



From: Native Movement

To: The State of Alaska Board of Game

Subject: Comments on Proposals for the Region III Meeting, on March 15-22, 2024

Tok Area- Units 12 And 20E (Proposals 111, 117-119, 122-123)..... 10

Delta Junction Area- Unit 20D (Proposals 125, 131-135)..... 10

Galena Area- Units 21B, C, D, and 24 (Proposals 139-153)..... 11

Northeast Alaska Area- Units 25A, B, D, 26B, D, 26B and C (Proposals 154-156)..... 15

Additional Proposals (Proposal 207)..... 17



NATIVE MOVEMENT

TOK AREA- UNITS 12 AND 20E (Proposals 111, 117-119, 122-123)

Proposal 111:

5 AAC 85.045. Hunting seasons and bag limits for moose

Recommendation- Oppose, there is already an opportunity under the draw and general season hunts when bow hunters could hunt. Bow hunters continue to seek more hunting opportunities than those using conventional methods and we do not support weapons-restricted hunters having more opportunities than others.

Proposal 117:

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts

Recommendation- Oppose, no applicability with current permit allocation of 1 permit.

Proposal 118:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts

Recommendation- Oppose, there is already an opportunity under the draw and general season hunts.

Proposal 119:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- Oppose, this would be an unworkable regulation, as there are legal full-curl rams that are 6 and 7 years old.

Proposal 122:

5 AAC 85.056. Hunting seasons and bag limits for wolf

Recommendation- Oppose, this is during denning and there are concerns about the lack of quality in hides at that time.

Proposal 123:

5 AAC 85.056. Hunting seasons and bag limits for wolf

Recommendation- Oppose, see our comment on proposal 122.

DELTA JUNCTION AREA- UNIT 20D (Proposals 125, 131-135)

Proposal 125:

5 AAC 85.045. Hunting seasons and bag limits for moose

Recommendation- Oppose, the department's ability to collect accurate data should not fall onto and possibly penalize hunters who have limited to no access to broadband and telecommunication services but still need to feed their families.

Proposal 131:

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts



Recommendation- Oppose, the current non-resident permit allocation should remain the same.

Proposal 132:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts

Recommendation- Oppose, there is already an opportunity under the draw and general season hunts.

Proposal 133:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts

Recommendation- Oppose, see our comment on proposal 132.

Proposal 134:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- Oppose, there are only two DS 206 permits available, and question why non-residents are still allowed to apply.

Proposal 135:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- Support, there are only two DS 206 permits available for this isolated and very low sheep population and it is not understandable why there is currently any nonresident opportunity.

GALENA AREA- UNITS 21B, C, D, AND 24 (Proposals 139-153)

Proposal 139:

5 AAC 85.025. Hunting seasons and bag limits for caribou

Recommendation- Support, there is a strong need to conserve WACH adult cow caribou and believe that conservation of this herd should be shared across their range by all users.

Proposal 140:

5 AAC 85.025. Hunting seasons and bag limits for caribou

Recommendation- Support, close nonresident hunting opportunities especially where there are conservation concerns and the risk of further decline in the population. Although the number of non-resident hunters is smaller compared to the number of resident hunters, the non-resident hunters pursue the largest bulls of the herd. The larger bulls lead the migration and are the most reproductive.

It is essential to maintain a minimum ratio of 35 bulls per 100 cows to ensure a sustainable breeding structure and subsistence use. We recommend having a minimum composition of 6 to 7 large bulls, aged five years or older, per 100 cows. However, since there is



NATIVE MOVEMENT

no data available on the composition of the Western Arctic Caribou herd, it is unclear whether there are enough large bulls to maintain a sustainable breeding structure and subsistence use.

Large five-year-old bull caribou are crucial for breeding as they have enough fat reserves to cover cows during the very short estrous cycle of caribou. This has been well-documented in Denali National Park for many years. In Scandinavia and the Seward Peninsula, reindeer herders are selected for maintaining large five-year-old bulls in their herd population. It's worth noting that bull caribou are not skeletally mature until they are 4.5 years old, as presented at the Caribou/Ungulates Symposium in Anchorage in May 2023.

It has been observed that cows reject younger bulls while waiting for larger bulls to arrive for breeding. In the absence of large bulls, adult cows may miss their breeding window, and if they mate with younger bulls, they may produce poor offspring because of the prolonged calving dates. Moreover, younger bulls have shallow fat reserves and expend too much energy, leading to higher winter mortality rates. To avoid such issues, Proposal 140 should be adopted until large bull presence is documented by composition data. In 2007, the Melchatna caribou herd went into reproductive failure when the bull-to-cow ratio fell to 14 bulls per hundred cows, with only one large, five-year-old bull and older per 100 cows. Harvesting beyond the sustainability of large bulls would put the population at risk of further decline.

