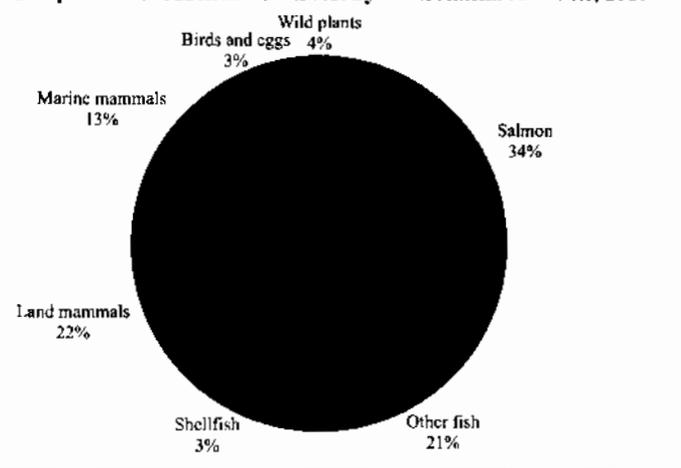


Figure 3

harvests by residents of Alaska nonsubsistence areas and all nonresident harvests) take 0.6% (21.3 million pounds).

Though relatively small in the statewide picture, subsistence fishing and hunting provide a major part of the food supply of rural Alaska (figures 5 and 6). Our best estimate is about 38.3 million pounds (usable weight) of wild foods are harvested annually by residents of rural areas of the state, and 13.8 million pounds by urban residents (Figure 6). On a per person basis, the annual wild food harvest is about 316 pounds per person per year for residents of rural areas (about 0.9 pounds a day per person), and 23 pounds per person per year for urban areas (Figure 5).

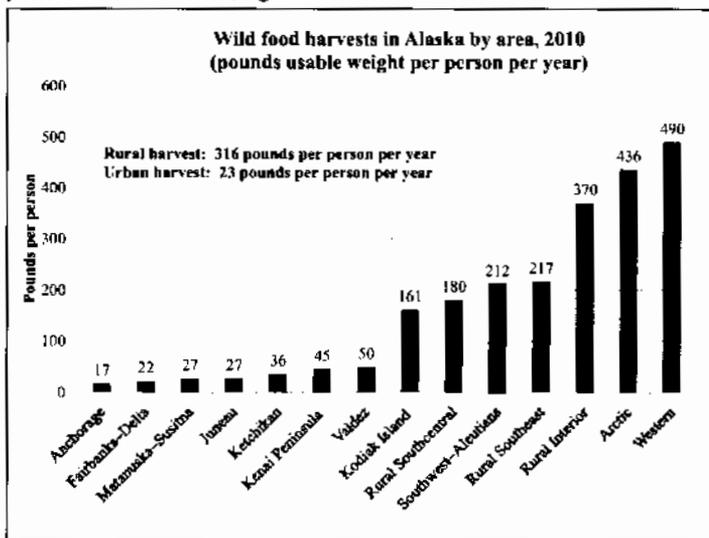


Figure 5

### Nutritional Value of Subsistence Harvests

The subsistence food harvest provides a major part of the nutritional requirements of Alaska's rural population, and lesser percentages in urban areas. The annual rural harvest of 316 pounds per person contains 185% of the protein requirements of the rural population (that is, it contains about 94 grams of protein per person per day; about 51 grams is the mean daily requirement (Figure 6). The subsistence harvest contains 31% of the caloric requirements of the rural population (that is, it contains about 698 Kcal daily, assuming a 2,250 Kcal/day mean daily requirement). The urban wild food harvests contain 14% of the protein requirements and 2% of the caloric requirements of the urban population (Figure 6).

