

The Minto-Nenana Advisory Committee comments on Proposal 210 are not reflected in RC5: ACPC Matrix. The MNAC *opposes* Proposal 210. Please see attached meeting minutes for reference which can also be found in AC 016. Thank you, Minto-Nenana AC.

2023-2024 Proposed Changes to Regulations
Interior and Eastern Arctic Region

Minto-Nenana Advisory Committee Comments

Minto

Carl Frank, *co-chair*
Charlie Titus
Andrew Jimmie
Louis Silas
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Nenana

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Larry Ketzler
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PROPOSAL 171

Change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F and 25C.

Comments:

Minto-Nenana advisory committee (MNAC) supports Proposal 171 to change all general season harvest tickets to registration permits for moose in Units 20A, 20B, 20C, 20F, and 25C. We were cautious to support changes to general harvest tickets due to the implications of not reporting. It is a deep concern of our locals that they will be put on the 'failure to report list', colloquially referred to as the no-hunt list in our communities. However, our area biologist Tony Hollis ensured our advisory committee that there will be a grace period of 1-year for people in these units who fail to report. He also said that the department staff would work to provide educational materials and speak with local communities and Tribes as a way of spreading the word about this regulation change.

With these reassurances, our advisory committee agreed that the harvest data collected through registration permits with help the department make management decisions. We stand in solidarity with the Tanana/Rampart/Manley AC in supporting this proposal, which would result in more complete harvest data to better inform the department's management decisions and improve moose population estimates.

PROPOSAL 172

Create a muzzleloader only moose hunt for residents and nonresidents in Unit 20A.

Comments:

MNAC opposes Proposal 172 to create a muzzleloader only hunt for residents and nonresidents in Unit 20A. The expansion of hunting opportunities should be available to all, especially when it comes to a population that many villages and communities depend on for meeting subsistence needs. Alaska Native peoples have been stewarding and harvesting from these lands for 10,000 years, yet the state continues to deny the ability for Alaska Natives to have a specific hunt or hunting rights. Until the state can provide hunting opportunities that honor the historical, ancestral relationship between Alaska Natives and the environment, no additional hunting opportunities such as these that gives unequal opportunity to a small group of people should be implemented.

PROPOSAL 173

Reauthorize the antlerless moose seasons in Unit 20A.

Comments:

MNAC opposes Proposal 173 to reauthorize the antlerless moose hunt in Unit 20A in solidarity with the Tanana/Rampart/Manly advisory committee. See rationale for opposition to antlerless hunts in comments for Proposal 178.

PROPOSAL 174

Change the boundary of the Wood River Controlled Use Area in Unit 20A.

PROPOSAL 175

Change the boundary of the Wood River Controlled Use Area in Unit 20A.

Comments:

MNAC opposes Proposals 174-175 to change the boundary of the Wood River Controlled Use Area. We align ourselves with TCC's comments on these proposals:

“The rationale behind both of these proposals is insufficient. Proposing regulatory changes because an influential hunter was cited for violating the controlled use area motorized vehicle prohibitions is insufficient to alter a longstanding regulation. Hunters must exercise due diligence to ensure they remain in compliance with regulations and mindfully navigate motorized vehicles to remain outside prohibited areas. It is the responsibility of motorized hunters to ensure safe and legal travel through the unit, without necessitating alterations to established boundaries.” *Tanana Chiefs Conference, submitted comments*

PROPOSAL 176

Reduce the nonresident moose bag limit in portions of Unit 20B, and eliminate nonresident moose hunting opportunities in portions of Unit 20B.

Comments:

MNAC supports Proposal 176, because Unit 20B provides subsistence needs for many people and communities. The current population estimate is below 8,000 moose with a management objective of 12,000-15,000. The state should prioritize subsistence needs being met and the availability of ceremonial and potlatch moose over nonresident opportunities.

PROPOSAL 177

Extend the current moose season in Unit 20B Remainder by five days for certified bowhunters only.

Comments:

MNAC opposes Proposal 177 to open hunting opportunities in Unit 20B. See comments on 172.

PROPOSAL 178

Reauthorize the antlerless moose hunt in Unit 20B.

Comments:

MNAC opposes Proposal 178 in line with the voices and concerns of our communities, particularly those of our Tribal Elders from Minto and Nenana. It is with a profound sense of duty to our heritage, cultural beliefs, and the well-being of our lands that we express our unanimous opposition to the implementation of antlerless moose hunts.

Our peoples' cultural beliefs have always been clear- unless a cow presents herself during a time of need for ceremony we do not take cows. Traditional beliefs are unwavering, grounded in the deep-seated traditions of our Athabascan culture. It is against our beliefs to take a cow moose unless it is explicitly necessary for significant religious and cultural practices, such as for a potlatch. The recent maneuvers to gain support for these hunts disregarded these cultural imperatives and aimed to prioritize the reauthorization of a management tool that doesn't align with our cultural practices no matter our beliefs.

