### FROM VILLAGE OF KOYUKUK

We, the undersigned oppose the Alaska Fish and Game Proposal 94 to allow the use of aircraft for hunting moose including transportation of moose hunter, their gear and/or moose parts. Elimination of the Koyukuk Controlled Use Area will further suppress the moose population below sustainability.

	Name	Address	Signature
ı	CintyPilot	P.O. Box 33 Knyukuk, AK 99754 (	Lieg Pites
2 ,	SHANDA KRISKA	POBOX Z YOYUKUK, AK 99754	well
3	Kenny Bree	Koyu Kuk All 99754 K	not Green
4	LUCIA A. DIXON	Kayukuk AK 99754 C	Julia a Dilu
8	Stotlin E. Moses	P.O. Box 13 Koyuhuk AK 99754	thin E. Moses
6	Douglas Pa	ytankovukukiAks Do.	shar had
7	Peccy Louitz	PESTOS Kyu AK (7754)	10mg 18
8	Harold D Yatlin	PoBox 54035 Kyn AK	99754 Hardle Tell
9	V	tan Gen, Del Kyu, Ak 99	754 Caroll Hutste
10	Louis Grant	Bux 18 Kuyuku	Le Ale 99754
t.a	Eliza Jones	Elizaber koy	akuk, AK 99754
1/Z	BENEDICT JONES	Senedict Grenes Koyuku	0. BOX 47 KIAK. 99754
13	PAT MADROS	Pate Mela BB	35 410 31C
14	Cerelia Grant	Coolings P.O. Bux	18 1K,AK 99754
15	Mantha Dayton	BOXI3KYY Alc Y	Wartha Dayton
14	Leo Colvin	PO. Box 12	a the
17		Por Box 31	son Male A
18	Mary Malemute	FIO. BOX 51 Koyukuk, AK 99754 M	arymalomite
19	DAVIO DAYTON	POBOX 32 Kajukuk AK 99754	Mailyto
20		P.O. Box 13 Koyukuk, 4K 94	7954 Josephine M. Daylor
21	FranklinDay	P.O. Box 13 Koyukuk, 4k 99 Horse Box 13 Kayukuk.	AK Franklindaytorse

We, the undersigned oppose the Alaska Fish and Game Proposal 94 to allow the use of aircraft for hunting moose including transportation of moose hunter, their gear and/or moose parts. Elimination of the Koyukuk Controlled Use Area will further suppress the moose population below sustainability.

		Address	Signature
27	April One Dayton	P.O. Box 65 Koyukuk, AK 997	54 April O. Daylor
23	FRNE G Esmalka	JR POBOX 37 Kopukak AK 99-	184 Eine 6 Carellet for.
24	Ethel Esmo	rik Box 37 KoyuKa	K- Estel Emoil ko
25 0	Poy Nelson P.D.	Box 15 Koyakuk, Ak 99757	En Delan
Z.(#	Agnes S. Dayton	P.O.Box 54069 Koyukak, Ak.	99754 Og Sout
27	Sarah B. Dayton	P.O. Box 11 Koyykyk, Ak 9975	4 Sarah Blays
28	Kenneth Krish	ce PO BXII Koyutuk A	1 99734 Kamal Kris
29	marion &	Puntington Koyuki	MCON.MARIONE)
			Huemlingt
30	Marie Dayton	Marie Caylon P.C.	132 14 Kok, AK99754
3/	Oscar DAY	ON THAT KONVEYE	AK 99754
3 <sub>2</sub>	Dadene Pulat	Pro. Box 12 Koyukuk,	AK 99754
33	Wayne Dayford F.	O, Box 52 Kark. K. Alas	da 9934
34	Glund Brewn	P.D. Box 14 Kayakak AK	99754 Slean 1/Sia
35	Tom Kriska	Tom Kuska 855	Chena Hills Dr FBK
30	Tom Huntingt	on Box57111 NoAhPole, AX	: 99705 T-HJ-
			/

#### Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management 101 12th Avenue, Room 110 Fairbanks, Alaska 99701

Phone: 1-(907)-456-0277 or 1-800-267-3997 Fax: 1-(907)-456-0208

E-mail: Vince\_Mathews@fws.gov

February 29, 2008

Alaska Board of Game Alaska Department of Fish and Game P.O. Box 115526 Juneau, Alaska 99811-5526

#### Dear Board of Game:

The Western Interior Alaska Subsistence Regional Advisory Council during its public meeting on February 28, 2008 discovered the need for the Alaska Board of Game to adopt a positive customary and traditional use determination for the long-practice of harvesting black bears from dens using artificial light in Units 21 and 24. The Regional Council is composed of recognized subsistence leaders across the Western Interior Region (Units 19, 21, and 24) and they all recognize harvesting black bears from dens is a long practiced customary and traditional use practice. The Regional Council requests the Board to adopt a positive customary and traditional use determination for this practice in Units 21 and 24.

I, as Regional Council Chair, will also share this request during my time testifying before your Board. Thank you for your timely action on recognizing this important traditional use.

Yours truly,

Jack Reakoff, Chair

cc: Western Interior Regional Council members Chuck Ardizzone, Board of Game Liaison, Office of Subsistence Management Affected villages of the Western Interior Region

RC58

#### Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management 101 12th Avenue, Room 110 Fairbanks, Alaska 99701 Phone: 1-(907)-456-0277 or 1-800-267-3997

Fax: 1-(907)-456-0208
E-mail: Vince Mathews@fws.gov

February 29, 2008

Alaska Board of Game Alaska Department of Fish and Game P.O. Box 115526 Juneau, Alaska 99811-5526

Dear Board of Game:

The Western Interior Alaska Subsistence Regional Advisory Council during its public meeting on February 28, 2008 reviewed the Interior Region wildlife proposals before the Alaska Board of Game. Below are the recommendations adopted by the Regional Council. The Regional Council Chair will be providing oral testimony on these proposals during the Board's meeting on February 29 – March 10.

<u>Proposal 11</u> Close the nonresident caribou season in Units 19A and 19B.

The Regional Council unanimously passed a vote of confidence to support their proposal. We feel the precipitous decline must be proactively arrested. Current regulations currently are not addressing the rapid decline and the extremely low bull/cow ratios. The current harvests levels of bull caribou are beyond the sustainability of the herd. The herd's continuing decline will add to the hardship of our region's residents who are also enduring moose hunting moratoriums in Unit 19A and 19B.

**Proposal 49** Establish a 5-day "To be Announced" moose season on Native lands in Unit 21B below the Little Mud River to be opened concurrent with Federal hunts during the period of Dec. 1 – March.

The Regional Council unanimously passed a motion to endorse their proposal. Winter moose hunting is a customary and traditional time to take moose. Rural residents are incurring very high fuel and other costs. The State of Alaska is the managing agency on private lands currently, the Board of Game must provide subsistence opportunity on the Native lands. The owners of the Native lands should not have to incur great expense crossing, and be excluded from opportunity of using their own lands during a Federal hunt. A contiguous and concurrent State hunt will be easier and more economical for the hunters and enforcement to delineate and participate in.

<u>Proposal 50</u> Establish a Sept. \*1 - 4 and Sept. 26 - Oct. 1 moose seasons for any bull on Native lands in Unit 21B, downstream of the Little Mud River.

The Regional Council unanimously passed a motion to endorse their proposal with the amendment to correct the typing error \* of a September 1 start date. The intent of the proposal was to have concurrent State season with the adjacent Federal season that has a Sept. 5 starting date. Native Alaskans will continue to be excluded from the opportunity to subsistence hunt on their own lands as provided by Congress in ANILCA title VIII Sec. 801(1). The Federal public lands AND Native lands, are to have a rural priority. The State of Alaska is the managing agency on private lands currently, the Board of Game must provide subsistence opportunity on the Native lands. The Federal Subsistence Board has recognized a need for a Bull Moose season extension for the described area. The owners of the adjacent Native lands should not have to incur great expense crossing, and be excluded from opportunity of using their own lands during a Federal hunt. A contiguous and concurrent State hunt will be easier and more economical for the hunters and enforcement to delineate and participate in.

<u>Proposal 51</u> Establish a bulls-only March "To be Announced" bulls only moose season in Unit 21D, Koyukuk Controlled Use Area (CUA).

The Regional passed a motion to support this proposal. There is a definite need for a winter moose hunt for this area to assist local hunters who were unable to harvest a moose during the fall season. Passage of this proposal would address a need for local residents and due to the location of the hunt and time of the hunt there would be minimal increase in harvest.

<u>Proposal 59</u> Establish a late fall moose hunt (Sept. 26 – Oct. 1) on Native lands in the Kanuti Controlled Use Area of Unit 24B.

The Regional unanimously endorsed their proposal. Native Alaskans will continue to be excluded from the opportunity to subsistence hunt on their own lands as provided by Congress in ANILCA title VIII Sec. 801(1). The Federal public lands AND Native lands, are to have a rural priority. The State of Alaska is the managing agency on private lands currently, the Board of Game must provide subsistence opportunity on the Native lands. The owners of the adjacent Native lands should not have to incur great expense crossing, and be excluded from opportunity of using their own lands during a Federal hunt. A contiguous and concurrent State hunt will be easier and more economical for the hunters and enforcement to delineate and participate in.