## Wild food harvests in Alaska: Nutritional and replacement values

	Annual wild food harvest (pounds per person)	Annual wild food harvest (total pounds usable weight)	Percent of population's required:		Estimated wild food replacement value at \$3.50/pound	Estimated wild food replacement value at \$7/pound
			Protein (51 grams/day) (without plants)	Calories (2,250 calories/day) (without plants)		
<b>Rural areas</b>						
Southcentral	180	1,318,594	105%	18%	\$4,615,080	\$9,230,161
Kodiak Island	161	2,190,412	94%	16%	\$7,666,442	\$15,332,885
Southeast	217	5,828,786	125%	21%	\$20,400,751	\$40,801,503
Southwest-Aleutian	212	3,429,130	121%	21%	\$12,001,955	\$24,003,911
Interior	370	3,661,706	221%	36%	\$12,815,971	\$25,631,942
Arctic	436	10,592,409	257%	42%	\$37,073,432	\$74,146,863
Western	490	11,283,234	286%	48%	\$39,491,319	\$78,982,638
<b>Total rural</b>	<b>316</b>	<b>38,304,272</b>	<b>185%</b>	<b>31%</b>	<b>\$134,064,951</b>	<b>\$268,129,902</b>
<b>Urban areas</b>						
Ketchikan area	36	482,607	22%	3%	\$1,689,123	\$3,378,247
Juneau area	27	848,291	17%	3%	\$2,969,019	\$5,938,037
Matanuska-Susitna area	27	2,413,553	17%	3%	\$8,447,434	\$16,894,868
Fairbanks-Delta	22	2,247,598	13%	2%	\$7,866,595	\$15,733,189
Kenai Peninsula	45	2,435,992	27%	4%	\$8,525,972	\$17,051,943
Anchorage area	17	5,082,294	11%	2%	\$17,788,030	\$35,576,059
Valdez	50	200,247	31%	5%	\$700,864	\$1,401,728
Prudhoe Bay	23	50,788	14%	2%	\$177,758	\$355,516
<b>Total urban</b>	<b>23</b>	<b>13,761,370</b>	<b>14%</b>	<b>2%</b>	<b>\$48,164,794</b>	<b>\$96,329,587</b>
<b>Alaska total</b>	<b>73</b>	<b>52,114,490</b>	<b>43%</b>	<b>7%</b>	<b>\$182,400,714</b>	<b>\$364,801,428</b>

Figure 6

### Traditional Harvest Areas

Studies show that subsistence hunters, fishers, and gatherers in rural Alaska tend to harvest in traditional use areas surrounding their communities. Subsistence harvest areas are accessible from the community, although seasonal camps are used to access some species. Subsistence harvest areas for communities are definable and relatively predictable (Figure 7).

### The Monetary Value of Subsistence Harvests

Subsistence fishing and hunting are important to the rural Alaska economy. Attaching a dollar value to wild food harvests is difficult, since subsistence products do not circulate in markets. However, if families did not have subsistence foods, substitutes would have to be purchased. If one assumes a replacement expense of \$3.50-\$7.00 per pound, the simple "replacement value" of the wild food harvests in rural Alaska may be estimated at \$134-\$268 million dollars annually (Figure 6).

### Subsistence and Money

Subsistence is part of a rural economic system, called a "mixed, subsistence-market" economy. Families invest money into small-scale, efficient technologies to harvest wild foods, such as fishwheels, gillnets, motorized skiffs, and snowmachines. Subsistence food

production is directed toward meeting the self-limited needs of families and small communities, not market sale or accumulated profit as in commercial market production. Families follow a prudent economic strategy of using a portion of the household monetary earnings to capitalize in subsistence technologies for producing food. This combination of money from paid employment and subsistence food production is what characterizes the mixed, subsistence-market economies of rural areas. Successful families in rural areas combine jobs with subsistence activities and share wild food harvests with cash-poor households who cannot fish or hunt, such as elders, the disabled, and single mothers with small children.

### Dual Subsistence Management

Subsistence fishing and hunting in Alaska are regulated by the State of Alaska and the federal government, depending upon where the harvests occur. This system is called a "dual management system" because there are overlapping state-federal jurisdictions in many areas. The federal government regulates federal subsistence fisheries and hunts on federal public lands and federally-reserved waters in Alaska. The State of Alaska regulates state subsistence fisheries and hunts on all Alaskan lands and waters. A harvester should consult both the federal subsistence regulation booklet and the state subsistence fishing and general hunting regulations