Proposal 141:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- Support, there are no additional Rams to provide for additional harvest opportunities outside of the normal season in the youth hunt. The number of legal rams found in the latest three-year survey is very small. We must preserve the remaining population. We emphasize the importance of conservation regarding the decreasing Dall sheep populations across the entire state, stressing the need for regulation and monitoring to prevent further declines.

The population of Dall sheep in corridor and units 24A and 25A west is decreasing at an alarming rate. The number of ewelike sheep is also declining, indicating that there isn't enough recruitment to stabilize the population. The current number of sheep is far below what the environment can support for the past two decades.

Proposal 142:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- Oppose, it does not go far enough to reduce the massive volumes of increasing hunter participation. Furthermore, creating an archery-only hunt can have potential negative impacts through wound loss (bow hunters have the highest wound loss) of an animal already extremely difficult to pursue, and could potentially fall or jump off a cliff edge.

There has been a lack of legal rams in the Dalton Highway Corridor since 2018, with a lack of enforcement in the high number of hunters that access the area on the road. With the decline of the Nelchina Caribou Herd, there was a significant increase in resident hunters that bring sheep



NATIVE MOVEMENT

harvest tickets. They come to hunt caribou, sheep, and bears. The harvest reporting does not reflect the high number of hunters that attempt to take sheep legally with archery, or illegally with firearms within 2 miles and beyond from the road. Please address the sheep decline with a management strategy that entails limited drawing permits.

Proposal 143:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- Oppose, the current extended harvest opportunity without limiting participation for an extended 15 days to October 5 cannot be supported for sustained yield. See comments on proposal 142.

Proposal 144:

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Recommendation- The proposal as written is flawed and all permits could hunt either game management unit 26B west of the Sagavanirktok or 24A. We highlight the need for conservation and reduced participation in hunting opportunities. 10 draw permits are far too many to allocate when you consider the very limited adult Ram population in the above units. We suggest allocating a specified number of permits to each subunit. Guided hunters have a very high success rate there are only a few adult Rams available and each of those subunits and overall sheep populations are falling. We do not support the proposal as is but will support a modified version with amendments to allocate only 2 draw permits for nonresidents in Unit 26B and only 2 draw permits in Unit 24A, which would define where those permits can be used. We emphasize the need for the state to consider the impact of commercial hunting on the population.

Proposal 145:

5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose

Recommendation- Support, the moose population can support some antler-less cow harvest especially if local residents are going through a hard time and were not successful or able to fill their freezers with other fish and game. We hope informed decisions will be carefully made in consultation with the local community and tribal organizations to ensure there is consensus regarding the take of cow moose and that no future conservation concerns result from such take.

Proposal 146:

5 AAC 92.124. Intensive Management Plans VIII

Recommendation- Oppose, the resident wolf numbers have relatively high harvest rates by local trappers, trappers from the road, people shooting free-ranging for bears and wolves, or the trapping license and game management units 24A and 26B especially. So there is enough harvest of wolves in this area. Resident wolf populations have reduced significantly through consistent harvest and cannibalization after the snowshoe hare decline in 2020.

Furthermore, this is a small area which makes it difficult to successfully implement IM. Wolves are density-dependent reproducers, and when a lot of wolves have been killed off, the



NATIVE MOVEMENT

pack will produce even more pups the following season. When we remove entire packs, more come into fill their territory, thus having to kill a lot of wolves, and continuously, for it to have a positive impact on ungulate populations. Lastly, when we decimate these packs, the elders are often killed off, leaving the younger wolves to learn on their own. The elders teach the younger generations how to hunt, how to survive, and how to be a wolf. So when the younger wolves are not taught how to hunt, survive, and be a wolf, they start to wander into communities looking for easier prey. When the state implements an IM program, it has often left the villages to take care of a problem that they didn't create which takes a lot of time and resources. We emphasize the need for clear expected outcomes before implementing such measures.

Proposal 147:

5 AAC 92.124. Intensive Management Plans VIII

Recommendation- Oppose, see comment on proposal 146. We also question the statutory requirements for adopting same-day airborne and the lack of prior control plans for units 24 and 25.