<u>Proposal 62</u> Establish a winter "To be Announced" season in Units 24C and 24D on Native lands in the Koyukuk Controlled Use Area.

The Regional unanimously endorsed their proposal. Late winter moose hunting is a customary and traditional time to take moose. Rural residents are incurring very high fuel and other costs.

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<u>Proposal 63</u> Change moose registration permit hunt season dates in Units 24C and 24D Koyukuk Controlled Use Area from Aug. 27 - Sept. 20 to Sept. 1 - 27.

The Regional Council unanimously supported this proposal with the amendment to have the season end on Sept. 25. Shifting the hunting period to be later in fall would provide more reasonable opportunity for subsistence hunters to harvest their moose when there are cooler temperatures. A later season would also address the change of moose movements to later in September.

Proposal 78 Allow the taking of any black bear from their dens in Units 21 and 24.

The Regional Council unanimously supported this proposal. Passage of this proposal would allow a customary and traditional use to be allowed. This long-term traditional practice occurs throughout the Western Interior Region and the Regional Council highly supports it being recognized and provided protection in regulation. The Regional Council requests a positive customary and traditional use determination for this long practiced tradition.

Proposal 79 Allow the taking of black bear from dens in Units 21 and 24 using artificial light. The Regional Council unanimously supported this proposal. Passage of this proposal would allow a customary and traditional use to be allowed. This long-term traditional practice occurs throughout the Western Interior Region and the Regional Council highly supports it being recognized and provided protection in regulation. The Regional Council requests a positive customary and traditional use determination for this long practiced tradition.

<u>Proposal 85</u> Provide for a longer resident hunting season for Dall Sheep in Region III.

The Regional Council unanimously supported this proposal. Passage of this proposal would provide an additional opportunity for resident hunters and a two day resident priority. The addition of two days may also improve resident hunting success rate.

<u>Proposal 88</u> Reduce the size of the Upper Kuskokwim Controlled Use Area to a 5-mile wide corridor along the Kuskokwim River from the Black River to the Swift Fork, and along the Takotna River to Takotna and along the South Fork to Nikolai.

The Regional Council unanimously opposed this proposal. The Upper Kuskokwim Controlled Use Area is essential to providing a reasonable opportunity for local residents to harvest their moose. Results from establishing this CUA are only beginning to be seen and reducing the CUA size will jeopardize the current improvement in the moose population. It will also be difficult to determine a five mile corridor and could lead to abuse of airplanes sharing information of moose locations to hunt camps within the river corridor. The current CUA reduces user conflicts and provides a more level playing field

between hunter groups. Moose do not confine themselves to corridors. Large bulls are often found outside the corridor early in the season and move to rivers late in the season.

<u>Proposal 94</u> Eliminate airborne prohibition for moose hunters in the Koyukuk Controlled Use Area in Units 21D and 24D.

The Regional Council unanimously opposed this proposal. The Koyukuk Controlled Use Area is essential to maintaining a fair balance between local subsistence needs and sport hunting. The CUA is a critical king pin to the Koyukuk River Moose Management Plan was an essential compromise between the users groups during the deliberations of the Koyukuk River Moose Hunters Working Group. Removal of this CUA will return the times of high tension between the users group, a reduced quality hunt experience, and increased pressure on the moose population.

Thank you for the opportunity to share recommendations and comments on proposal important to subsistence users of the Western Interior Region.

Sincerely,

Jack Reakoff, Chair

cc: Western Interior Regional Council members Chuck Ardizzone, Board of Game Liaison, Office of Subsistence Management Affected villages of the Western Interior Region

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c/o Office of Subsistence Management 101 12th Avenue, Room 110 Fairbanks, Alaska 99701 Phone: 1-(907)-456-0277 or 1-800-267-3997

Fax: 1-(907)-456-0208 E-mail: Vince\_Mathews@fws.gov

February 29, 2008

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Thank you for the opportunity to share recommendations and comments on proposal important to subsistence users of the Western Interior Region.

Sincerely,

Jack Reakoff, Chair

cc: Western Interior Regional Council members Chuck Ardizzone, Board of Game Liaison, Office of Subsistence Management Affected villages of the Western Interior Region February 27, 2008

Alaska State Board of Game Kristy Tibbles-E.D., Cliff Judkins-Chairman P.O. Box 25526 Juneau, AK 99802

#### Dear Board Members:

At a regional meeting held in Bethel on February 25 and 26, 2008, representatives from the five Advisory Committees (AC's) with jurisdiction in this area, including 4 of the chairman, met in Bethel to discuss deferred proposals 4 through 7 for GMU 18.

Consistent with the recommendations provided from their 2007 AC meetings, that there was insufficient information provided or available to make a comprehensive determination on such an important issue, the Group unanimously recommended that the Board, pursuant to 5AAC 96.200-250, remand the Amounts Necessary for Subsistence (ANS) moose in proposal #7 to a planning process for establishing a Yukon Kuskokwim Delta Moose Management Plan. Uncertainty surrounding practical applications in this matter were/are further complicated by the Board's expressed reasons for deferral of the issue at its November, 2007 AYK meeting. That ANS for GMU 18 moose would be addressed under its potential effects to or with neighboring GMU's of 19A-B & 21E. None of the AC's directly affected have had the opportunity to address the proposals in this context, and without clear notice to this effect, one could not logically expect people or AC's from different regions to infer that this would be happening.

This recommendation is also consistent with further Board member statements regarding deferral intent; to allow Wildlife Conservation and Subsistence Division staff and area managers the opportunity to compile additional information, and also in the interim, meet with stakeholders of the region to develop fuller understanding and recommendations on the matter. These meetings have not yet occurred. Such an action is also fully deserving and in keeping with previous Board precedent through similar programs for the Central Kuskokwim, Innoko River, and Koyukuk River Moose Management Plans. Compounding the level of these concerns, is that the 5 year moose hunt moratorium in the Lower Kuskokwim is also set to expire this year. This issue must be resolved at the regional level, prior to a possible re-opening of this moose hunt in the fall of 2009.

While we recognize that this recent meeting was not formally noticed or sponsored in full compliance with the Administrative Procedures Act, all AC's included in 96.210(a)(4) for the Western Alaska resource management region were in full agreement on this recommended action. Members present also selected Bob Aloysius to serve as Chairman pro-tem for the Western Regional Council, until such time as APA criteria are met. For the purposes of this management planning effort, the Board should also consider including the Advisory Committee for GMU 21E into this process - pursuant to 5AAC 96.210(c) - along with the Western Regional Council.

Finally, the group agreed with the justification provided for proposal #4 and voted to support it, took no action on proposal #5, and did not reach consensus on proposal #6.

We urge your positive consideration and action regarding our recommendations on these far reaching issues presenting such huge impact to the people of our region for generations to come. Sincerely,

Bob Aloysius, Chairman Pro-Tem

SOA Western Regional Fish & Game Advisory Council

Myron P. Naneng, Sr., President Timothy Andrew, Wildlife Resources Director Association of Village Council Presidents

**Division of Natural Resources** Natural Resources Department PO Box 219 • Bethel AK 99559

Phone (907) 543-7300 • Fax: (907) 543-5702



Akachak Akiak Alakanuk Andreafsky Aniak Atmautluak Bethel

Bill Moore's Sl.

Chefornak Chevak

Chuathbaluk Chuloonawick

Crooked Creek

Eek

Emmonak Georgetown

Goodnews Bay

Hamilton Hooper Bay

Lower Kalskag

Upper Kalskag

Kasigluk

Kipnuk

Kongiganak Kotlik

Kwethluk

Kwigillingok

Lime Village

Marshall

Mekoryuk Mtn. Village

Napaimiut

Napakiak

Napaskiak Newtok

Nightmute

Nunakauyaq

Nunam Iqua

Nunapitchuk

Ohogamiut

Oscarville

Paimiut

Pilot Station Pitka's Point

Platinum

Quinhagak Red Devil

Russian Mission

Scammon Bay

Sleetmute

St. Mary's

Stony River Tuluksak

Tuntutuliak

Tununak

Umkumiut

#### DRAFT AGENDA

AVCP Regional Meeting - ONC Multipurpose Building, Bethel 1:00pm, February 25-12:00pm, February 26, 2008 Board of Game Deferred Proposals for YK Delta/GMU 18

Proposal #7: Review Amounts Necessary for Subsistence [ANS] Moose Harvests. Proposal #'s 4-6: Close non-resident hunt and reduce caribou season. The Board of Game(BOG) considered these proposals during the Fall 2007 regional meeting in Bethel and deferred them to the Spring 2008 meeting in Fairbanks. A stated purpose for these deferrals was to allow the department time to meet further with stakeholders, and gather more information on how this finding could affect pending regulatory action(s) in surrounding Game Management Units of 17, 19 and 21.