## Angoon Deer Harvest Areas

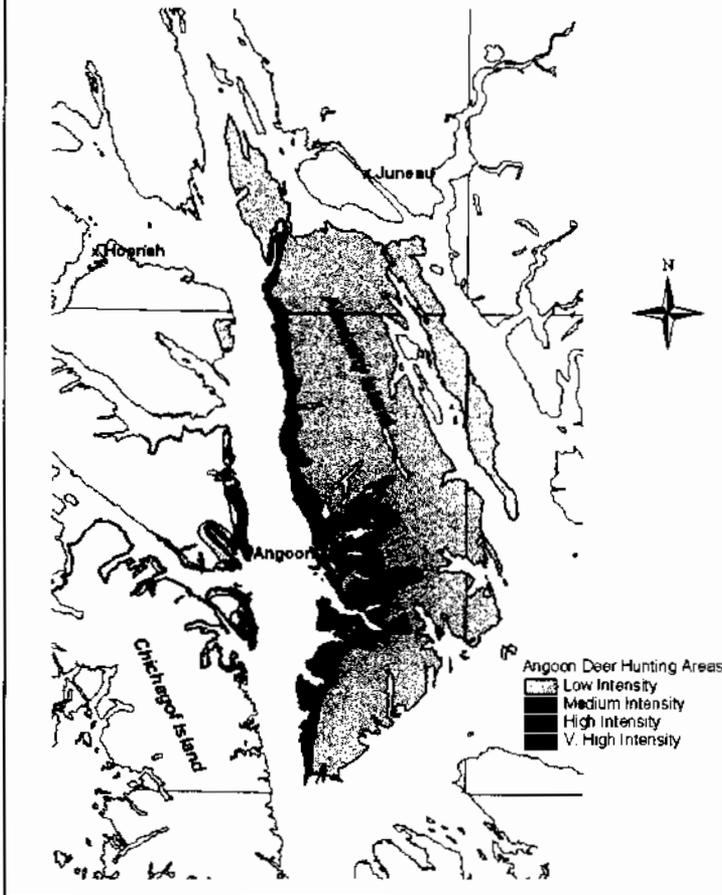


Figure 7

booklets, to be appraised of the complete set of hunting or fishing regulations in a particular area.

The Alaska Board of Fisheries and the Alaska Board of Game create regulations for state subsistence fisheries or hunts. The Federal Subsistence Board creates regulations for federal subsistence fisheries or hunts. In creating regulations, each board follows procedures for obtaining information and comments on proposed regulations from the public, agencies, and other interests.

Hunting of marine mammals is managed by the federal government through the National Marine Fisheries Service (seals, sea lions, and whales) or the U.S. Fish and Wildlife Service (polar bears, sea otters, and walrus). There is an exemption in the federal Marine Mammal Protection Act to allow for the traditional harvest and use of marine mammals by coastal Alaska Natives. Subsistence hunting of migratory waterfowl is managed by the U.S. Fish and Wildlife Service. Federal regulations limit participation to residents of designated rural areas. Subsistence fishing for Pacific halibut is managed by the National Marine Fisheries Service. Federal regulations limit participation to residents of designated rural areas and members of eligible tribes.

Subsistence hunting and fishing are restricted in non-rural areas of Alaska by the federal and state programs. Federal law allows subsistence harvests only by residents of rural areas. State law permits subsistence harvests by any Alaska resident in areas outside the boundaries of "nonsubsistence areas." The Alaska Joint Board of Fisheries and Game has determined that the areas around

Anchorage, the Matanuska-Susitna Valley, the Kenai Peninsula, Fairbanks, Juneau, Ketchikan, and Valdez are nonsubsistence areas, where fish and game harvests may be allowed under sport, personal use, or commercial regulations, but not under subsistence regulations. The Federal Subsistence Board has defined similar non-rural areas. Also, Prudhoe Bay is non-rural under federal rules.

### The Subsistence Priority

Subsistence uses of fish and land mammals are given a priority over commercial fishing and recreational fishing and hunting in state and federal law. This means that when the harvestable portion of a fish stock or game population is not sufficient for all public uses, subsistence uses are restricted last, by regulation.

By and large, urban fishers and hunters have not experienced major changes in harvest opportunities due to the subsistence priority. General hunting and sport fishing regulations continue to provide opportunities for residents and nonresidents. Personal use net fisheries provide for established food fisheries of urban residents in areas closed to subsistence fishing.