Proposal 148:

5 AAC 92.124. Intensive Management Plans VIII

Recommendation- Oppose, see comment on proposal 146. There is already a sustained and consistent harvest of wolves by trapping and harvesting of free-ranging fur-bearers as well as archery hunters.

Proposal 149:

5 AAC 84.270. Furbearer trapping

Recommendation- Oppose, this would entail excessive incidental bear harvest at this time of the year. Bears would have to be euthanized and surrendered. Current seasons are best for the harvest of wolves.

Proposal 150:

5 AAC 85.056. Hunting seasons and bag limits for wolf

Recommendation- Oppose, Indigenous people believe in using every part of an animal out of respect and traditional values. Wolves are shedding their fur extensively in June and are of no value which would be a waste of an animal.

Proposal 151:

5 AAC 85.056. Hunting seasons and bag limits for wolf

Recommendation- Oppose, see comment on proposal 150.

Proposal 152:

5 AAC 85.020. Seasons and bag limits for brown bear.

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.



Recommendation- Support, however, we must note that when you harvest a large boar that dominates a particular area, it allows younger bears to come into that area, allowing a higher number of bears to populate with unintended consequences. We acknowledge that bears are an important food resource, combined with the Yukon River salmon decline, which is also an important food source for both humans and bears, we do support some additional harvest opportunities. In the past, large dominant boars have been harvested and now some communities are dealing with more bears coming into an area and there is a risk of bears traveling closer to communities to scavenge.

Proposal 153:

5 AAC 85.057. Hunting seasons and bag limits for wolverine.

5 AAC 84.270. Furbearer trapping

Recommendation- Support, females that den under the snowpack are not likely to be harvested. Adult males would likely be harvested by the few trappers continuing to harvest wolves and beaver through April 30.

NORTHEAST ALASKA AREA- UNITS 25A, B, D, 26B, D, 26B AND C (Proposals 154-156)

Proposal 154:

5 AAC 85.025 Hunting seasons and bag limit for caribou

Recommendation- The Caribou population experienced a significant decline from 2010 to 2015 due to rain on snow events and late spring in 2013. In 2010, the harvest of cows with a five Caribou bag limit contributed to taking lead cows during the fall migration, which resulted in the deflection of the Caribou migrations in the fall. Several hunters used jet boats, air, boats, and other watercraft for access to the Sagavanirktok, Ivashack, and Ribdon rivers. By taking lead cows, many in the front of the migration, the hunters contributed to the deflection of the herd away from the road corridor to the southeast metal for Chandalar, and far out to the Arctic Ocean coast through the closed area and to the west of the road. The archived telemetry shows that the herd continues to avoid the road corridor, and they avoid the Sagavanirktok drainage because of that entrainment. We oppose cow harvest during migration in August and September.

The central arctic herd can support some cow harvest, but not more than one per hunter after October 1. The herd has increased from 22,500 to 34,500 without any cow harvest. However, it has now reached a point where it is stabilizing and not growing significantly. If large cow bag limits are allowed with high participation, it will result in a population far below the management objectives and sustainability required for future harvests. The population of the Central Arctic herd can be maintained at a similar level as the Teshukpuk herd. Suppressing caribou herds can prevent them from migrating into vast and unused wintering areas on the south slope of the Brooks Range. Currently, the Central Arctic herd is mainly present in game management units 24B, 24A, and 25A. Caribou have been largely absent from the central South Slope Brooks Range 24A and 24B for the past 50 years. The winter range can easily support the



central Arctic, Teshukpuk, and Porcupine Caribou herds. The current resident hunter bag limit of 4 bulls per hunter in 26B is quite large. Additionally, there is a growing number of displaced caribou hunters participating in hunting.

It is necessary to maintain a minimum ratio of 35 bulls for every 100 cows. We recommend having at least 6 to 7 large bulls, aged five years or older, for every 100 cows. However, it is unknown if there are enough large bulls to sustainably breed the central Arctic Caribou herd and support subsistence use since there is no current composition data available. Large five-year-old bulls are the key breeding component and have enough fat reserves to mate with cows during their short estrous cycle. Reindeer herders in Scandinavia and on the Seward peninsula maintain large five-year-old bulls for breeding their herds. According to research presented at the Caribou/Ungulates Symposium in Anchorage in May 2023, bull caribou do not reach skeletal maturity until they are 4.5 years old. Mature, large bulls produce strong calf cohorts.