- Welcome/Invocation Tim Andrew, AVCP NR Dept., Facilitator
- Issues affected by ANS determinations: Current/future administrative hunt status, 2. (Open, Tier I or Tier II etc.) - Greg Roczicka, ONC NR Dept., former BOG member.
- 3. GMU 18 moose population status (Lower Yukon, Lower Kusko, Goodnews/Kanektok); DWC recommendations to November, 2007 BOG meeting: Phillip Perry - ADFG Area Management Biologist.
- 4. Overview of available subsistence harvest information, history of current ANS #'s and options in population determinations: Jim Simon - ADFG Subsistence Division.
- 5. Regional Advisory Committee recommendations: Lower Yukon, Central Bering Sea, Lower Kuskokwim, Central Kuskokwim, Stony/Holitna.
- 6. Proposal #7 discussion/recommendations.
- Proposal #'s 4-6 (Mulchatna caribou hunt status) discussion/recommendations.
- Adjourn.

February 27, 2008

Alaska State Board of Game Kristy Tibbles-E.D., Cliff Judkins-Chairman P.O. Box 25526 Juneau, AK 99802

#### Dear Board Members:

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Akachak Akiak Alakanuk Andreafsky Aniak Atmautluak Bethel

Bill Moore's Sl. Chefornak Chevak

Chuathbaluk Chuloonawick Crooked Creek Eek

Emmonak Georgetown Goodnews Bay Hamilton-

Hooper Bay Lower Kalskag Upper Kalskag Kasigluk

Kipnuk Kongiganak Kotlik

Kwigillingok Lime Village Marshall

Kwethluk

Mekoryuk Mtn. Village Napaimiut

Napakiak Napaskiak

Newtok Nightmute Nunakauyaq

Nunam Iqua Nunapitchuk

Ohogamiut Oscarville

Paimiut Pilot Station

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Quinhagak Red Devil

Russian Mission Scammon Bay

Sleetmute

St. Mary's

Stony River

Tuluksak Tuntutuliak

Tununak

Umkumiut

#### DRAFT AGENDA

AVCP Regional Meeting - ONC Multipurpose Building, Bethel 1:00pm, February 25-12:00pm, February 26, 2008 Board of Game Deferred Proposals for YK Delta/GMU 18

Proposal #7: Review Amounts Necessary for Subsistence [ANS] Moose Harvests. Proposal #'s 4-6: Close non-resident hunt and reduce caribou season. The Board of Game(BOG) considered these proposals during the Fall 2007 regional meeting in Bethel and deferred them to the Spring 2008 meeting in Fairbanks. A stated purpose for these deferrals was to allow the department time to meet further with stakeholders, and gather more information on how this finding could affect pending regulatory action(s) in surrounding Game Management Units of 17, 19 and 21.

- Welcome/Invocation Tim Andrew, AVCP NR Dept., Facilitator
- Issues affected by ANS determinations: Current/future administrative hunt status, 2. (Open, Tier I or Tier II etc.) – Greg Roczicka, ONC NR Dept., former BOG member.
- 3. GMU 18 moose population status (Lower Yukon, Lower Kusko, Goodnews/Kanektok); DWC recommendations to November, 2007 BOG meeting: Phillip Perry – ADFG Area Management Biologist.
- 4. Overview of available subsistence harvest information, history of current ANS #'s and options in population determinations: Jim Simon - ADFG Subsistence Division.
- 5. Regional Advisory Committee recommendations: Lower Yukon, Central Bering Sea, Lower Kuskokwim, Central Kuskokwim, Stony/Holitna.
- 6. Proposal #7 discussion/recommendations.
- Proposal #'s 4-6 (Mulchatna caribou hunt status) discussion/recommendations.
- Adjourn.

Rileo

#### Stony Holitna Advisory Committee Testimony – (SHAC)

#### March, 2008 BOG Meeting

#### Given by Doug Carney, Chairman -

#### Intro -

- Chairman of newly created Stony Holitna AC former chair of Central Kusk. AC
- resident of 19A Holitna, Hoho, Sleetmute --closure area\
- Homesteaded there early 70s subsistence hunter and trapper, and registered guide

Thank BOG for its part in adopting proposal to split old CKAC- into new CKAC & SHAC. SHAC -1<sup>st</sup> meeting in Feb. - Quorum/elections, info. meeting -comments on proposals

#### Proposals 13,100,101,103 are from CKAC —at last meeting on Dec 3.

- 13 –extension of closure in Holitna drainage into river area of 19B
- 103 denning of wolves add no closed season & no salvage requirement
- 100 –hunting of any bears at any time in Unit 19 IMAs
- 101 extension of 19A predator management program past 2009

Residents in 4 villages that SHAC represents have solidarity in supporting the moose closure, as well as supporting these 4 proposals, as well as other proposals that SHAC supports

AC comment #7 -SHAC comments

**RC 45 - Sleetmute Traditional Council** 

comment 23 - Red Devil TC

comment 54 - Stony River TC

comment 55 - Lime Village TC

SHAC and people in our area support predator management statewide, and we thank BOG for its tireless efforts. SHAC opposes proposals that are against it. This is reflected in our voting. SHAC comments on these proposals are in the record — <u>AC comments # 7</u> -so I'll discuss the more contentious and important proposals.

Support 8,9,13,82,83,99,100,101,103,104,105,112,137,138

Oppose 11,12,14,87,88,102,106,113

**7- Took no action** - Changing ANS in Unit 18 -/ confusing and how it will affect GMUs 19, 21, & 17. The Western Regional AC met and discussed this a few days ago. We ask BOG to address when it does the McGrath Area proposals. ask that this proposal be deferred again till method of setting ANS numbers can be explained, understood, and then can be relayed to the people we represent.

10 – Took no action – made no sense as written/ if same as 12 & 14 – strongly oppose

12 &14 — spike/fork . Since the author of#14 couldn't get a moose, more restriction, not liberalizing hunting regs. is the answer. SHAC thanks Johnny Evan for giving more evidence in the need for closure.

10,12, & 14 are in opposition to 13 and what the local people and SHAC want to see. Not surprisingly, all 3 of these proposals were made from people who live outside of the area

#### 13 -RC 46 - Discussion / Included in RC 46 -

- Main points for extension & 19B harvest last 2 years.
- Comments of ADF&G along with SHAC answers to Dept. points of opposition
- A paragraph on what would be the simplest & most effective solution.
- A color map of 19A showing where the different moose hunting regulations apply
- 2 documents sent to Troopers typical examples of type of violations/claim to hunt in 19B, but hunting in 19A.

#### This CKAC proposal has support of -

- 4 village Traditional Councils
- FBX AC (AC comment #3),
- Alaska Dept. of Public Safety.

<u>Holitna Drainage</u> – largest, deepest, most navigable in the Kuskokwim watershed – 2 rivers running parallel with lakes in between.

and tundra between them -Best habitat for moose in Kusko drainage and was most prolific for years. 19A &B – For years had the largest subsistence harvest of moose in GMU 19, and one of the largest in Alaska.

CKMMP – 2004 -People of area voluntarily gave up their 2 winter seasons to help get predator management program in place.

2006 -People from 4 upriver villages (<u>advocating closure/not Tier II)</u>, went to spring, 2006 BOG Broad support of locals -Predator control & closure are best and most effective for moose recovery. At that meeting - in STCs proposal 64, and CKAC proposal — the Holitna Drainage 19B rivers closed to moose hunting along with 19A.

#### Scan the main points list & add -

Same moose stocks & same wolf stocks.

Predator management programs may be stopped by the "Antis." Maximize it while it's available. The people who are most directly dependent on theses moose stocks are willing to give up their right to hunt — WHY should it be open??

The CKMMP got the approval of local user groups that allowed hunting of moose stocks that should have been protected. At the 2006 BOG meeting, this was an mistake that was admitted to – as far as upper 19a is concerned. The area of 19B we are discussing

Look at RC 46 – and see if there are any points that need clarification.

**87** – RC 44 – ADF&G pages discussing the Holitna-Hoholitna CUA effect on Unit 18 hunter success. The CUA was a response to a lawsuit – an attempt to limit nonresident hunters. Meat had been spoiled by floater hunters who were accessing area by airtaxi.

The issues discussed in RC 44 have not changed, nor have the reasons for the 40 HP limit.

Nothing has changed since the CUA was put in place, except that the moose population is down, and predator populations have been up. When this is considered, any regulation change that would tend to bring more hunting pressure to the area with conditions as they are now, would be a mistake.

- There was a **safety hazard** with the large, deep draft, high horsepower boats with large wakes on narrow rivers swamping the smaller ones.
- Erosion of river banks for the same reasons
- Damage of spawning beds for the same reasons
- The 40 hp requirement gives all boat hunters **equal opportunity and access**. Larger, louder, faster boats covered larger stretches of the rivers, particularly in high-water years, making moose more wary and moving them further from the river. Hunter success for Unit 18 hunters actually increased when smaller hp boats began to be used.

Proposal 100 - <u>Support Unanimously</u>. Intensive management!! This is another way to reduce bear populations and moose calf predation. Taking females and cubs makes predator management of bears much more efficient, and cost effective, and effective for a longer period of time. With moose closure, not as many guides operating in area & taking bears. The McGrath bear removal didn't touch sows or sows with cubs, and the decline of calf survival rates is happening more quickly, as these young animals have grown. Pred. management in other countries is done this way, and it is very effective.