For example, during the eleven-year period when the rural priority was being implemented under state management (1978-1989), general resident hunting seasons for caribou increased by 36% (from 5,505 days to 7,500 days), moose hunting days decreased by 10% (from 2,961 days to 2,671 days), and Dall sheep hunting days increased by 2% (from 1,855 days to 1,900 days)—comparing the 1978-1979 resident season with the 1989-1990 resident season. That is, during this period, hunting days by urban hunters for caribou, moose, and sheep were not significantly changed by the rural subsistence priority.

The greatest effect of state and federal subsistence laws has been to legally recognize customary and traditional harvest practices and uses in rural areas. Because of the law, the Alaska Board of Fisheries and Board of Game and the Federal Subsistence Board have created subsistence regulations designed to provide opportunities for the continued harvest of the rural food supply. While impacts on urban residents have been relatively small, the benefits for rural areas have been great. Rural residents have a legally protected opportunity to fish and hunt to feed families following long-term customs and traditions.

*Original: Robert J. Wolfe, Division of Subsistence, ADF&G, March 2000; revised by James A. Fall, Division of Subsistence, ADF&G, January 2012.*

For a copy of the Alaska Department of Fish and Game OEO statement, see

<http://www.adfg.alaska.gov/index.cfm?adfg=home.oestatement>

# Proposal 45

- 5 AAC 92.200 Purchase and sale of game.
- Align state regulations on subsistence bartering with statutory authority provided at 16.05.930 (e).
- Department recommendation: AMEND AND ADOPT.

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# Statutory Authority: 16.05.930 (e)

- “This chapter does not prevent the traditional barter of fish and game taken by subsistence hunting or fishing, except that the commissioner may prohibit the barter of subsistence-taken fish and game by regulation, emergency or otherwise, if a determination on the record is made that the barter is resulting in a waste of the resource, damage to fish stocks or game populations, or circumvention of fish or game management programs.”
  - Page 69 of blue book.
  - In effect since 1978, when 16.05.930 was amended by adding this new section.



# Statutory Definitions: 16.05.940

- 16.05.940 (2) “barter” means the exchange or trade of fish or game, or their parts, taken for subsistence uses
  - (A) for other fish or game or their parts; or
  - (B) for other food or for nonedible items other than money if the exchange is of a limited and noncommercial nature.
    - Page 70 of blue book.
    - Barter does not involve cash – that would be “customary trade” defined at 16.05.940 (8).
    - Limited and noncommercial nature.

# 5 AAC 92.200

## **Current language**

(a) In accordance with AS 16.05.920(a) and 16.05.930(e), the purchase, sale, or barter of game or any part of game is permitted except as provided in this section.

## **Proposed language**

(a) In accordance with AS 16.05.920(a) and 16.05.930(e), the purchase, sale, or barter of game or any part of game is permitted except as provided in this section.

# 5 AAC 92.200

## Current language, continued

(b) Except as provided in 92.031, a person may not purchase, sell, barter, advertise, or otherwise offer for sale or barter:

## Proposed language, continued

(b) Except as provided in 92.031, a person may not purchase, sell, ~~barter~~ advertise, or otherwise offer for sale ~~or barter~~:

# 5 AAC 92.200

## Current language, continued

- (1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear;
- (2) a big game trophy, or a black bear trophy of any kind;
- (3) a big game animal skull, except the skull of a black bear, wolf, or wolverine, or a horn or antler that is still attached to any part of the skull;
- (4) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
- (5) unsealed marten taken in Units 1 - 7, and 15, except as provided in 5 AAC 92.170(a) ;
- (6) unsealed beaver taken in Units 1 - 11 and Units 13 - 17;
- (7) unsealed land otter, lynx, wolf, or wolverine;
- (8) the meat of big game and small game, except hares and rabbits ; however, caribou may be bartered in Units 22 – 26, but may not be transported or exported from those units;
- (9) the gallbladder of a bear.

## Proposed language, continued

- (1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear;
- (2) a big game trophy, or a black bear trophy of any kind;
- (3) a big game animal skull, except the skull of a black bear, wolf, or wolverine, or a horn or antler that is still attached to any part of the skull;
- (4) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
- (5) unsealed marten taken in Units 1 - 7, and 15, except as provided in 5 AAC 92.170(a) ;
- (6) unsealed beaver taken in Units 1 - 11 and Units 13 - 17;
- (7) unsealed land otter, lynx, wolf, or wolverine;
- (8) the meat of big game and small game, except hares and rabbits ; ~~however, caribou may be bartered in Units 22 – 26, but may not be transported or exported from those units;~~
- (9) the gallbladder of a bear.

