Documents to accompany Stony Holina F&G Advisory Committee Testimony

1. ACR 1 & Proposal 165—mistakes & incorrect statements are highlighted
3. “Using Harvestable Surplus to Build Herds”- includes some GMU 19 ANS reset in 2006
4. SHAC hunt condition recommendations for a low harvest experimental Tier I registration hunt
5. Support info for a GMU 19A split into 2 new subunits.

List of AC, PC, & RC comments on Proposal 165

Some of the ACs were unclear of where SHAC stands, and so, on whether supporting or opposing ACR 1 / proposal 165 would be supportive of SHAC’s position.

AC-02 Bethel AC — from 10/3/17 & 10/23/17 AC meetings — Support 165
RC-007 Bethel AC- from 2/13/18 meeting- Oppose 165

AC-04 CKAC – from 10/23/17 meeting – Support 165 –
AC-20 LKAC – from 10/23/17 meeting – Support 165
AC-22 McGrath AC – from 10/03/17 meeting - Oppose ACR 1 & 165
PC-01 Alaska Outdoor Council comments
PC-50 Sleetmute Traditional Council – Oppose 165

Submitted by Doug Carnig
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List of AC, PC, & RC comments on Proposal 165

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AC-04 CKAC - from 10/23/17 meeting – Support 165 –
AC-20 LKAC – from 10/23/17 meeting – Support 165
AC-22 McGrath AC – from 10/03/17 meeting - Oppose ACR 1 & 165
PC-01 Alaska Outdoor Council comments
PC-50 Sleetmute Traditional Council – Oppose 165

Submitted by Doug Carnegie
ACR 1 – Open a registration hunt for moose in Unit 19A.
SUBMITTED BY: Henry Hill
CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.
5 AAC 85.045. Hunting seasons and bag limits for moose.
WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN
DETAIL THE NATURE OF THE CURRENT PROBLEM. The closure of Unit 19A above the
George River to moose hunting. The fish and game survey of spring 2017 show there is a harvestable
population for the first time since the closure in 2006.
WHAT SOLUTION DO YOU PREFER? The board to replace the closed area of Unit 19A with a
registered Tier I permit hunt. Permits would be available at the store in Sleetmute. Permit application
would be for one week, one month before opening season. Anyone acquiring this permit can have no
other hunting permits in the Kuskokwim drainage.
STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED ABOVE.
a) for a conservation purpose or reason: This hunting season should have been available in the
2017 cycle of the Board of Game for Interior/Northeast Arctic Region (Region 3), however weather
conditions did not allow for aerial surveys to validate this opening until the board cycle was past. The
AC board was not able to put an agenda change request together because of all the summer activities
of its members.
b) to correct an error in regulation: It is not.
c) to correct an effect on a hunt that was unforeseen when a regulation was adopted: It is not.
WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE? This would not allow for local people to have an opportunity to take moose in close
proximity of their communities.
STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. This will be a Tier I
registration permit hunt available to all Alaskans.
IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT
COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF
THE REGULAR CYCLE. It is not.
STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR. I
am a subsistence hunter and have lived in this area for 31 years.
STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A
PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME
MEETING. Not to my knowledge.
Note: Proposal 165 was accepted by the Board of Game as an Agenda Change Request for consideration at the Central/Southwest Region Meeting in February 2018.

PROPOSAL 165 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a registration hunt for moose in Unit 19A as follows:

Replace the closed area of Unit 19A with a registration Tier I permit hunt. Permits would be available at the store in Sleetmute. Permit application would be for one week, one month before opening season. Anyone acquiring this permit can have no other hunting permits in the Kuskokwim drainage.

What is the issue you would like the board to address and why? The closure of Unit 19A above the George River to moose hunting. The fish and game survey of spring 2017 showed there is a harvestable population for the first time since the closure in 2006.

This hunting season should have been available in the 2017 cycle of the Board of Game for Interior-Northeast Arctic Region, however weather conditions did not allow for aerial surveys to validate this opening until the board cycle was past. The advisory committee was not able to put an agenda change request together because of all the summer activities of its members.