Proposal 101 - <u>Support Unanimously</u>, with an amendment to change it from 6 years to five years, so the program coincides with the Region III cycle. The predator management program in GMU19A has been one of the most effective in the state. <u>This program along with the moose closure is proving to be a very effective one, and should be no surprise to any rational human.</u>

Proposal 102 - Oppose Unanimously. Of course there has not been a higher harvest of moose!—How could there be? The people living in the area are the ones who campaigned for the closure. Moose are not being hunted in the portion of 19A where there is a closure, and Tier II in most of the rest of the GMU. Besides these facts, which are printed in black and white in the regulation book, turning around a moose population that was virtually destroyed after 11 years with no predator control program takes more than 3 or 4 years. This is the opposite of what the committee is trying to accomplish. Do the authors of this proposal really believe the aerial predator control is ineffective?—I doubt it. And if these programs are so expensive now, then requiring state employees to do it would cost taxpayers much more.

Proposal 103 - Support Unanimously. Intensive management !!This is already a legal activity. There is an ongoing assault on Alaska's predator management programs, through legislative and judicial means, and ballot initiatives. If those very effective programs employing aircraft are interrupted, curtailed, or stopped, there are few other methods available to manage predator numbers. Adopting this proposal would give the state another effective too - one that has been used traditionally in Alaska for many years in the past. I and SHAC would amend this to include "no closed season" and no salvage requirement.

public comment proposal \$86

Alaska Department Game Board Dear Sir's,

2/29/2008

I am writing in regard to the Denali Block proposed refuge site at Tangle Lakes. My husband and I were at the meetings last year and they decided to put it aside until this year. I had to come to Reno for surgery for a complete shoulder replacement and for a month of therapy. So we are not able to attend the meeting that you now have going on. Let me refresh your memory We live at Tangle Lakes from mid April until October 1st we built and own Tangle River Inn for over 38 years. My husband and his parents went in by dog team in the early fifty's before there was a road and on a T and M site started a business that has been in the family for over 50 years. We have watched for years the government watch over the land now we have every agency taking pieces I think there are about 10 of them a block here and a block there. As I have stated in my letter of the 2007 meeting and also turned in many signatures from the people that are against this proposal. Last summer we collected many more that are in our winter home in Delta Jct. We have three refuge property's on the Denali Highway and one at Paxson Lake We think that is enough. The caribou do not migrate in that back country and the snow is too deep for the moose. Check it out and also check out the real reason they want that piece of property. They had a speaker there last year from Nevada star that has some mining claims 40 miles back in check it out it is on the tapes also. I hope you will take the time to consider this. Naidine Johnson

Box 783 DeHadunction, Mc. 99737

RC62

March 1, 2008

Alaska Board of Fish and Game

RE: Unit 20A Antlerless Moose Hunt

Dear Board Members,

I have traveled and hunted in Unit 20A for the past 28 years, and through all seasons, via airplane, airboat, and snowmachine. During general moose hunting season I spend an average of 23 days hunting this area and just enjoying the Alaska wilderness.

During moose season, I travel as much as 25 miles south of the Tanana River, deep into the heart of 20A and have noticed a steady decline of moose in this unit since the antierless hunt was initiated. I am concerned about the toll it is taking on the moose population.

The biologists talk of reducing the moose population because of lack of vegetation. What I see exploring the countryside up close is there is plenty of browse through the winter months, and ponds, and creeks and rivers create unlimited vegetation through spring, summer and fall.

Also of concern are inaccurate moose counts. The biologists said the moose counts were bad in 2006, and there was no count in 2007. There are no good numbers to justify the continued devastation of this moose herd. I am strongly opposed to killing cows, and would like to see an investigation into current moose counting methods and accuracy. Occasionally passing over Unit 20A with aircraft has proven that this is not a good method to evaluate counts, conditions, vegetation, predation, etc. These numbers are not realistic from what I'm seeing on the ground.

Biologist Don Young recently claimed he is working under a "Mandate" controlling the moose populations, and is trying to achieve those numbers in order to avoid litigation. I would like to know what that mandate is, who set a mandate, and why there is a mandate in the first place. Whoever is responsible needs to get on the ground in this area so they can see first-hand that this unit can support higher populations, and that quite possibly their so called "mandate" is not relevant to this area.

In closing, I would like to again state that I strongly oppose cow hunts until such time specific and accurate data supporting that the numbers and vegetation are relevant. I would like to see a return to the previous management standards for Unit 20A, that supported a healthy mix and number of cows, calves and bulls of all sizes for many years.

Sincerely,

David J. Miller P.O. Box 81149

Fairbanks, AK 99708

907-388-3444

Comments to the Alaska Board of Game on Saturday, March 1st, 2008

Alaska Residents and hunters in opposition to Advisory Committee changes to Proposals 130 & 131: reauthorization of antlerless moose hunting in 20A and 20B

Members of the Alaska Board of Game,

We, the names listed below, are writing to you today to express our opposition to the actions of the Advisory Committees (ACs) from Fairbanks, Delta, Middle-Nenana, and Healy in their attempt to blackmail the Alaska Board of Game by placing conditions on their approval to reauthorize the 20A and 20B antlerless moose hunts. We are specifically opposed to the following conditions that the Advisory Committees have placed on reauthorization:

- 1. The ACs' proposal restricts the bag limit to only allow cows unaccompanied by a calf to be harvested. We are opposed to this restriction because it makes it very challenging in the field for hunters to identify a legal animal—it will result in many hunters making mistakes. We are also opposed to not being allowed to harvest calves. It is very common for several of us to go hunting together and take a cow and her calf, providing the perfect amount and quality of meat for a small group. Hunting calves is also a great way for lone individuals to take a moose without the burden of dealing with hundreds of pounds of meat. Calves are the best eating meat and the most "at risk" part of the population from a biological standpoint.
- 2. The ACs' proposal redefines the hunting zones in 20A and closes several subareas to the taking of antlerless moose. We find the proposed new boundaries and closures to be ludicrous and reflective of the interests of specific user groups, the ACs, and their agendas. Finding these new boundaries in the field would require the use of GPS and we do not feel that this is something we should be forcing upon hunters. We support the existing zones and prefer that bag limits and season lengths are adjusted to meet ADF&G management goals and that these limits and seasons be created based on biological factors. We agree that it is time to lower antlerless harvest quotas in 20A.

We do not feel that the interests of hunters using the antlerless registration permits are being considered or heard at the Advisory Committee level. The ACs are becoming a repository and means for special interest groups to gain access and leverage into the game management decision making process. We feel that the objectivity of the ACs and their interest in representing all of the hunting public has been lost. We believe that game management in Alaska should be based on biology.

We recommend that the Board of Game vote down the conditions the ACs have placed on the reauthorization of the antlerless hunts in 20A and 20B. We realize that this will result in the ACs removing their support of antlerless moose hunting in these two subunits. However, we believe that setting the precedent of allowing the ACs to blackmail the Board of Game would have a far greater, longer reaching, impact to

hunting in this state. Thank you for your service to the public and their resources in Alaska.

#### SIGNED:

- 1. Valerie A. Baxter, North Pole
- 2. Dan Rees, North Pole
- 3. Melissa Jones-Owen, Fairbanks
- 4. Jim Owen, Fairbanks
- 5. Brett Nelson, Fairbanks
- 6. Steve Adams, Fairbanks
- 7. John C. Schaake, North Pole
- 8. Walter Smith, Fairbanks
- 9. Tim Feavel, North Pole
- 10. Brian Jennison, Fairbanks
- 11. Kelly Hochstetler, Fairbanks
- 12. Brett Moorehouse, Fairbanks

Lake Iliamna Advisory Committee Secretary Jim Tilly

Re: Prop 92, 98

These both call for a predator control management plan in unit 9 and 17. Both of these proposals are submitted by lifelong residents of these units which have seen the herds go from 30,000 to 280,000 and back. Part of the increase was from the northern migration of the northern peninsula herds and years of ideal calving conditions. Probably the biggest factor was the local trappers guides and same day air born hunters keeping the wolf population at a tolerable level.

