

RC14

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Dear Board of Game,

Please accept my late comment regarding proposal 23.

Proposal 23: Strongly Support

I support this proposal to open additional mountains in the Juneau area to the archery-only hunt (RG014). My support for this proposal can be divided into four factors: the successful management of the current hunt area, the unreliability of recent aerial surveys, the maximum public benefit of consumptive uses over non-consumptive uses, and the improbability of user conflicts.

The ADF&G ("department") has had success in managing populations of Mountain Goat on Baranof Island by establishing management objectives for small geographic areas. This management tactic could easily be established for the proposed hunt area. This fact has been proven by the management of the Blackerby Ridge area of the hunt. This particular area has been established as a 1-2 point management area (billy = one point, nanny = two points), and harvest has reached that level without exploitation or degradation of the resource. By employing this management strategy for the proposed hunt area, the department would retain the ability to close by emergency order those areas that are of concern, biologically or otherwise. The approval of this proposal would, at least, get this updated area into the regulations. It would not necessarily mean that these areas would be open to hunting each year. This is evident by the fact that the area of Eagle River to Sawmill Creek in RG012 has been closed each year to hunting due to biological concerns. The rejection of this proposal would unnecessarily refuse the public the opportunity to responsibly utilize this resource, should populations support it.

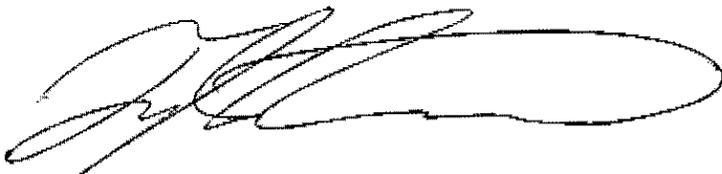
The department has based their opposition of this proposal on recent aerial surveys. This is the first survey that has been conducted since 2014. The survey of the current hunt area, as reported by the department, reported two goat sightings on Blackerby Ridge. I have personally hunted this ridge under RG014 and have sighted eight goats in one day from atop Blackerby Ridge. That same aerial survey reports 39 goats in the proposed additional area. While hunting atop Mt. Troy on Douglas, which has a direct view of the south face of Mt. Juneau, I was able to spot 36 mountain goats on the south face of Mt. Juneau. The department has reported that the aerial survey was conducted under poor conditions during a very dry and warm period. Given the discrepancies between the aerial survey, the lack of aerial surveys between 2014-2018, my personal sightings, and the reported unreliability of the survey by the department, I do not believe a rejection of this proposal based on the aerial surveys would be prudent. The department has stated that additional data should be collected to establish an accurate level of sustainable harvest. Approving this proposal would get the hunt area on the books and still allow the department to close certain areas until additional data has been collected.

Many commenters have stated that non-consumptive uses of these populations, such as wildlife viewing, are of higher importance than consumptive uses. It is worthwhile to note that Article VIII, Section 1 of the Alaska Constitution states: "It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." The Constitution also states that these resources should be made available for the maximum public benefit. The issue here is whether consumptive or non-consumptive uses represent the maximum public benefit. Hunting represents a direct, tangible, and calculatable public benefit to the State by the sale of hunting licenses and sporting goods. Non-consumptive uses represent indirect and intangible benefit to the State. To establish that non-consumptive uses represent the maximum benefit, research would need to be conducted. In the absence of such research, I encourage you to side with consumptive uses.

It is a known fact that the majority of dissent from the public regarding this proposal is generated from the potential of reduction in goat viewing opportunities and increase in user conflicts. Of prime importance is the potential for conflicts on Mt. Roberts, Mt. Juneau, Mt. Bullard, and the area around the Mendenhall Glacier. Regarding user conflicts, particularly with hikers, I have yet to hear of substantial user conflicts with hunters on Blackerby Ridge where goat hunting is already taking place. Regarding Mt. Roberts, it would be prudent, and within the authority of the department, to close the area within a quarter-mile of the Mt. Roberts trail up to Gastineau Peak. This closure would eliminate this particular user conflict. Regarding Mt. Juneau, many members of the public are worried about goat viewing opportunities. Closing the west side of Mt. Juneau, where the vast majority of goat viewing takes place, would eliminate this conflict. Regarding Mt. Bullard, the south face of the mountain, where the vast majority of goat viewing takes place, is virtually un-hunt-able due to topography. Therefore, this concern is unfounded. Finally, the immediate area around the Mendenhall Glacier is closed to all hunting. Therefore, this concern is also unfounded. Given these facts, it is my belief that this proposal can be approved with the elimination of user conflicts.

Thank you for the opportunity to participate in this public process. I am confident that you will make the best decision for the maximum public benefit regarding this proposal. In light of the facts presented above, I believe that approval of this proposal represents that maximum public benefit.

Signed,



Tyler S. Riberio
January 11, 2019