When it comes to breeding, adult cows prefer large bulls over younger ones. If there are no large bulls available, adult cows may miss the breeding season, and if bred by younger bulls, the resulting offspring may have poor health due to longer calving dates. Bulls younger than five years old do not have enough fat reserves and may not survive harsh winters.

It is recommended that the non-resident bag limit should not be increased until the presence of large bulls is documented by composition data. It is important to maintain a ratio of six to seven five-year-old breeding bulls post-hunt to ensure sustained yield. Harvesting of four bulls by residents is a priority. The board needs up-to-date bull composition data to decide on expanding the nonresident bag limit. More than 50% of the harvest in game management unit 26B is by nonresident hunters.

We have immense concern about recent harvests across other Alaskan herds that go against biology and conservation. In 2007, the Melchatna caribou herd experienced reproductive failure due to a significant drop in the bull-to-cow ratio. The ratio fell to 14 bulls per 100 cows, with only one large bull that was five years old or older per 100 cows. This led to a sharp decline in the herd's population from 200,000 to 22,500. Unfortunately, the population continued to decline and is currently in a critical state, with only 11,500 caribou remaining. Nelchina Caribou herd experienced excessive harvesting of large bulls in 2020 followed by a 60% harvest of the largest cows in 2021, leading to a significant decline, especially due to the hard winter last year.

There is a lot of misunderstanding regarding the ecology of Caribou. It is important to understand what they eat annually and the parameters for harvesting herds. Caribou are migratory and tend to move to unused ranges when their population becomes large. Fortunately, Alaska has a lot of such ranges. During winter, they primarily feed on lichen reserves from late August to mid-April.

From mid-April to late August, Caribou restore their protein reserves and produce calves by consuming annual tussock sedge flowers in April and May. Later, they move on to wildflowers such as Lousewort and Dryas, which are highly productive and rich in protein.



Along with the above annual plants, they also consume high-protein pollen. Finally, when the flowers are pollinated, they rely on willow and other shrub leaves as the last source of protein.

The Caribou Range, which is used for grazing between April and August, is home to forage that is produced annually and cannot be depleted. The Central Arctic, Teshukpuk, and Porcupine Caribou populations are not close to depleting their winter habitats, which are available in the central south slope of Brooks Range, all the way down to the Yukon, Hodzana River, and Ray Mountains.

Due to the declines and conservation concerns of the 40-mile caribou herd and the Nelchina caribou herd, thousands of hunters will be displaced and may hunt caribou in unit 26B.

During the early 2000s, around 2000 hunters were documented in August and September at the Yukon River checkpoint, which was only open on weekends. However, in the fall of 2023, hundreds of hunters were traveling weekly on the Dalton Highway to unit 26B, and there were easily 3000 or more hunters participating during the long Caribou season. This large number of hunters can have a significant impact on the limited herd size present, as they have large bag limits. If the Central Arctic herd falls below 20,000, they will not migrate to the south slope in the game management units 24 and 25.

Thus, we recommend a modified proposal 154 to reflect a more sustainable management strategy. The state board of game should seriously consider conservation, and diverge away from excessive bag limits with high participation. The resident bag limit should be no more than five Caribou, 4 bulls from July 1, to April 30, and no more than one cow with a season for cow harvest from October 1, to April 30. The non-resident season August 1 to September 15 with a bag limit of 1 bull caribou should be maintained in regulation. We need data on bull composition for the central arctic caribou herd, especially the large bulls sought by non-resident hunters.

Proposal 155:

5 AAC 85.025 Hunting seasons and bag limit for caribou

Recommendation- We recommend modifying this proposal to allow resident bag limit of five Caribou, but no more than 1 may be a cow to be taken from October 1 to April 30.

Proposal 156:

5 AAC 85.025. Hunting seasons and bag limit for caribou

Recommendation- The increasing number of nonresident hunters in unit 26B needs to be regulated through a drawing permit or registration permit. There are a lot of non-residents that camp for many days in unit 26B remainder.

ADDITIONAL PROPOSALS (Proposal 207)

Proposal 207:

5 AAC 92.990(30). Definitions

Recommendation- Support, due to the need to conserve large fully mature, rams, and breeding structures to bring the sheep populations back to carrying capacity. High participation of hunters,



NATIVE MOVEMENT

unfamiliar with aging annual rings on sheep rams is causing a loss of recruiting adult rams. It is imperative to repeal the criteria to count rings in the field previous to harvest. This should've been a state-wide repeal. Some hunters can pass by getting a ram that technically meets the age requirements but wouldn't pass for full curl.