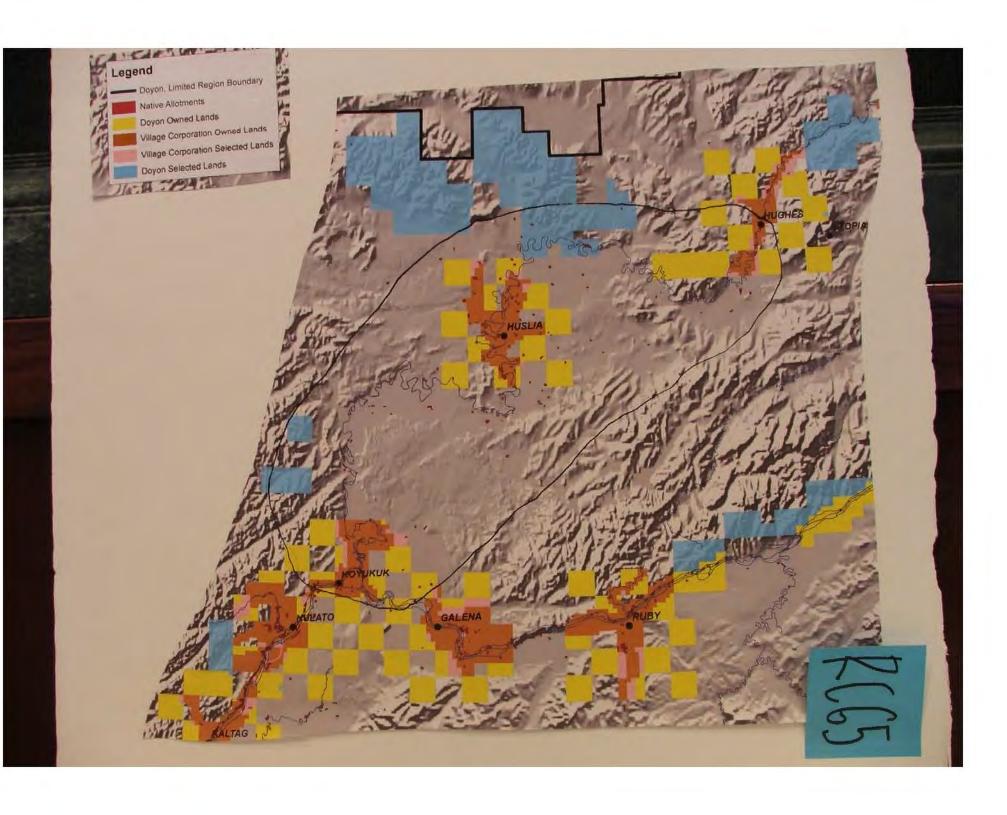
Once the herd reached peak numbers it was targeted by numerous guides, outfitters, transporters, and residents. The reason this herd got so much attention is the ongoing problems with the Nelchina herd and the seemingly disappearance of the Alaska Peninsula herd. Numerous of air taxis and transporters made the Mulchatna herd an ideal candidate for over hunting along with Tony Knowles stopping same day airborne wolf hunting. The downhill slide started in the mid-90's and ended up with our present day situation. Along with a wolf control program the subject of changing the hunt to cow only for residents and non-residents as well to give our cow to bull ratio a chance to rebound. Back in the 70's and early 80-'s before the Mulchatna herd got attached to the word caribou the bull to cow ratio was normal and was producing world record caribou and with a little help and time it has the potential to rebound. Hopefully our area biologist will support with this, but seeing as he has a small local herd almost within sight of his window, it is an uphill battle.

Thank You

Jim Tilly Personal Testimony

Caribou are pretty much extinct around Lake Iliamna now and with high predator numbers the local residents have had to concentrate on moose, and with large wolf populations, the may suffer the same fate. Any predator control program will benefit the moose as well. The reported harvest is slowly going down and the unreported harvest has dropped as well. I know this is a sore subject but it is a reality. I realize this will impact guides and transporters, but these proposals are aimed at avoiding the same situation the residents in units 9 and 17 are looking at now.

Sincerely, Jim Tilly







# ALASKA

# Sheep Management —in the— Chugach Mountains

Since the 1970s, Dall's sheep in the Chugach Mountains within subunits 14A and 13D have been managed under several different harvest strategies ranging from ≥3/4 curl to full-curl, each with the goal of allowing ample opportunity for hunters, while maintaining biologically diverse and healthy populations. Sheep in these areas have been managed under a selective full-curl harvest strategy through a general season since 1989. For 18 years, this strategy has been considered 'selfmanaging', and no efforts have been made to address the effects of this selective harvest strategy.

Recent work by Marco Festa-Bianchet, Steeve Côté, and David Coltman among others suggest that highly selective harvest strategies for big horn and thin horn sheep can result in a loss of genetic diversity, particularly under heavy harvest pressure. Festa-Bianchet has urged the sheep management community to consider the potential implications from the Ram Mountain big horn study in Alberta, where a loss of genetic diversity was observed at a harvest rate of 30% of legal rams (5-8% of all rams). Since that study began, several big horn hunts across the states have moved from some sort of selective harvest strategy (3/4, 4/5, or full curl) to an any ram management strategy to benefit population structure, genetic diversity, and overall trophy potential.

Recognizing there have been no long-term studies such as this done with thin horn rams, we believe this issue needs to be addressed given large declines in sheep and recent hunter concerns in some portions of the Chugach Mountains. One major change we noticed was that over the past 20 years (1987 vs. 2006) non-resident sheep hunter participation in 13D increased 60%, while resident participation declined by 12%. Over the same period, the percentage of rams taken by each group changed as well. The percentage of rams taken by non-residents increased by 80%, while the percentage of rams taken by residents decreased by 38%. This pattern was evident in 14A as well, indicating harvest pressure across the Chugach Mountains has changed tremendously.

With increasing pressure from a typically successful group of hunters, we realized it was time to start looking closer at the harvest rates of rams. All of 14A south and 13D west of the Richardson was surveyed in 2007, and many of the count areas were flown in 2002, 2003, and 2004. The recent harvest rates are disconcerting to say the least. We found that the number of rams harvested roughly equals that of full-curl rams observed across the entire area. Even with the number of sub full-curl age-legal rams in the field, the harvest rates in these areas are obviously too high.



by Bob Tobey, Becky Kelleyhouse, and Tony Kavalok, ADF&G

There are many reasons for declining sheep numbers across South-central Alaska, among them could be periodic deep snow, Chinook freeze/thaw events, and predation, most of which we cannot control. The one factor we can control however, is human harvest pressure. In the case of the Chugach Mountains, there was an overwhelming need to reduce mortality by whatever means possible. The recommendation to go to a permit system was made during the March 2007 Board meeting. Making this recommendation was very difficult because it meant eliminating open sheep hunting opportunity across most of the Chugach Mountains. Other options were discussed, though each came with additional concerns such as concentrating hunters in small areas or during short time periods. Experience has shown that these types of regulations just don't work.

The new drawing hunts in the Chugachs are just the first step in reviewing and evaluating sheep management strategies. While many hunters are concerned with overflow into other areas, the fact is that sheep hunting pressure is starting to decline statewide due to dramatic declines in sheep numbers in some areas, meaning that many hunters, and residents in particular, have already hung up their rifles. Reducing harvest pressure and reducing the effect of the selective full-curl harvest strategy in these areas was the right thing to do for the resource for both the short term population decline and long term genetic diversity. The Alaska Department of Fish & Game will continue to work towards a sheep management plan that benefits sheep and sheep hunters statewide.

EDITORS' NOTE: Bob Tobey, Becky Kelleyhouse, and Tony Kavalok are biologists with the Alaska Dept. of Fish & Game.

RC67

- "Any-ram" fact sheet by Wayne E. Heimer, Dall Sheep Biologist, National FNAWS Board member, and Alaska FNAWS Chapter President. Feb. 28, 2008
- \*There is a biological reason we've harvested Dall rams at full curl for the last 18 years. It's so we can safely maximize harvest and hunting opportunity. Dall sheep lamb production and ram survival to harvestable age are highest when we have older rams in the populations.
- \*Influential ADF&G biologists and leaders have chosen to ignore ADF&G's own studies demonstrating that full curl ram harvests allow the maximum sustainable harvest of Dall sheep. Instead, ADF&G has offered theoretical "genetic" reasons to reduce hunting, but have no data to back them up.
- \*In 2007, ADF&G defined a crowding problem in the Chugach Mountains, and wanted to increase the "quality of hunting" there. Consequently, ADF&G put most of the Chugach on permit. An "any-ram" bag limit to "protect genetics" came along with this proposal.
- \*ADF&G has no scientific reason for the "any-ram" bag limit. "Any-ram" is based on some ADF&G biologist's subjective feelings about Dall sheep breeding behavior and "genetics" as well as personal feelings about how sheep hunting "should be." Management should be based on scientific data. ADF&G biologists have no data justifying "any ram," just personal theoretical impressions.
- \*The ADF&G position is that full curl rams do virtually all of the breeding. This is wrong.
- \*"Any-ram" is a bighorn regulation imported from "outside" where conditions aren't like Alaska. Bighorn populations where "any-ram" works are all small, often isolated, won't ever be large, and all hunting is tightly controlled by permits. To make "any ram" biologically safe, all harvest must be controlled by permits. No open hunting can be allowed.
- \*ADF&G got the Board of Game to accept the "any ram" legal definition to "fix" a theoretical genetic problem based on a misunderstanding of Dall sheep breeding biology and genetics. There are no relevant data suggesting this problem actually exists, and wild sheep leaders like Val Geist, Ray Lee, and Marco Festa-Bianchet, (as well as Alaska's Heimer) agree such data simply don't exist. ADF&G has not acknowledged this input during the last year, and ADF&G has not presented a balanced review of the biology involved to the Board of Game. Others have tried. That's why "any-ram" is "open" at this Board of Game meeting.
- \*DNA-based data prove subdominant rams (rams less than full curl) do half the breeding in exhaustively studied bighorn populations. Hence, ADF&G's fear that small rams will dominate breeding and ruin genetics can't work. So far, ADF&G has not accepted this fact and shared it with the Board of Game.
- \*ADF&G now justifies the "any ram" harvest as an "experiment" in the Chugach, but the experiment is not yet well enough designed to produce any reliable information.
- \*Hunters are confused and distressed because ADF&G wants to reduce Dall sheep hunting opportunities based on unsupported speculation and because open hunting of "any ram" cannot occur without biological harm. This means all future hunting where "any ram" is the rule will have to be on restrictive permits.
- \*Alaska FNAWS, the Alaska Outdoor Council, the Alaska Professional Hunters Association, Sportsmen for Fish and Wildlife, the Alaska Wildlife Conservation Association, and many Advisory Committees agree "any ram" must go, and support a return to "full-curl" until there are sound data which show it will be an improvement.

