

# ALASKA

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Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January board meeting in Juneau. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are inline with the principles of sustained yield and result in a maximum benefit of ALL users. The APHA maintains it support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests all Alaskans.

### **Carry Over Comments from the 2014 Board of Game Cycle:**

*"The APHA is in strong support of the Board and Department's efforts to form a sheep-working group. We feel strongly that this group should incorporate voices from stakeholders across the state. To this effect, we request that hunting guides are considered "stakeholders" and that persons responsible for the formation and implementation of this group are provided information to this effect. We maintain our participation in this group is historically justified and that our knowledgeable perspective will be essential to its ultimate success. We see the goal of the working group as:*

***to have a robust discussion, in a think-tank format, that presents current understandings of sheep biology and sheep harvest information (Alaska) to a group of diverse, knowledgeable Alaskan stakeholders who incorporate their perspectives in the drafting of a statewide sheep management plan that relies on a set of pre-determined, agreed upon, management tools the Board of Game shall adopt to achieve the goals and objectives the group sets' for a sustainable future for Alaska sheep hunting.***

*We strongly suggest that the management tools include not only “stop-gap” measures to conserve the resource but, given abundance, opportunity liberalizations as well. Alaska’s final sheep management plan should be made easily available to the public and then allowed to run its course for 10 years before it is revisited. Our 10-year recommendation is based on recognition of the need for biological and social compromise. First, we considered the cyclical nature of Alaska’s game populations and our northern latitude that can retard the effects of management changes (up to 20+ years). It is quite probable that ten years will be an insufficient timeline to measure the full biological effects, on a statewide basis, of a new management strategy. Second, we believe that given Alaska’s current rate of population growth and the short average length of residency, 10-years will be about as long as the public will understand and accept the working group’s results. We feel that the 10-year goal is a good compromise that allows for public re-appraisal while giving new management practices some time to run their course. The recent reappraisal and subsequent validation of the Unit 4 Brown Bear Management Plan (January 2013, Sitka BOG meeting) is an excellent example of the net positive effects this type of working group can have for the resource and the surrounding social climate. The Sheep working group is a timely project and has our strong support.*

*As you consider our positions we urge you to keep in mind that Alaska’s professional guide industry represents a significant and important economy in rural Alaska. In addition to the “new dollars” the guide industry brings to rural Alaska and the private sector at large, our client’s tag and license purchases directly and indirectly, through matching Federal funds, provide the “lion’s share” of ADF&G’s funding. The health of our industry is dependent upon prudent stewardship and conservation of Alaska’s wildlife as well as fair allocation. It is precisely because of our stewardship principles and respect for all users and a fair allocation process that our members maintain deep community ties across our vast State. Alaska’s professional hunters ask that when you consider the below comments you remain mindful that its in our best interest to have abundant game as well as a healthy, inclusive social situation that is in the best interests of ALL Alaskan’s.”*

## **Individual Proposal Comment**

Below you will find our comments on individual proposals under your consideration for Region I. Leading up to the drafting of these comments the APHA held a tele-conference and invited all of its members to participate in the drafting of these comments. This tele-conference was well attended with good representation from guides who conduct hunts in Region I. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or that are outside of the groups purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge and experience to table.

### **Sheep Proposals:**

#### **Proposals #109,110 & 112-124**

We oppose all of the above proposals that seek to restrict non-resident sheep hunters. These proposals lack a conservation perspective and are strictly allocative in nature.

#### **Proposal #106,107- Discussion**

These proposals are brought forward from a conservation perspective, therefore merit discussion. They should be addressed outside of the proposals based on social conflicts and allocation. There is strong consensus among APHA members relating to there being an overall conservation concern with sheep in Alaska but there are disagreements about the weight of the variety of factors. We would encourage the Board to act on this proposal weighted towards the more conservative management of the resource at this time. With sheep numbers at or near historic lows, conservative management of the resource is warranted. APHA defers its position to the good judgment of the area's managers and the boards experience valuing the resource.

## **Proposal #111**

The Alaska Backcountry Hunters (AKBH) suggest that areas without guide concessions require non-resident draw to get to an acceptable allocation and success rate for resident hunters. We have chosen to address Proposal 111 independent of the other sheep proposals because it highlights a conservation concern (the hypothesis that not all of the mature rams can be harvested from the population each year) while, at the same time, providing data to support the positive value of Guide Concessions from a resident-allocation perspective.

For clarity: it is impossible for a guide to plan or run a guide business when he does not know what kind or how many hunts he has the opportunity to sell. Random drawing hunts destabilize and cripple responsible, ethical guides from offering sustainable hunting opportunities. However, defined limitations on non-resident hunters are not necessarily damaging where a guide has a concession, for a finite duration (say 10 years), with a predictable number and type of hunts to offer and capitalize on. Alaska's guide businesses are almost wholly Alaskan owned and operated. Random draw hunts have allowed technology savvy entities to "stuff the box" and effectively control how Alaska's game resource is marketed and who benefits from it. While "guide client agreements" help preserve Alaska resident guides' inherent quality advantages, they are insufficient, in themselves, to prevent sophisticated drawing application services from controlling and effectively owning the resource. **Simply put; the APHA cannot support random draw hunts without concessions being put in place first because of the loss of viability for guide businesses and a loss of Alaskan ownership of the resource.**

While we agree with AKBHA's that guide concessions are absolutely positive for resident hunters and will benefit the resource, we disagree that non-resident sheep draws are the "silver bullet" to fix sheep hunting without concessions. We would encourage the AKBHA to bring this data, showing the positive effects of guide concessions on resident hunting opportunity, to the legislature in support of the Guide Concession legislation. We would also encourage AKBHA to assert itself as a "stakeholder" and for the Department to include them in the sheep working group membership.

