

On-Time Public Comment Index

Resident Hunters of Alaska (RHAK) PC01



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

January 11, 2021

Board of Game Work Session Comments

January 21, 2021

Postponement of 2021 Meetings

Due to the ongoing pandemic and valid concerns of holding the Region IV and Statewide meetings in person this spring, RHAK supports postponing the meetings until 2022, and moving the entire cycle ahead a year. We believe the public will be unfairly disenfranchised if the board holds these meetings over web-conference.

If the board postpones the 2021 Region IV and Statewide meetings until 2022, we respectfully request that new proposals be allowed to come in for those meetings, along with new comments on those proposals. Essentially, an entirely new call for Region IV and Statewide proposals and subsequent comments, in addition to the existing proposals and comments.

Rationale: population and harvest data and individual hunting experiences change from year to year, and it is that data and experiences the public and the Department utilize when considering drafting a proposal. The board also considers this same information for board-generated proposals. It has already been nearly a year since the proposals for the 2021 meetings were sent in, and we already have new Department harvest and population data that the public and the Department should be allowed to review and then comment on with a proposal.

We are in unprecedented times and the board has already had to make some tough decisions due to the pandemic. And we believe those were the right call.

Any new proposals should not duplicate or serve the same intent as proposals already submitted, though updated data should be allowed to be added to an existing proposal.

We do indeed have the best public system of wildlife management in the country and we want to keep it that way. Please allow the public and the Department to send in new proposals for the Region IV and Statewide meetings by the May 1, 2021 deadline if the 2021 Region IV and Statewide meetings are postponed until 2022.



Antlerless Reauthorizations and Tag Fee Exemptions

There are some regulatory matters the board must attend to this year, such as antlerless moose reauthorizations and brown bear tag fee exemptions. Those can be done over a publicly noticed web-conference.

Board Policy on Amendment Process

Please refer to our April 22, 2020 letter, which is attached with this on page 3. We appreciate the board taking this matter up. We want to reiterate that we are not advocating for disallowing the board from making amendments to proposals. We understand amendments are often necessary for legal reasons and to ensure the intent is clear. It is the cases as in the example in our letter that are, frankly egregious, and not at all in line with how the board is supposed to function.

So we ask the board to develop some kind of rule, finding, or policy to address this matter, that would not preclude the board from making amendments to proposals that do not change the intent of the proposal, as in cases like the example given. In those instances, when the board has other ideas opposite the intent of a proposal, the board should vote the proposal down or take no action. The board always has the option to form a board-generated proposal.

Sincerely,

Mark Richards
Executive Director Resident Hunters of Alaska



April 22, 2020

To: Alaska Board of Game

From: Resident Hunters of Alaska (RHAK)

Re: For consideration during the January 21, 2021 Work Session meeting to be held in Wasilla

Dear Board Members,

RHAK had initially drafted this as a proposal for the 2021 Statewide meeting, and in discussion with Executive Director Tibbles, she felt this may be the best avenue to approach a proposal to adopt a Finding or Policy. However, we certainly don't want this to get denied for the Work Session and/or lost in the myriad of other issues that will come before the board during the Work Session.

Here's what we want to address, and this is from our original proposal draft for the Statewide 2021 meeting:

Amendments to Proposals submitted by the public that run completely contrary to the original proposal

At the last Region III BOG Meeting in 2020, Resident Hunters of Alaska (RHAK) submitted a proposal (#146) to limit the number of nonresident hunters being awarded the DC 827 caribou draw permit, asking that no more than 10 percent of the permits be awarded to nonresidents, and a minimum of 90 percent of the permits to residents. At that time the DC 827 caribou draw permit was open to all equally, and due to an influx of hunt booking agents flooding the draw permit application pool nonresidents were typically receiving 25 percent of the permits, which we strongly disagreed with.

When the Board deliberated our proposal, they successfully amended and passed it guaranteeing nonresident caribou hunters at least 25 percent of the DC 827 permits.

This decision was the complete opposite of the intent of our proposal! The Board could have just voted down our proposal, allowing hunt bookers to continue to flood the application pool for the DC 827 caribou permit leading to the same high nonresident percentage of awarded permits. Instead, they forever guaranteed nonresidents a minimum of 25 percent of those permits.

The Alaska Board of Fisheries has Standing Rules that address this issue in their Finding #91-128-FB¹, and in that Finding it states: *"Do not change or reverse the intent of a proposal/issue. For example, if a proposal's intent is to restrict a particular fishery and the board wishes to close or expand the fishery, the board will not amend the original proposal. The board will defeat, table or take no action on that proposal and then develop a board generated proposal to accomplish the*

¹ <http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff91128x.pdf>



action they feel is needed."

We would like to see the Board of Game adopt a similar Finding or Policy or Standing Rules governing amendments that change or reverse the intent of public proposals, as happened with RHAK proposal #146 at the Region III 2020 meeting.

We understand that amendments to public proposals are often necessary for clarification, and that minor changes are often warranted. We are not asking that the Board not be allowed to make amendments to proposals. But these kinds of amendments that take the complete opposite position of the proposer should not be allowed.

Thank you for your consideration,

Mark Richards
Executive Director Resident Hunters of Alaska
(907) 371-7436