If the problem is not solved prior to the regular cycle, the local people will not have an opportunity to take moose in close proximity of their communities.

This will be a Tier I registration permit hunt available to all Alaskans.

PROPOSED BY: Henry Hill (HQ-F17-ACR1)
There have been and continue to be, widely different views on fish and game issues within the communities of 19A, and on the committee itself.

In 2002, when the Central Kuskokwim Moose Management Plan (CKMMP), started, people from every user group volunteered to be on the committee. I could not have represented the interests of guides, since guides wanted to continue to hunt moose when I believed there should have been a closure. I viewed any time spent on the CKMMP Committee as a waste, since most of the members seemed intent on the continued hunting of at-risk moose stocks. I chose not to participate. I and a few others on the CKAC had advocated for a closure or moratorium along with a predator management program before this Moose Summit, and continued to do so after the Plan’s consensus meeting in Feb. 2004, and the CKAC meeting which followed.

Total of 14 members of the CKMMP Committee
3 members from other ACs, (Anchorage, Lower Kuskokwim, and Palmer/ Matanuska)
6 CKAC members (including 2 from Aniak)
1 rep for big game guides
1 rep for big game transporters (Aniak)
1 rep for conservationists
1 rep for local subsistence (Aniak)
1 rep for lower Kuskokwim subsistence, (GMU 18)

Big game transporters rep. - The mayor of Aniak is a transporter and fuel vendor. Sent comments in for the March, 2006 BOG meeting, to keep moose open in 19A

Local subsistence hunters rep. - The board chairman, (Aniak res.), of The Kuskokwim Corporation, (TKC) has repeatedly stated that there is no predator problem in 19A, and has worked to insure that the DF&G predator management program for 19A is forbidden on corporation land. All these villages in 19A with the exception of Lime Village are shareholders, and most of them disagree with this policy.

CKAC rep. - At the same meeting the chairman of the CKAC, (also from Aniak,) advocated for a continuation of the registration moose hunt in lower 19A, in spite of March and November 2005 moose surveys that showed a drastic drop in moose numbers.

At the CKAC which immediately followed the CKMMP meeting in Feb, 2004 - a Tier I registration hunt was proposed by a vote of 10 in favor, and myself abstaining. I again spoke for a closure, since there was not going to be any reduction in moose hunting where it was most needed - on the rivers. This hunt was in effect for 2 years throughout
19A, which resulted in the continuing decline of the moose. There were noticeably a few more young bulls on the Holitna that summer of 04 due to the effectiveness of the predator management program. I saw more bulls the summer of 2004 than I had seen in several years. But after the fall, 2004 moose season, all that was lost. 122 bulls were taken fall of 04 - and 171 fall of 05.

This restriction did not, and could not legally go far enough, and allowed for the consistently largest user group, (Unit 18 hunters) to continue hunting 19A. There are about 23,000 people in Unit 18, and less than 1500 in 19A. For many years Unit 18 hunters consistently took a large percentage of 19A moose - 40-50% was common. The Holitna drainage sustained this pressure, and could have continued – but not without predator management.

Total moose taken in 19A – (by harvest reports)