***We recognize that this proposal raises a conservation question (hypothesis) and that it is not strictly allocative in nature but we disagree***

***that the proposed solution will get the most desirable results for Alaskans.***

**Proposal #207- Oppose**

This is a non-allocative and non-conservation based issue, and can be very divisive. We would encourage the board to stay focused on working on the more important issues of crowding, allocation and conservation through a sheep-working group.

**Proposal #208- Discussion**

We would like to thank the Board for putting this proposal out for discussion. At this time the APHA is unable to develop a strong internal consensus on the variety of options that a proposed here. However, as a result of discussion prompted by this and proposal #207, we have been able to develop strong consensus in some areas:

**Conservation:**

APHA members, broadly, think we have real conservation concerns with sheep in Alaska. This is a point of strong consensus.

**Resident Draw/Crowding:**

The APHA is ABSOLUTELY OPPOSED to any form of resident draw to address crowding, no matter how short.

**State Land/Federal Land:**

APHA members agree that the conflicts over allocation differ depending on whether we are talking about state or federal land. Proposal 208 recognizes that difference.

**Guide Concessions:**

The APHA maintains that the allocation imbalances and social conflicts that are motivating the authors of proposals #109-124 and proposal #207-208 are a direct result of an unlimited number of Big Game Commercial Services that can operate on State Land. Aside from improving sheep numbers, ADFG and the Board of Game can only treat the symptoms of problem.

**Sheep Working Group:**

The APHA maintains absolute positive support for a *Sheep Working Group*. This is the only type of format that we can work together to not only manage the

resource and hunters but set goals and desired outcomes for the actions of the board, both now and in the future. Sheep and sheep hunting are worth our effort. *(see above comments from past BOG cycles further defining our position)*

#### **Proposal #44- Oppose**

We oppose this proposal based on a conservation concern. Bull:Cow ratios are a critical aspect of moose management and the ratios in 9B are BELOW management objectives. Additional bull harvest will exacerbate this imbalance, threatening the health of the herd. Additional bull harvest in 9B is not warranted at this time.

#### **Proposal #45- Oppose**

We oppose the expansion and liberalization of Brown bear hunting seasons in 9B because there are real indications of a stable to declining population of bears. While Brown Bears are significant predators of moose calves, increasing bear harvest should be based on hunter opportunity and management of the bears themselves, not the potential for saving moose calves. The APHA supports IM programs and for this reason opposes liberalizing sport seasons with the stated intent of "predator control."

#### **Proposal 46- Support**

For all intensive purposes, Unit 10 is an extension of the Alaska Peninsula. We support this proposal because it aligns Unit 10 season dates with Unit 9. All of Unit 10 brown bears are managed on a drawing hunt system (Unit 9 is over the counter) therefore this extension will not result in additional hunter effort. There may be small increase in success rate, more days to hunt, but there is no threat of this small increase causing a conservation concern with the number of tags currently issued. Even if 100% of the tags were utilized which they are not, we do not see a conservation concern with Prop. 46, therefore it will result in more sustainable opportunity.

#### **Proposal #49- Support**

We support proposal this proposal based on the Departments comments and justifications for bringing it forward.

### **Proposal #50-Support-Ammend**

We support issuance of Unit 17 Registration Moose tags in Dillingham, Iliamna and Port Alsworth. Currently these tags are undersubscribed and it is an unnecessary financial hardship to fly to Dillingham to get these tags. We support a cost effective compromise to the proposal that excludes small villages from communities that ill issue these permits. This will reduce the administrative costs of expanding communities of issuance AND save the public money. We anticipate that this scenario is a net gain; costing the department a very small amount of money to administer, while saving the public significant transportation cost. Our members will more profitably access and participate in a opportunity expressly provided to them.

### **Proposal #52- Support**

We strongly support this proposal because it provides for more non-resident opportunity without any conservation concerns. However we are sensitive to the potential for social conflict in rural Alaska, especially were hunting is conducted close to villages. We see this proposal is being sensitive to the social concerns while seeking clarification and definition of areas identified as areas of with a high potential for localized high harvest. Because this is a reasonable request and will result in more non-resident opportunity with no conservation concerns, we ask that you pass as written.

### **Proposals #58- Oppose**

Prop. 58 will make it harder to achieve moose population goals within Unit 13, therefore we strongly oppose this proposal.