# 5 AAC 92.200

## Current language, continued

[none – new language]

## Proposed language, continued

(c) A person may not barter, advertise for barter, or otherwise offer for barter:

- (1) a big game trophy, or a black bear trophy of any kind;
- (2) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
- (3) the gallbladder of a bear.

# 5 AAC 92.200

## Current language, continued

- (c) Notwithstanding (b)(2) and (b)(3) of this section, a licensed taxidermist, estate executor, or bankruptcy referee, may sell a skin or trophy by permit issued under 5 AAC 92.031, and the state will, in its discretion, sell a skin or trophy as excess property. A person may purchase and possess an animal skin or trophy sold under this subsection. However, no person may resell a skin or trophy purchased from a seller under this subsection.

## Proposed language, continued

- ~~(c)~~(d) Notwithstanding (b)(2) and (b)(3) of this section, a licensed taxidermist, estate executor, or bankruptcy referee, may sell a skin or trophy by permit issued under 5 AAC 92.031, and the state will, in its discretion, sell a skin or trophy as excess property. A person may purchase and possess an animal skin or trophy sold under this subsection. However, no person may resell a skin or trophy purchased from a seller under this subsection.

# 5 AAC 92.200

## Current language, continued

- (d) A person who engages in fur dealing, as defined in AS 16.05.940 , and who purchases or acquires, through consignment or barter, the raw skin of a furbearer or fur animal, shall report the transaction to the department on a form provided for this purpose, within 30 days after the last day of the month during which the transaction occurred.

## Proposed language, continued

- ~~(d) A person who engages in fur dealing, as defined in AS 16.05.940 , and who purchases or acquires, through consignment or barter, the raw skin of a furbearer or fur animal, shall report the transaction to the department on a form provided for this purpose, within 30 days after the last day of the month during which the transaction occurred.~~

# Amended Proposal in Entirety

- a. In accordance with AS 16.05.920(a) and 16.05.930(e), the purchase, sale, or barter of game or any part of game is permitted except as provided in this section.
- b. Except as provided in 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale:
  - 1) any part of a brown bear, except an article of handicraft made from the fur of a brown bear;
  - 2) a big game trophy, or a black bear trophy of any kind;
  - 3) a big game animal skull, except the skull of a black bear, wolf, or wolverine, or a horn or antler that is still attached to any part of the skull;
  - 4) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
  - 5) unsealed marten taken in Units 1 - 7, and 15, except as provided in 5 AAC 92.170(a) ;
  - 6) unsealed beaver taken in Units 1 - 11 and Units 13 - 17;
  - 7) unsealed land otter, lynx, wolf, or wolverine;
  - 8) the meat of big game and small game, except hares and rabbits ;
  - 9) the gallbladder of a bear.
- c. A person may not barter, advertise for barter, or otherwise offer for barter:
  - 1) a big game trophy, or a black bear trophy of any kind;
  - 2) the antler of a caribou taken in Unit 23, unless the antler is a naturally shed antler or has been made into an article of handicraft;
  - 3) the gallbladder of a bear.
- d. Notwithstanding (b)(2) and (b)(3) of this section, a licensed taxidermist, estate executor, or bankruptcy referee, may sell a skin or trophy by permit issued under 5 AAC 92.031, and the state will, in its discretion, sell a skin or trophy as excess property. A person may purchase and possess an animal skin or trophy sold under this subsection. However, no person may resell a skin or trophy purchased from a seller under this subsection.

Questions?

RC 18

## SCIENTISTS' STATEMENT ON BEAR SNARING IN ALASKA

Presented to the Alaska Board of Game

January 13, 2012  
Anchorage, Alaska

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Bears are usually snared by hanging a bucket of bait in a tree. When a bear reaches into the bucket for the bait, its front leg is caught (trapped) by a cable attached to the tree. The only way the bear can be released by the hunter/trapper is by shooting it. If a female with first year cubs is snared and killed, the cubs will most likely starve or be killed by another bear.

Unlike hunting, where a hunter can carefully select for large, male bears, snaring is indiscriminate. Snares catch black bears and brown bears, female bears with cubs, and sometimes even older cubs. With unlimited numbers of snares and long open seasons, snaring may kill more bears than is sustainable.