Unreported harvest was typically figured at 33% of total harvest

<table>
<thead>
<tr>
<th>Year</th>
<th># hunters</th>
<th># successful</th>
</tr>
</thead>
<tbody>
<tr>
<td>1984-5</td>
<td>339</td>
<td>181</td>
</tr>
<tr>
<td>1985-6</td>
<td>317</td>
<td>129</td>
</tr>
<tr>
<td>1986-7</td>
<td>230</td>
<td>114</td>
</tr>
<tr>
<td>1987-8</td>
<td>332</td>
<td>167</td>
</tr>
<tr>
<td>1988-9</td>
<td>311</td>
<td>155</td>
</tr>
<tr>
<td>1989-90</td>
<td>284</td>
<td>113</td>
</tr>
<tr>
<td>1990-1</td>
<td>256</td>
<td>139</td>
</tr>
<tr>
<td>1991-2</td>
<td>255</td>
<td>137</td>
</tr>
<tr>
<td>1992-3</td>
<td>269</td>
<td>184</td>
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<tr>
<td>1993-4</td>
<td>215</td>
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<td>1994-5</td>
<td>364</td>
<td>168</td>
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<tr>
<td>1995-6</td>
<td>304</td>
<td>141</td>
</tr>
<tr>
<td>1996-7</td>
<td>339</td>
<td>184</td>
</tr>
<tr>
<td>1997-8</td>
<td>280</td>
<td>142</td>
</tr>
<tr>
<td>1998-9</td>
<td>292</td>
<td>146</td>
</tr>
<tr>
<td>1999-00</td>
<td>277</td>
<td>118</td>
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<tr>
<td>2000-1</td>
<td>292</td>
<td>108</td>
</tr>
<tr>
<td>2001-2</td>
<td>293</td>
<td>95</td>
</tr>
<tr>
<td>2002-3</td>
<td>253</td>
<td>67</td>
</tr>
<tr>
<td>2003-4</td>
<td>258</td>
<td>67</td>
</tr>
<tr>
<td>2004-5</td>
<td>754</td>
<td>122 registration hunt</td>
</tr>
<tr>
<td>2005-6</td>
<td>782</td>
<td>177 registration hunt</td>
</tr>
</tbody>
</table>

The GMU 19 ANS was 430-470 /Harvest, Surplus was 94-130

About 1000 permits were issued each year, which gave a more accurate number of hunters taking part, but not necessarily accurate reporting. When comparing the
number of hunters and the number of successful hunters from the previous years to the 2004 & 2005 seasons, it shows much more hunter participation, (tripled), as well as a higher number of moose killed. Both years hunt take surpassed the harvestable surplus of 94-130 - it doubled in 2004 and tripled in 2005, (with the 2005 take of 177 animals being the highest since 1996) - further sapping the already depressed moose population.

This was a consensus of different user groups agreeing to have unrestricted moose hunt in 19A, when they all knew the herds were at risk. At the 2004 CKAC meeting, immediately after the last CKMMP meeting - I voted against this hunt – and urged an area-wide closure.

<table>
<thead>
<tr>
<th>Downriver/western 19A Tier II Hunt</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td># Permits</td>
<td># reporting</td>
<td># success</td>
<td></td>
</tr>
<tr>
<td>2006-7</td>
<td>200</td>
<td>178</td>
<td>24</td>
</tr>
<tr>
<td>2007-8</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

After 2 seasons with the registration hunt, it was evident that a mistake had been made. Moose populations continued to decline. The one benefit of the registration hunt was more accurate harvest reporting.

At the Nov, 2005 CKAC meeting, the chairman wanted to continue a registration hunt in 19A, in spite of the fact that the March, 2005 moose surveys had shown that moose numbers were continuing to decline. The committee voted against a closure proposal written by Sleemute reps for all of 19A, but then voted to support an alternate proposal to close the upper portion of 19A and continue with the registration hunt in lower 19A, which passed 8-2. The dissenting votes were the Aniak reps. So this proposal was sent to boards support. At this same time DF&G was doing a moose survey in 19A, so the latest data was unavailable. Several days later, with the new survey info available, the Dept. of Fish & Game made a proposal to close upper 19A and have a Tier II hunt in the lower portion.

In Feb, 2006, the CKAC chairman called for a teleconference, where the committee withdrew its support of the proposal it had agreed to in November and a proposal was passed to have a Tier II hunt in the upper portion and a registration hunt in the lower part.

After that, CKAC members, representing Sleemute and Stony River, supported by their village councils and the Lime Village council attended the March, 2006 BOG meeting, advocating for a closure in at least part of 19A rather than a Tier II hunt – with it's continuing hunting pressure. Randy Rogers of DF&G / Wildlife Division, (who had been at both the CKAC Nov, 2005 meeting and was online for the Feb, 2006 CKAC
teleconference), helped explain and make clear to the board why these villages wanted a closure rather than Tier II. Randy had been the main organizer and mediator of the CKMMP.

The BOG adopted the DF&G proposal that called for the closure upriver and Tier II downriver. This regulation has been in effect for the fall 2006 and 2007 seasons. In the fall 2006 lower 19A Tier II hunt, there were 200 permits issued, and 24 moose were taken out of 178 hunters who reported.