The circumstances leading to the tentative, initial support for the hunt, predicated on concerns over vehicle collisions with moose in specific areas of the Fairbanks Non-Subsistence Area, fail to address the core issues at hand. Initially preoccupied with concern for vehicle collisions and injury to humans as well as moose, our advisory committee supported this proposal seeing it as the only solution available; however, upon further consideration and a remembrance of our traditional beliefs our committee and Elders, now stand in firm opposition to the antlerless moose hunts. This reflection is not a reversal but a *reassertion* of our traditional values and an acknowledgment of the need for solutions that do not compromise our ecological and cultural integrity.

The most recent data collected from the department shows a meager 7,000 moose in Unit 20B with a management objective of 12,000-15,000. The current low density moose population in Unit 20B cannot afford any additional hunts and the department must take every effort to ensure the rebound of this population.

5 AAC 99.025 provides a positive customary and traditional use determination for moose in Unit 20B with an amount reasonably necessary for subsistence uses being 75-100 outside the Minto Flats Management Area and 20-40 within the Minto Flats Management Area. This population provides the subsistence needs for many communities within the management unit including Minto and Nenana.

5 AAC 99.019 protects the right for Alaskans to harvest moose for religious ceremony- a statute that aids in ensuring our Alaska Native people (not specified but our Tribal citizens as residents of Alaska) have access to this resource for traditional, ceremonial use. The only caveat to exercising this right is if the population gets so low that the department denies requests for religious and ceremonial take of moose.

For 10,000 years the people of the Interior have relied on moose for both religious ceremony as well as food security. With the ongoing, seemingly everlasting, declines of salmon populations, continued closure of commercial fishing opportunities on the Yukon River and throughout the drainage, restrictions on species-specific salmon fishing that affects our cultural ceremonies, a continued lack of access to affordable groceries within our villages, and the most recent decision by the Commissioner to put a seven-year moratorium on all Chinook salmon fishing on the Yukon River, our people are experiencing extreme food insecurities that without proper resource management could remove our relationship to the animals that we have cultivated relations with for generations.

We urge the Department of Fish and Game to reconsider the use of antlerless moose hunts as a management tool. The rationale provided, centered on mitigating vehicle collisions, overlooks the broader ecological and cultural ramifications of such actions. It is a nearsighted solution to a problem caused by human development. We assert that the moose should not bear the consequences of human infrastructure decisions that have disrupted their natural habitat.

Furthermore, the department's admission of insufficient moose populations to justify the opening of such hunts, even as it proposes them as a solution to vehicular collisions, is contradictory and undermines the sustainability of moose populations. The killing of cow moose is not merely the removal of an individual from the ecosystem but the eradication of potential future generations. Our people honor the animals that continue to provide growth to the population and sustain our peoples' spiritual and physical needs.

In light of these concerns, we propose the following alternatives for moose population management:

1. Incorporation of Indigenous Knowledge
2. Enhanced Aerial Surveys
3. Secured Funding for Moose Surveys
4. Development of Alternative Management Methods

We advocate for a management approach that respects our cultural traditions, conserves moose populations for future generations, and addresses the root causes of human-moose conflicts.

PROPOSAL 179

Shift the moose season dates for Unit 20B to September 15th-30th.

Comments:

MNAC suggests the department takes no action on Proposal 179 to shift the moose hunting season in Unit 20B to September 15th- 30th, but consider the implementation of a statewide regulation that would address issues hunters are not facing with climate change.

Being that Unit 20B already experiences a surge of 3,000 hunters per year, the Unit experiences enormous pressure. Therefore, if this proposal were to pass and make Unit 20B the only unit with a late season, it would encourage hunters to come to Unit 20B to hunt after harvesting in another unit during the earlier season dates.

PROPOSAL 210

Change the boundary of the Nenana River

Comments:

MNAC stands in opposition to Proposal 210, which seeks to alter the boundary of the Nenana River, thereby reclassifying a portion of Unit 20A as 20C. This change, we believe, would undermine the traditional practices and constitutional rights of our communities.

Echoing the concerns raised by the Tanana Chiefs Conference (TCC), we find the proposal problematic for several reasons. Primarily, it threatens to prohibit the taking of cow moose for religious ceremonies, including funeral and memorial potlatches. Under the current designation, residents within Unit 20A are granted the flexibility to harvest either a cow or bull moose for these potlatches. The proposed shift to Unit 20C's classification would, however, introduce an unnecessary restriction, infringing upon the constitutionally protected right to take moose out of season for Alaska Native funeral ceremonies as delineated in 5 AAC 92.017 and 5 AAC 92.019.

Moose play an integral role in our ceremonies, marking both moments of mourning and celebration. Their significance transcends the mere act of hunting; they are a cornerstone of our spiritual and cultural identity, representing a bond with nature that is difficult to articulate in scientific or regulatory terms. This bond underscores the importance of moose availability for ceremonial purposes throughout the year.

The decision to hunt a cow moose is never taken lightly. It is embedded in a series of ritualistic activities that honor the life being commemorated. The act of hunting is not merely for subsistence but is a profound gesture of respect and recognition for the individual's role within our community. This tradition is especially poignant in the context of the declining salmon populations, underscoring the urgency to preserve our remaining natural resources for future generations.

Our stance against Proposal 210 is rooted in a deep-seated need to protect our way of life, our religious freedoms, and our relationship with the land and its creatures.