**Snaring and killing of bears regardless of age, species, and gender is incompatible with the scientific principles and the ethics of modern wildlife management including the North American Model for Wildlife Conservation. \***

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\* see Shane Mahoney's essay on the North American Model in the Rocky Mountain Elk Foundation's Bugle: <http://www.rmef.org/NewsandMedia/PubsTV/Bugle/2004/SepOct/Features/SevenSisters.htm>

Submitted by: John Schoen

## Scientists Supporting Bear Snaring Statement

### (Scientists with Alaska Bear Research & Management Experience)

Steven Amstrup, Ph.D.  
USGS, Retired  
Kettle, Falls Washington

Larry Aumiller  
ADF&G, Retired  
Missoula, MT

Jerrold Belant, Ph.D.  
Mississippi State University  
Starkville, MS

Vic Barnes, M.S.  
USFWS, Retired  
Westcliffe, CO

Fred Dean, Ph.D.  
UAF, Retired  
Fairbanks, AK

Terry DeBruyn, Ph.D.  
Anchorage, AK

Anthony Fischbach, M.A.  
Anchorage, AK

Scott Gende, Ph.D.  
Juneau, AK

Michael Goldstein, Ph.D.  
Juneau, AK

John Hechtel, M.S.  
ADF&G, Retired  
Fairbanks, AK

Richard Hensel, M.S.  
USFWS, Retired  
Anchorage, AK

David Klein, Ph.D.  
UAF, Retired  
Fairbanks, AK

Jack Lentfer, M.S.  
USFWS / ADF&G, Retired  
Homer, AK

Colleen Matt, M.S.  
ADF&G, Retired  
Missoula, MT

Sterling Miller, Ph.D.  
ADF&G, Retired  
Missoula, MT

John Neary  
Juneau, AK

Elizabeth Peacock, Ph.D.  
Anchorage, AK

Harry Reynolds, M.S.  
ADF&G, Retired  
Fairbanks, AK

Scott Schliebe, M.S.  
UWFWS, Retired  
Anchorage, AK

John Schoen, Ph.D.  
ADF&G, Retired  
Anchorage, AK

Chuck Schwartz, Ph.D.  
ADF&G, Retired  
Bozeman, MT

Richard Sellers, M.S.  
ADF&G, retired  
Lewistown, MT

Rick Sinnott, M.S.  
ADF&G, Retired  
Chugiak, AK

Roger Smith, M.S.  
ADF&G, Retired  
Kodiak, AK

Tom S. Smith, Ph.D.  
Brigham Young University  
Provo, UT

Derek Stonorov, M.S.  
ADF&G, Retired  
Homer, AK

Lowell Suring, M.S.  
US Forest Service, Retired  
Boise, ID

Will Troyer, M.S.  
USFWS / NPS, Retired  
Cooper Landing, AK

### (Scientists with general Alaska Wildlife Experience)

Theodore Bailey, Ph.D.  
USFWS, Retired  
Soldotna, AK

Julia Bevins, Ph.D.  
Anchorage, AK

Terry Bowyer, Ph.D.  
Idaho State University  
Pocatello, ID

Terry Chapin, Ph.D.  
UAF  
Fairbanks, AK

John Coady, Ph.D.  
ADF&G, Retired  
Fairbanks, AK

Bruce Conant  
USFWS, Retired  
Juneau, AK

Lenny Corin, M.S.  
USFWS, Retired  
Oak Harbor, WA

Christian Dau, M.S.  
Wasilla, AK

Tony DeGange, M.S.  
Chugiak, AK

Steve DuBois  
ADF&G, Retired  
Delta Junction, AK

Glenn Elison, M.S.  
USFWS, Retired  
Anchorage, AK

Jeff Fair, M.S.  
Palmer, AK

Kathy Frost, M.S.  
ADF&G, Retired  
Kona, HI

Robert Gill, M.S.  
Anchorage, AK

Colleen Handel, Ph. D.  
Anchorage, AK

Thomas A. Hanley, Ph.D.  
Juneau, AK

Ted Heuer, MS  
USFWS, Retired  
Homer, AK

Jack Hodges, M.S.  
Juneau, AK

Mimi Hogan, M.S.  
USFWS, Retired  
Anchorage, AK

Jeff Hughes, M.S.  
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Joseph Mazzoni  
USFWS, Retired  
Rancho Murrieta, CA