The Nov, 2006 CKAC meeting was held in Aniak, and boycotted by the Aniak representative - the CKAC chairman. The committee had to appoint a resident of Aniak to get a quorum. The committee elected new officers and unanimously approved proposals 16 & 17.

The predator management program did not account for many wolves this year, due to bad flying and spotting conditions. Over last winter, fewer wolves were seen in the 19A Holitna drainage than the past few years – also, still very few moose.

In May, 2006 a moose composition count was done in the Holitna portion of the closure area of 19A. There were indications of a good calf and yearling survival rate. Residents have seen the #s of calves on the Holitna diminish some over the summer. With the large number of black and brown bear seen all over 19A, and quite a few killed - bear predation is given credit.
Using Harvestable Surplus To Build Herds

If harvestable surplus is less than ANS then Tier II is the only hunt allowed. To get out of Tier II harvestable surplus must be higher than ANS.

**A harvestable surplus does not have to be hunted.**
The goal of sustainable yield trumps subsistence
If there is no harvestable surplus or it is lower than ANS – Tier II can be bypassed and a closure can be made. Management goals can be refined or changed.
The harvestable surplus can be kept in the herd to help build it, if management goal is to build the herd – (when #s are too low.)
The agreement of subsistence users is needed for this to be done.
Subsistence users have to temporarily wave their rights to hunt a stock, in order to keep a harvestable surplus in the herd to build it, till the agreed on management goals for that stock are met.

**19A Moose Closure**

Low Density Dynamic Equilibrium (LDDE) exists in 19A.

**BOG Intensive Management Program**

<table>
<thead>
<tr>
<th></th>
<th>19A</th>
<th>19A &amp;B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pop. objective for moose is</td>
<td>7600-9300</td>
<td>13500-16500</td>
</tr>
<tr>
<td>Harvest objective is</td>
<td>423-536</td>
<td>750-950</td>
</tr>
</tbody>
</table>

**CKMMP objectives**

25-30 bulls/100 cows & 30-40 calves/100 cows

**GMU 19A 2004 & 2005 Registration Moose Hunts**

19A harvestable surplus was set at 94-130
In 2004 reg hunt – 122 moose killed
In 2005 reg hunt -171

After Nov 05 moose survey DF&G set harvestable surplus at
Lower 19A - 60-100 animals
Upper 19A - 0

March, 06 BOG meeting – ANS for subunits of GMU 19 were set –
Unit 19 ANS is 430-740
19A 175-225
19B 20-24
LVMA 30-40
19D(east) 130-150 (estimated during McGrath wolf pred. control program discussions)
Leaving 19C & D (remainder) - 75-301

BOG focus was on the number of residents in 19A when settling on ANS of 175-225 Above 225 is Tier I.
SHAC's Hunt Recommendations for an
Experimental Tier I / Subsistence Registration Hunt in 19A/East

Considerations -
- Moose herd #s are very low in the Closea Area / 0.6 moose/sq. mile
- There is a lack of law enforcement in the area
- Most likely will not get a checkpoint installed.
- Boat hunters claiming they killed moose in 19B, but actually killed in 19A will continue & increase.