R1C68

Alaska Board of Game P. O. Box 115526 Juneau, Alaska 99811-5526

February 26, 2008

To whom it may concern.

#### Does a season on full curled rams select for small-horned rams?

Horn-growth is expressed maximally under exceptionally favorable food conditions, when rams grow to their genetic maximum in body size. Then and only then is the length of the horn a function of heredity. That is, differences in horn-size then relate to heritability of horn length, and the horn length reflects the true genetic potential for horn growth by each ram.

Note: do you have Dall's rams of maximum genetic size (300 pounds and up), anywhere on your mountains?

If not, if your rams run about 180-220 lbs then the size of the ram's horns is disconnected from its genetics for horn-size. Horn size is very sensitive to environment and not very sensitive to heredity. Consequently, in rams of average body mass horn growth has little relationship to its genetics. Maximum horn size then is a function of a few good summers plus the good luck of not being killed by predators or an accident.

Moreover, rams from different home range groups of females are likely to be discrepant for horn growth, because phenotypic development of sheep differs for different female home range groups. When rams born and raised in different home range groups mix in ram groups, as they do, a ram with rapid horn growth may be inferior genetically in horn growth to ram originating in another home range group with poorer body development. An understanding of gene/environment interaction is mandatory for understanding the shaping of any organ by natural (or artificial!) selection.

The beanbag approach to genetics is flawed!

To minimize any possibility of hunters selecting against horn size, the best strategy is to harvest a fraction of the full curled rams, while keeping a tab on both, the average size of horns in rams taken by hunters as well as the average age. Both functions should be more or less constant.

Longstanding trial and error management for large antler size has shown that removing all large-antlered males leads to an exhaustion of young males and subsequently to a significant decrease in their body and horn growth. We have some evidence that this also happens to rams.

The fraction of full-curled rams can be determined accurately only when the old rams have moved to their rutting areas. Timing here is crucial as the old rams are the last to move to female ranges to breed and are the first to depart. This is not a task for quick judgment from a rapidly moving helicopter over rapidly moving sheep! Accurate methods of census are crucial.

You have in the past with the full curl rule harvested only a fraction of the legal rams – as it should be!

The fear, that taking a large fraction of full curled rams will diminish horn growth potential, is well meaning, but unfounded. It would be a different matter if rams were severely harvested at the ¾ curl stage

Sincerely,

Valerius Geist PhD., P. Biol.
Professor Emeritus of Environmental Science
The University of Calgary
<a href="mailto:kendulf@shaw.ca">kendulf@shaw.ca</a>
250-723-7436

March 1, 2008

State of Alaska Board of Game:

Dear Chairman and Board members:

My name is Tom Kirstein and my mailing address is Box 83808 Fairbanks, Alaska, 99708. I live in Fairbanks and make my living as a licensed professional Master Guide. My testimony today will address only certain proposals of the many you will consider during these meetings for regulatory change.

Proposal: #89,90. <u>I oppose these proposals.</u>

These proposals all consider changes to the Wood River Controlled Use Area. I ask you the Board of Game to consider not making any changes to the Wood River Controlled Use Area for the following reasons and considerations. This is the oldest established Controlled Use Area in Unit 20 and has proved itself to be a vital reason there has been hunt able game populations that have recovered from low densities in the past as far back to the creation of the Wood River Controlled Use Area in the early 70's. Certainly we have changed the way we hunt Sheep and Moose over the years to restrict the Horn and Antler sizes of these species before they can be harvested, which in fact helps as a very important part of the Fish and Game management tools of today. This part of the Alaska Range mountains and Tanana Flats has currently a stable or growing Moose, Caribou, Sheep, and Grizzly Bear populations.

To change boundary's or remove the Controlled Use Area all together would have a much larger killing effect on those populations then the Fish and Game Department would allow continuing for more than one or two seasons, then what My guess would be much shorter seasons or permit hunts to would we be looking at? control the numbers of hunters, especially for Moose. We already have the Caribou on permits and God only knows when those days will ever change! Today at present time there is so much hunting pressure and access into the Wood River just by aircraft alone that the game no longer has any refuge from such hunting Access to game populations by machines is not the short or long term solution to maintaining healthy game populations. Because of intensive management concerns to allow more access at this time into a very fragile area would be a sin and not Hunter's opportunity to even go in the best interest of healthy game populations. hunting to harvest the excess of game populations will be compromised. Season dates will become much shorter because of the increased access by more hunters or only a select few will enjoy the opportunity to hunt because they have drawn a permit to an area I believe that the author's of these that once provided opportunity to hunt for everyone. proposals mean well. Looking at this with tunnel vision as I see the author's have; by not considering the real impact that if the Wood River Controlled Use Area is opened up just how many hunters not just from Fairbanks but from the Anchorage and the surrounding area would bring there various machines up the Park's Highway to access the mountains passes and river drainages. The Department has steadily offered changes to have longer and longer Moose seasons in unit 20A. Longer seasons and not loosing

hunting opportunity to drawing permit hunts makes more sense. Please Board of Game members, as I have asked in past years testimonies do not change what has worked for so very many years, because if we open the flood gate to access, the game populations will suffer. Access is everything for hunters, including protecting the game we cherish!

Proposal: #26

Do Not change the legal Bull Antler size in this area because the hunting pressure today is just to great to liberalize the harvest of Bull Moose with this type of most any bull will Rather continue to allow the Department to manage the harvest of bull Moose using the current Any Bull Drawing Permits they issue. This will let all hunters to continue to enjoy the opportunity of longer Moose hunting seasons, and the Department can keep control of bull harvest levels much better do to the ever increasing hunting pressure of unit 20 for Moose.

Thank you for this opportunity to speak.

Sincerely,

Tom Kirstein

Som Kerotsen

#### Fax Transmission

Defenders of Wildlife Alaska Office 333 West 4<sup>th</sup> Avenue, Suite 302 Anchorage, Alaska 99501 (907) 276-9453 Main (907) 276-9454 Fax

Attn:

**Board of Game** 

Fax #:

907-465-6094

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907-465-4110

From:

Tom Banks

Date:

Dec. 7, 2007

Number of

pages to follow:

5

#### Comments:

March, 2008 (Interior Region) Board of Game proposal submission for <u>GMU 19D</u>, from Alaska Center for the Environment, Alaska Wildlife Alliance, and Defenders of Wildlife.

## ERRATA – Proposal 106 Transcription errors Defenders has noted, are listed below. The full text of the original proposal sent by facsimile to the BOG follows.

Bottom page 90, last sentence--it deleted part of one sentence and runs it together with part of the next.

Page 91, paragraph beginning "Of the five currently active..." the word "by" was deleted before "scientists.'

Next paragraph-- "two" is spelled "twp."

ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM, P.O. BOX 25526, JUNEAU, ALASKA 99802-5526
<b>BOARD OF FISHERIES REGULATIONS</b> ∟ Fishing Area
∟ Subsistence ⊢ Personal Use ⊢ Sport ⊢ Commercial
JOINT BOARD REGULATIONS L Advisory Committee L Regional Council L Rural
BOARD OF GAME REGULATIONS
Game Management Unit (GMU) 19D L Hunting L Trapping
Game Management Ont (GMO) 19D L Hunting L Happing
L Subsistence L Other X Predator Control
·

Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.

- 1. Alaska Administrative Code Number 5 AAC 92.125 Wolf control Implementation Plan
- 2. What is the problem you would like the Board to address?

The wolf control program in GMU 19D(East) is now in its 5<sup>th</sup> year. The initial justification for the program (that subsistence demand for moose was unmet) was flawed. Wolf control since 2003 has not produced more moose for hunters. The scientific value of the experiment has been lost. Valid monitoring and evaluation protocols are absent and costs of removing wolves are excessive. These facts indicate that the Board of Game should immediately terminate this wolf control program.

#### Justification:

In March 1995, the Board of Game (BOG) approved a wolf control program for the McGrath area (GMU 19D(East)) designed to reduce wolf numbers in that area by 80% in order to increase moose numbers to benefit hunters. This was in response to reports that the moose population had declined from several thousand in the 1970s to much lower numbers and the wolf population had increased greatly. However, the control program was not implemented at that time.

In 1999, the BOG again passed a wolf control program after local residents reported that moose numbers continued to decline. Again, the program was not implemented.

In 2000, Governor Knowles appointed a planning team to review the information and issue recommendations to the Alaska Department of Fish and Game (ADFG). The team determined that a harvest of about 150 moose per year was required to meet subsistence needs of local residents and a moose population of about 3500 was necessary to sustain the annual harvest. The planning team was told by ADFG that only about 850 moose remained in the area and a crisis existed. The team recommended that bears and wolves be reduced and the hunting season in a portion of the area be closed in order to re-build

the moose population. ADFG accepted the recommendations and the BOG adopted them in spring 2001.

In November 2001, ADFG conducted a moose census in the area that estimated a moose population of about 3,600. This indicated that previous censuses that estimated much lower numbers were in error. Plans to reduce predators were suspended because the estimate of 3,600 moose exceeded the estimate of about 3,500 needed to satisfy harvest demand.