Rosa, Meehan, Ph.D.  
Anchorage, AK

Bob Nelson  
ADF&G, Retired  
Kealahou, HI

Richard Pospahala, M.S.  
USFWS, Retired  
Newman Lake, WA

Patricia Reynolds, Ph.D.  
Fairbanks, Alaska

John Rogers, Ph.D.  
USFWS, Retired  
Laurel, MD

Thomas Rothe, M.S.  
ADF&G, Retired  
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Karl Schneider, M.S.  
ADF&G, Retired  
Homer, AK

Jerry Stroebel  
USFWS, Retired  
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Ted Swem, M.S.  
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Nancy Tankersley, M.S.  
ADF&G / USFWS, Retired  
Anchorage, AK

Lee Tibbitts, M.S.  
Anchorage, AK

Eric Taylor, Ph.D.  
Eagle River, AK

Nils Warnock, Ph.D.  
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Bob Weeden, Ph.D.  
UAF, Retired  
Salt Spring Is, B.C.

Dan Wetzel  
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Barry Whitehill  
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Fairbank, AK

Ken Whitten, M.S.  
ADF&G, Retired  
Fairbanks, AK

Mary Willson, Ph.D.  
Juneau, AK

John Wright, M.S.  
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Vic Van Ballenberghe, Ph.D.  
US Forest Service, Retired  
Anchorage, AK

Jay Ver Hoef, Ph.D.  
Fairbanks, AK

Steven T. Zimmerman, Ph.D.  
NOAA/NMFS, Retired  
Juneau, AK

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## **TONY KNOWLES STATEMENT TO BOARD OF GAME ON BEAR SNARING**

**January 13, 2012**

**As a rookie governor I turned to Jay Hammond to ask his advice on how to use my time to be the most effective. His short reply was "you can plan whatever you want but 75% of your time will be on fish and game matters." From negotiating the first successful Pacific Salmon treaty with Canada in a generation, to three special sessions with the legislature on trying to resolve subsistence, to the North Pacific Fisheries Management Council, and a multitude of other fish and game issues across the state, the plate was always full. I think Jay may have understated the percent of time involved.**

**It was all time well spent as Alaska has one of the world's most abundant and diverse arctic wildlife species in our oceans, rivers and on land. They represent a resource that enriches our lives immeasurably. It is a source of our economic prosperity, our culture, our identification with the place that we love, and food on our dinner table. And that's why our Constitution requires us to carefully manage our harvest and care of these resources so that they may be always sustainable for future generations.**

**Of course Alaskans are passionate about their opinions on how these resources should be handled and there are as many strong opinions as there are people. However I believe most Alaskans agree on three overarching principles.**

- 1) The resource, owned by all the people of Alaska, always comes first.**
- 2) Policies should be based on the best science available and ethical practices.**
- 3) Policies should have broad public support.**

**Bear snaring, never before legal in the State of Alaska, is now being used by the State as a predator-control method to kill Black and Grizzly bears in some areas and it appears the Board of Game is considering proposals to open up parts of Alaska to routine bear snaring by trappers. Bear snaring is a killing technique that indiscriminately takes both Black and Grizzly bears, sows, sows with cubs, and older cubs. It violates all of the three overarching principles.**

**An unprecedented number of Alaskan scientists and professional wildlife managers representing approximately 1,600 years of Alaskan wildlife management experience, made the following statement about this practice and proposed policy. "Snaring and killing of bears regardless of age, species, and gender is incompatible with the scientific principles and ethics of modern wildlife management..."**

**I agree with that statement. I believe that the vast majority of Alaskans will also agree and reject the indiscriminate killing of Black and Grizzly bears by the unscientific and unethical policy of bear snaring. It is my request that the Board of Game abolish this policy and take the first step to return the wildlife management policies of Alaska to a national model of science, ethics, and sustainability.**



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*Protecting Our National Parks for Future Generations*

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### Testimony of Jim Stratton

Alaska Regional Director - National Parks Conservation Association

Alaska Board of Game

January 13, 2012

Good Morning Mr. Chair, members of the board. My name is Jim Stratton and I am the Alaska Regional Director for the National Parks Conservation Association. NPCA is a national membership organization working to protect our national parks for future generations. We have over 1,000 members in Alaska and 340,000 across the country and it is the very opportunity for these members and all Americans to know that national preserves in Alaska support healthy populations of wolves and brown bears living in intact and functioning ecosystems that brings me before you today.