Conditions -
- On the Kuskokwim River, (GMUs 18 & 19), **only one permit hunt can be applied for in a season.** This presents enforcement difficulties, (There is no Wildlife Protection Trooper in Aniak). It may be difficult to verify that persons getting permits for this hunt don’t already have permits elsewhere. **Make it a large and presumptive penalty for having more than one permit, or other violations of the hunt restrictions.**
- Hunters accessing the Holitna Watershed by boat, (at least within the Holitna Hoholitna CUA), can hunt moose in 19A and 19B only if they possess this 19A registration permit. *(2008 Region 3 BOG Meeting / SHAC Prop13)*
- 5-day hunt opening / Sept. 1-5. Have the hunt coincide with other permit hunts in GMUs 18 & 19 / Have 19A east hunt opening occur at same time as 19A Tier II, GMU 18 reg hunt, 19D registration hunts.
- Permits will be issued in July, and issue dates will be determined by the area biologist.
- The area biologist should be authorized to issue up to 75 permits, and adjust the number issued up or down, according to moose survey results.
- The 1st hunting season should not occur before Fall, 2019. After the McGrath Bear Removal Program, there was a 5-year moratorium on moose hunting in that area, so that there would be another generation of cows mature enough to bare calves. SHAC would like to see the same delay for a hunt happen in 19A.
- In the 1st hunt season, 30 permits will be issued for 1 antlered bull.
- 10 permits will be issued in Stony River, and 20 in Sleetmute
- Permits will be issued in July at the Traditional council offices on 2 successive days - 1 day in Sleetmute, and 1 day in Stony River. (Dates in July are to be decided by the area biologist)Wording should be, “permits available within the hunt area- in person only”
- Only one permit will be issued to a household.
- Proxy hunters for elders will be allowed for this hunt.
- Hunt reporting must be done within 15 days of hunt closure. Failure to turn in a report will result in no permit eligibility for the next season.
- It is understood that if or when moose #s in 19A East become low – the area will return to a closure, rather than going into Tier II.
- The trigger for return to a closure, is if/when the bull:cow ratio goes down to 35 bulls : 100 cows, the area returns to a closure.
- Composition counts should be done each year to see how population is doing –(Bull:cow/ calf:cow)
- Law enforcement is low in the area – have it increased during the reg. hunt and during the 19B season.

Other conditions considered - but not agreed on or recommended -
- No commercial services allowed – no guiding, outfitting, transporting services to be used
- Access for hunt only by scheduled commercial aircraft to publicly maintained strips in one of the villages, (SLQ, Stony, RD)
- A checkpoint @ mouth of Holitna.
- Make this a winter subsistence hunt – open in Nov. or Feb.
- Cap on the number of moose taken (20), with 1 or 2 days to report success.
Split GMU 19A into 
19A East & 19A West

<table>
<thead>
<tr>
<th></th>
<th>19A East</th>
<th>19A West</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Topography</strong></td>
<td>Tundra /Lowland</td>
<td>Hills &amp; mountains</td>
</tr>
<tr>
<td><strong>Land ownership</strong></td>
<td>Mostly State &amp; Native</td>
<td>Mostly Federal and Native</td>
</tr>
<tr>
<td><strong>Population</strong></td>
<td>192 (RD/SLQ/Stony/Lime)</td>
<td>1216 (Aniak/Kals/Chuath/CkdCrk)</td>
</tr>
<tr>
<td>(2010 census)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Harvestable Surplus (set by ADF&amp;G-Nov.2005)</strong></td>
<td>0</td>
<td>60-100-(set @60 in 2010)</td>
</tr>
<tr>
<td><strong>Moose Hunt seasons for 2 separate, identified stocks</strong></td>
<td>Closure</td>
<td>Tier II</td>
</tr>
</tbody>
</table>

**Wolf Predator Control**

19A is an Intensive Management Area, and was approved area-wide for wolf predator control in 2004. The implementation of Tier II in lower 19A, and a Closure in upper 19A were partly due to the ban on pred. management on federal and The Kuskokwim Corporation, (TKC), land. After a few years ADF&G Wildlife Conservation limited the pred. control area to what is on the (attached) map. (ADF&G did write a caveat into the plan, saying the pred. control area could be expanded up to 40% within 19A, in case there were policy changes by the feds or TKC.)

**The ANS of 400-700 moose for GMU 19 was broken down by subunit at the March, 2006 Region III BOG Meeting. BOG determined an ANS for each subunit. The 19A ANS for moose is 175-225, and 30-40 within the Lime Village Management Area.**

In 19A, with one ANS for 2 separate moose stocks, if the ANS is reached for 19A mainly through the increase of one of the 2 stocks, it could force a Tier I season on all of 19A, including the other moose stock – which may have had no increase & shouldn’t be hunted.

**When speaking of consumable harvestable animal resources – in 19A we are speaking primarily of salmon & moose**

Habitat: The Holitna River is the largest tributary of the Kuskokwim Holitna Basin – In the Kuskokwim Area Plan – it's primary use is designated as habitat for prey & predator mammal species, furbearers, migrant waterfowl, and several species of fish.