In March 2003, a new BOG appointed by governor Murkowski revisited the issue and approved a control plan featuring aerial shooting of wolves in a portion of the area and a bear translocation effort. The BOG subsequently raised the intensive management moose population objective from 3,000-3,500 to 6,000-8,000. ADFG staff reports to the BOG indicated that U.S. Census Bureau data showed the human population in the area declined from 868 in 1990 to 564 in 2000 thereby lowering the subsistence demand for moose. The fall 2002 moose harvest estimate was 100 based only on legally taken moose voluntarily reported by successful hunters.

A 2003 lawsuit challenging the McGrath predator control program revealed problems related to accurately estimating moose harvests (and thus determining whether or not intensive management objectives were met—one of the triggers for a control program). One problem was the magnitude of the unreported legal harvest. The planning team found that prior to 2001, for every 50 moose reported another 40-50 were probably taken legally but not reported. A second problem is the illegal (obviously unreported) harvest. ADFG data from McGrath based on radioed animals indicated that 35 of 98 moose were killed legally by hunters and 12 were taken illegally. This indicates a ratio of about one illegally taken moose for every three legally taken. Thus, this information indicates that unreported legally taken moose may be as high as 100% of the reported harvest and illegally taken moose add an additional 30%.

This analysis indicates that the fall 2002 actual moose harvest likely exceeded 200 animals, much higher than previously estimated based only on the reported harvest. This, combined with the human population decline in the area, indicate that the BOG's finding that subsistence demand for moose in 2003 was not being met was likely in error. The finding that subsistence demand was unmet and intensive management harvest objectives were not achieved was the primary justification the BOG used to adopt a predator control program in 2003.

Predator control at McGrath began in fall 2003 and extends to the present time. Bears were translocated in the springs of 2004 and 2005 during moose calving season. Wolves in GMU 19D were killed each winter: 39 in 2003-04, 32 in 2004-05, 15 in 2005-06, 31 in 2006-07 (over four seasons, a total of 45 killed by aerial gunning, and 72 by combined hunting, trapping or snaring). Following the bear translocations, moose calf survival from birth to November doubled. In the bear removal area, calf:cow ratios were 51-63 calves per 100 cows—much higher than previously. This occurred primarily in a 520 square mile area termed the Experimental Micro-Management Area

(EMMA). This was only a small portion of the 8,500 square miles in GMU 19D(East). Wolves were shot in an area of about 3,200 square miles (expanded to 6,245 square miles in 2006). The moose hunting season was closed in the EMMA in order to rebuild the moose population quickly.

In November 2004, another moose census was attempted but poor snow conditions terminated it before it was completed. An ADFG memo summarizing the census data warned that extrapolating the 2004 data from the limited area censused to the entire area was not warranted. However, this was done with the resulting claim that moose numbers increased from 2001 to 2004. The invalid 2004 estimate (4,374) was compared to the intensive management population objective (6,000-8,000) to claim that the objective was unmet and therefore predator (wolf) control should continue.

No moose population censuses have been done since 2004 and the current number of moose in the entirety of GMU 19D(East) is unknown. Despite increased early calf survival following bear translocation, many of the calves "saved" from bears starved in the very severe winter of 2004-2005. ADFG estimated that moose increased 30% in the EMMA (only 6% of the entire unit) mainly as a result of moving bears and closing the hunting season. Only 45 wolves were reported taken by aerial shooters in GMU 19D(East) between 2003 and 2007, including only 7 last winter from a population estimated at 98. There is no evidence that significantly more moose are now available to hunters in the 94% of the area outside the EMMA as a result of wolf control. With the small number of wolves taken recently by aerial hunters, there is no indication that continuing wolf control will benefit hunters in the future.

Unfortunately, the main factor(s) responsible for the increases in calf:cow ratios and overall moose densities in the EMMA cannot be identified. At the May 2006 BOG meeting, BOG members and Department staff agreed that the scientific value of the McGrath predator control program was lost due to the way the program was conducted. Bear translocation, wolf reduction, and closure of the moose hunting season were all initiated at about the same time. As a result, it is not possible to determine which of these variables (or indeed, which other variables) are most important in producing observed changes in the moose population. The National Research Council Report (1997) strongly recommended that predator control programs be done so that results are clear. Unfortunately, the Committee's advice was not followed for the McGrath program.

Of the five currently active predator control programs in Alaska, the GMU 19D(East) program has the most complete data and has received the most effort by ADFG to gather field data. Unfortunately, the study plan prepared in 2001 by ADFG and peer reviewed by scientists inside and outside Alaska was shelved in 2003 when the new BOG approved the control program. Thus, the scientific protocols to adequately monitor and evaluate the results over time are not being implemented. This, in part, resulted in ADFG and BOG agreement that the scientific value of the program was lost. It also argues against continuing wolf control. If we cannot properly determine success or failure, why continue the highly controversial practice of aerial shooting?

The 19D(East) program is also the only one for which ADFG has provided cost figures. Total expenditures 2 years ago were estimated at \$1.7 million. Surely, these have now risen. If 45 wolves were taken from 2003 to 2007, the state's cost per dead wolf was nearly \$38,000, not including the costs incurred by the aerial shooters or the public relations costs to the state due to the negative image of aerial hunting. Of course, we are well aware that much of the total cost was spent on activities not related to shooting wolves but ADFG has not provided cost figures specifically for that activity.

What benefits have resulted from the cost of wolf removal? As stated above, there is no evidence that significantly more moose are available to hunters outside the EMMA as a result of reducing wolves, and there is no indication that continuing wolf control will produce more moose.

We maintain that the initial justification for wolf control at McGrath in 2003 overestimated subsistence demand for moose and underestimated subsistence harvests. Clearly, the moose population estimates prior to 2001 severely underestimated moose numbers actually present and provoked a "crisis" that never existed. Thus, the justification for wolf control was flawed at the outset.

We maintain that the wolf control conducted since 2003 has not "worked." It has failed to produce more moose for hunters. The modest gains in moose numbers in the EMMA were likely due to moving bears during moose calving season and closing the moose season. In the 94% of GMU 19D(East) outside the EMMA there is no evidence that moose have increased as a result of wolf control and no additional moose are being taken by hunters. The reported moose harvest in 2006-07 throughout all of GMU 19D was 82. This is less than the 115 reported harvest in 2002-2003 before the wolf control began.

We agree with ADFG and the BOG that the scientific value of the "experiment" at McGrath has been lost and we are unable to learn anything more there that may guide future programs. Indeed, we will likely be unable to assess whether or not wolf control worked and what factors likely limited the moose population.

We believe that it is most unfortunate that the peer reviewed study plan for McGrath was shelved before it was implemented in 2003. Now, in the absence of scientifically valid protocols to monitor and evaluate the program, one of the National Research Council's main recommendations has been breached—that the programs should be conducted so the outcomes are clear. A recent letter of concern by 172 scientists sent to Governor Palin echoed this concern. In the absence of monitoring and evaluation protocols that compromise scientific validity, and with failure to accomplish management goals (more moose for hunters), the McGrath program appears to be a total failure.

We find that the costs of wolf control at McGrath are excessive, especially since control has not produced more moose for hunters. Continuing wolf control would expend more funds that might be better used for programs that have tangible benefits.

These facts provide strong justification to terminate wolf control at McGrath immediately and we strongly urge the BOG to so.

3. What will happen if this problem is not solved?

Wolves will continue to be shot needlessly since there is no evidence that wolf control has produced more moose for hunters to date and there is no evidence that removing additional wolves will result in more moose.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

Our proposed solution is to immediately terminate the GMU 19D(East) wolf control program. This would mean revoking the implementation plan entirely, or removing wolf control provisions from it while leaving other provisions intact.

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

This proposal addresses improving and/or maintaining the quality of Alaska's natural and healthy ecosystems by recognizing the important role predators like wolves and bears play in maintaining healthy populations of ungulates. Science has proven repeatedly that long-term damage to ecosystems occurs when they are grossly manipulated for the benefit of a single species.

- 6. Solutions to difficult problems benefit some people and hurt others:
- A. Who is likely to benefit if your solution is adopted? Alaska's healthy ecosystems, in addition to all people who appreciate and respect Alaska's wildlife.
- B. Who is likely to suffer if your solution is adopted? No one.
- 7. List any other solutions you considered and why you rejected them. No other solution seems appropriate, as the number of moose reported taken by hunters has not increased after all this effort and expense.

DO NOT WRITE HERE

Submitted By: Alaska Center for the Environment, Alaska Wildlife Alliance, Defenders of Wildlife

By signature: Som Banks

Address: 333 W. 4th Ave., Suite 302, Anchorage, Alaska

Zip Code: 99501 Phone: 907-276-9453

#### Tom et al

Last night I attended the Homer AC meeting where we reviewed anterless moose (cow) hunting proposals that will be taken up by the BOG at its meeting starting Feb.29. We unanimously approved the proposal for the Homer area (15C) because there are too many moose. The number of moose that concentrate in the winter habitat areas not only exceeds the carrying capacity but is degrading the habitat even more which could, in turn, further reduce the carrying capacity. The issue is not only stunted growth of palatable shrubs (e.g. willows), but that these shrubs start developing defensive chemicals (tannic acid) that makes this vital winter food source less palatable and nutritious to moose. Since the bull-cow ratio here is way low, the only option for reducing moose populations via hunting is to have a cow season, which has the dual benefit to hunters of increasing opportunity to take moose and taking some pressure off the bull hunts.