### **Proposal #61- Support**

DM335-339 are chronically undersubscribed with a fair portion of the harvestable surplus not being utilized. This is not uncommon for a drawing hunt system; in fact this is a widespread issue with these types of hunts statewide. From a guide's perspective, it is very frustrating to have non-resident allocation in an area that he or she is registered for but not actually able to utilize that opportunity, year in and year out. We would like the board to consider the changes in this proposal or develop some other scheme to allow for the

opportunity and allocation provided for to be utilized. Certainly breaking out part of the draw for "Guided non-resident" with the UVC Code requirement for application is also an excellent option. The APHA supports solving the problem identified by proponent of proposal #61.

**Proposals #90- Support (additional discussion/background in comment on Prop. #91)**

We support this proposal as written but we would preferre that 13D be evenly divided into three separate registration hunts.

While there may be additional cost to managing this population (surveys, harvestable surplus, permit administration) we feel that is the responsibility of the managers. However, we are confidant that members of our association or members of the general public interested in goat hunting, would do what they could to help the department set harvest objectives and identify issues that could lead to future conservation concerns (access points, anecdotal population observations, education of nanny harvest). There are quite a few examples of successfully managed goat hunts, using registration permits, across the state. We support this proposal and encourage the department to save costs by working with the long time users of the resource in the Unit who have a vested interest in a health goat herd and predictable opportunity.

**Proposal #91- Oppose- Amend**

We support the changes proposed to the Unit 13 portions of RG580 but we **OPPOSE applying these changes in Unit 11.** The small portion of unit 13D in discussion in this proposal should most likely be incorporated into the large registration areas proposed in our comments on Prop. #90.

Registration goat hunts always have the potential for localized depletion of the more accessible population; thus are subject to emergency closure provisions. Unit 13 is State Land with an UNLIMITED number of Registered Guides who can register and operate within its boundaries. Unit 11 is mostly Federal Land, with guide numbers being limited by Federal Concessions. There is a potential to locally deplete the goats in the 13D portions managed under RG580 and cause an emergency closure to ALL goats in Unit 11 because they are administered by the same hunt.

Any liberalizations to goat seasons in units like 13D that are wholly State Land



should be separated and distinct from Federal Units because an unlimited number of Big Game Commercial Services will always have the potential to cause conservation concerns. These conservation concerns can develop rapidly. Where Big Game Commercial Services are limited in their overall number, conservation concerns develop much, much slower, giving managers time to respond outside of emergency authority.

### **Proposal #97- Oppose**

Harvest goals are being met, this opportunity therefore requires a reallocation of the resource that we do not support at this time.

### **Proposal #108- Support-Amend**

**The Alaska Professional Hunters' Association is asking the Board to extend the delay of the repeal of the guide-client contract requirement for one more year, until July 1<sup>st</sup> of 2016. We want to make a state-wide proposal that covers all of these issues that would be heard by this Board of Game in March of 2016 at the state wide meeting.**

### **Discussion:**

During the March, 2014 state wide meeting in Anchorage, this Board of Game voted to adopt proposal 146, submitted by the Department of Fish and Game. This proposal repealed the requirement for a non-resident hunter to have a signed Guide-Client Contract in place before they could apply for any draw permit hunt that these contracts had been required in. The Board amended the proposal to leave this requirement in place for Kodiak and Afognak Island (Unit 8) and repealed it everywhere else. The Board also delayed implementation of this repeal until July 1, 2015. With delaying the action on this proposal the Board urged the Department of Fish and Game, the Department of Commerce, Community and Economic Development (which licenses the guides), and the Big Game Commercial Services Board (which regulates them) to find an easy way for the Dept. of Fish and Game to verify that a guide is in fact registered for the guide use area where the hunt would take place. The Department of Fish and Game has worked with the Department of Commerce and the Big Game Commercial Services Board to do this. During the last draw application period, all guides were required to get a Unique Verification Code (UVC) before the application period started. This UVC number is issued by the Dept. of Commerce to a guide only after the BGCSB staff has confirmed that the guide is in fact registered for the guide use area in which the hunt will take place both at the time of application and for the year in which the hunt would take place. The

Dept. of Fish and Game does not have to verify the stipulations or terms required to get a UVC code, only that the UVC code exists. Working with the Dept. of Fish and Game and the Department of Commerce, the Alaska Professional Hunters Association is comfortable that this a good solution to the problems which the Department of Fish and Game had noted in their proposal to repeal the requirement.

**Proposal #125- Oppose**

We oppose this based on conservation concerns combined with the required reallocation of the resource. Bow hunting is not excluded or prohibited during rifle season. The choice of weaponry should not result in special treatment or a special allocation of the resource. Use of primitive weaponry is, by definition, a "choice." Providing an allocation to this use, especially for animals such as moose or caribou, may make the use of bows necessary to secure opportunity.

**Proposal #135-137- Oppose**

These proposals are poorly thought out and in a couple of instances actually act counter to the intent of the authors. We ask that you reject these proposals because they ask for something different than they propose. As an example: proposal 137 quotes harvest rates that are in error, while mischaracterizing the constitution and subsequent case law.

**Proposal #210- Neutral**

Guides are already restricted to the use "lawful methods" for retrieval of wounded game. As written this proposal will have no impact on what methods a guide can use to retrieve wounded game.