I appreciate the opportunity to comment on seven proposals we submitted that address the conflict between the state's Intensive Management strategy and Congressional direction for how wildlife is to be managed on lands managed by the National Park Service. We also encouraged our members in Alaska and five other western, hunter-friendly states to submit their comments as well directly to the Board.

I would like to say from the very beginning today that NPCA's proposals are NOT challenging the state's Intensive Management laws. We fully understand that Intensive Management is the direction given to the Board of Game by the Alaska legislature and barring any conflicting directives from federal land management agencies, it is how wildlife is managed on federal lands in Alaska as well. The key words being "barring any conflicting directive." NPCA and the National Park Service have repeatedly pointed out where state regulations DO conflict and have requested numerous modifications in proposed regulatory actions or that NPS lands be exempt. I have documented over 52 times in the past 11 years where the Board ignored a change or exemption request from the National Park Service to a conflicting regulation that was adopted by the Board. And in each of the proposals we are supporting today, the Park Service has previously asked for either a change or that their lands be exempt, only to be ignored by the Board. Let's explore a bit of the Congressional authority behind this conflict.

Sport hunting as provided for by the Alaska Lands Act in national preserves is not absolute and comes with some restrictions as found in Section 1313:

*A National Preserve in Alaska shall be administered and managed as a unit of the National Park System in the same manner as a national park ... except that the taking of fish and wildlife for sport purposes ... shall be allowed in a national preserve under applicable State and Federal law and regulation.*

The key words here are "in the same manner as a national park" and "under applicable state and federal law and regulation."

Intensive Management is based on the finding that “providing for high levels of harvest for human consumption...is the highest and best use of identified big game prey populations in most areas of the State...” If those populations are depleted, then the board takes action to control predators. That control, however, isn't just limited to establishing Predator Control Areas, which we recognize preclude NPS lands. Our concern is with the more subtle attempts to reduce wolf and bear populations by extending seasons, providing for opportunistic bear hunting by eliminating the need for a bear tag, increasing the bag limit and embracing a bundle of hunting methods and means that were solely adopted by this board to increase hunter success for wolves and bears. Our seven proposals submitted for the Board's consideration ask that only lands managed by the National Park Service be exempt from certain hunting methods and means.

For example, in 2008 the Board adopted a regulation providing for the use of artificial light for taking black bear cubs and sows with cubs at dens in Unit 19D and Unit 24, which includes portions of Denali and Gates of the Arctic National Preserves. In reviewing the artificial light proposals, terms used to justify the regulation such as “manage bear predation” make it clear the request was solely to control black bear populations. Such manipulation of wildlife populations is fundamentally in conflict with national park service Management Policies which read in Section 4.4.2 that

*The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service.*

At the Spring 2010 meeting, the National Park Service specifically requested that its lands be exempt from this spotlighting regulation and was told by the Board that if NPS had a problem with that hunting method, they should address it in their regulations – which they subsequently did.

Contrary to the action this board forced NPS to take in 2010, NPCA advocates that any exceptions to state hunting rules for NPS managed lands be included in state, not federal, regulations, making it far easier for the hunting public to comply with federal and state harvest rules.

With this basic premise in mind – keeping NPS-specific hunting rules and exemptions in state regulation and listed in the official State of Alaska hunting regulation guide - the National Park Conservation Association asks the Board of Game to support proposals:

- 48 – Prohibits the purchase and sale of game meat on NPS lands;
- 93 – Prohibits the taking of big game under a trapping license solely using a firearm on NPS lands;
- 94 – Prohibits trapping during denning months on NPS lands;
- 97 – Prohibits the use of artificial light for taking game on NPS lands;
- 108 – Prohibits the harvest of cubs and sows with cubs on NPS lands;
- 121 – Prohibits baiting and the use of scent lures for black bears on NPS lands;
- and 126 – Prohibits trapping or snaring black bears on NPS lands.

Thank you.