This is a controversial issue with some AC's (Fairbanks) that hang on to the idea that hunters should only shoot bulls and/or want to eliminate predation entirely as well as those generally opposed to hunting. Nevertheless, most hunters that understand conservation support these hunts. In fact, this could be good material for Defenders and AWA to wade into since there is a lot of science and what benefits hunting opportunity here also benefits the ecology. Overbrowsed habitat is not good for other species (diversity) or moose. There is the possibility of taking a position here based on good science that supports both hunting and nonconsumptive interests.

Our discussion at the AC meeting looked at other anterless moose proposals. You guys need to look at Proposal 135 for 20D. If someone has the time, this appears to be the perfect opportunity to illustrate via a Compass article (1), letter, testimony or all the above to point out that there are risks to aggressive predator control.

Apparently because of predator control, moose populations in 20D are now at 5.6 moose/sq.mi., about 10 times most of the Interior. It says the population has reached the intensive management objective of 8-10,000. But because of that, ADF&G now wants to issue 1,000 cow permits so that it can achieve a "moose density compatible with their habitat." In other words, the population objective has been set high enough to trigger intensive management (i.e., predator control) even though that risks habitat. This certainly isn't a precautionary approach that would allow predation in order to keep populations comfortably below the winter carrying capacity. As we know, if the habitat is damaged and carrying capacity reduced, this has a longer recovery time than any predator-prey imbalance. Someone did mention that condition of the habitat isn't as important an issue in 20D because of the grain farm in the area as it is in Homer, which needs to be verified.

A guy on the Homer AC applauded this situation saying now we are getting like Sweden where the government has used intensive management (i.e., socialized hunting) to eliminate predators, create browse via extensive logging, and build numerous roads that allow easy access to hunting areas and packing out of game.

Valerie Connor

Forest Conservation Director 807 G Street Suite 100 Anchorage, AK 99501 It also seems to reflect the attitude of Governor Palin. While she says she wants good science, apparently she is referring to the science of economics and its laws of supply and demand rather than ecology and its emphasis on protecting habitat and diversity (keep all the pieces). What she doesn't seem to understand is that the issue is values, economic versus ecological, rather than science. Both sides of the argument can drag out equally valid scientific rational that supports its values.

Proposal 134 seems to offer an opportunity to point out the shortcomings applying predator control as an ongoing management strategy rather than just as an emergency measure to restore predator-prey imbalance.

# ALASKA CENTER for the ENVIRONMENT



February 29, 2008

Dear Chairman Judkins.

The following comments are being submitted on behalf of The Alaska Center tor the Environment. ACE is a non-profit environmental education and advocacy organization, whose mission is to enhance Alaskans' quality of life by protecting wild places, fostering sustainable communities and promoting recreational apportunities. ACE advocates for sustainable policy on behalf of nearly 7000 Alaskan members.

Today we wish to comment on Proposal A (amended proposal 59) which has to do with the size and style of traps allowed in Chugach State Park and proposed setbacks from trailheads and trails. Thank you for this opportunity to comment on an issue of great importance to many people.

As I am sure you are aware, the Board of Game's decision to open Chugach State Park to wolverine trapping has resulted in a huge public outcry. There are several reasons this decision doesn't sit well with the public; all of which are credible and significant in and of themselves, but when added together leads to an unacceptable situation. This season alone five dogs were reported to have been trapped in Unit 14C, one fatally by a Conibear trap in Chugach State Park within feet from an established trail. The proximity of Chugach State Park to Alaska's largest urban center makes it unsuited for certain trapping activities, including all of the types of traps discussed in Proposal A (amended proposal 59).

In addition, ACE supports Alaska State Park's proposed regulations to prohibit trapping (11 AAC 20.011) within a ½ mile radius around developed facilities or trailheads and along portions of the Seward Highway, within 200 yard-wide corridors along designated trails, and within the Bird Creek Regional Park. ACE supports these proposed changes because they will help protect the large number of hikers, skiers, and dog owners who regularly visit the park and far outnumber the trappers who utilize the area.

Alaska Center for the Environment asks that you approve Proposal A with the amendments suggested above regarding setbacks from trailheads and trails. On behalf of our members and staff, I thank you and the Board of Game for your consideration and support.

/S/ Valeric Connor (46)
Valerie Connor
Alaska Certer fortheten vironment

Forest Conservation Director

807 G Street Suite 100

Anchorage, AK YÝ501

Dear Mr. Tom Banks & the Alaska Board of Game,

traps allowed in Unugach State Park. In order to have a sate park for children, dogs and everyone else, it is imperative that traps near trails been eliminated, especially the large ones almed at wolverines. It Alaskans want a civil society it is crucial that health and satety of young people and pets be paramount.

Areas that are used for niking and other recreation, should be governed by policies that keep traps and people and their pets far apart.

I nank you for your work on this matter,

William Watson

8111 Sundi Drive

Anchorage AK 99502

watson@alaska.net

For You replied on Avancation 7:24 7:11

Attachments can contain viruses that may harm your computer. Attachments may not display

COLLECT

**=** = -----

From:

John Wenger | gowild@ak.net|

**Sent:** Fri 2/29/2008 6:09 PM

To:

**TBanks** 

Cc:

Subject:

Proposal 59

Attacnments: \_\_ image001.jpg(/KB)

Hello Tom Banks, I am writing you after receiving into from the Alaska Center for the Environment (ACE) regarding the conflict of trapping in Chugach State Park. I am a former wildlife biologist with ADF&G and natural resources university instructor. I am well familiar with these types of situations. My basic position is quite clear- the current situation of setting traps near public trails and other popularly used areas should not be allowed. This issue should not require testimony from wildlife management specialists...it is common sense. I have seen what a steel trap can do to a pet especially when the animal is left struggling for some time. The animal may not be killed but may be permanently injured psychologically. Even though dogs should be restrained on public-use trails, it still only makes common sense not to place traps within close distance of high-use areas. As a last statement, after being in Alaska for 40 years and witnessing too much emphasis on the narvesting of wildlife species and too little attention devoted to other Alaskan's priorities, it is time that we start to manage our State Parks as, exactly what they are, parks...for all the enjoy. John Wenger gowild@ak.net

#### Frou replied on 2/29/2000 6 -

#### Hanks

From:

Barbara Norris [norris@ak.net]

To:

**TBanks** 

Cc:

Subject:

Proposal 59

Attachments:

Dear Board of Game,

I support Proposal 59 to keep trapping away from people and pets in the Chugach. My personal view is that trapping should be banned throughout the park. The Chugach State Park is a major recreational area for Anchorage residents. Particularly above tree line, hikers and their pets do not stay on trails, but wander all over the mountains. A small number of trappers seeking minimal profits should not create an extreme risk of harm to the many, many people and pets who roam the Chugach State Park. No other group is permitted to create such risks to the public for their own meager personal financial gain. There is plenty of employment in this region and trapping in the Chugach is not a financial necessity for anyone.

Barbara A. Norris Law Offices of Barbara A. Norris 645 W. Third Ave. Anchorage, AK 99501 Phone: 907-279-6621

FAX:

888-592-9982

norris@ak.net

Sent: Fri 2/29/2008 7:33 PM

**Sent:** Fri 2/29/2008 4:09 PM

### Banks

From:

Jonathan Sewall [jwsewall@gci.net]

TBanks

To: Cc:

Subject:

trapping regs

**Attachments:** 

Tom,

I am a long time hunter and fisherman, who also enjoys non-consumptive uses of our forests. I am concerned for the safety of my dog, especially in winter, do to the few trappers who set too close to multi-use trails. I do keep my pet close to the trails, once we leave the trailhead area, but a dog needs the chance to run a bit. In everyone's best interest, there needs to be more buffer between public trails and trap sets. Please pass my concerns to the Board of Game.

By the way, I am a thirty-three year resident of Seward and have always held a hunting/fishing/trapping licence.

Thank you,

Jonathan Sewall PO box 1184

Seward, Ak 99664-1184

jwsewall@gci.net



# Proposal 7

5 AAC 99.025. Customary and traditional uses of game populations. Unit 18 Moose

Prepared for Alaska Board of Game March 2008

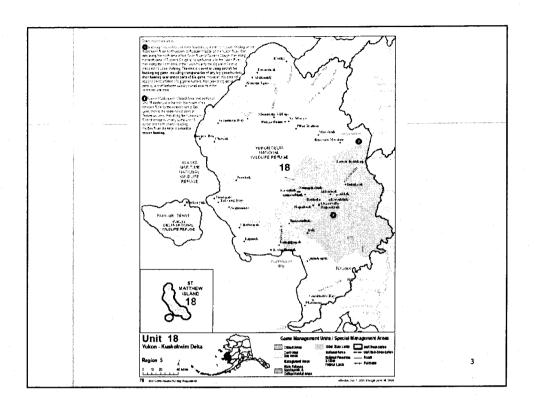
RC 71

# Proposal 7

This proposal would revise the Amount Necessary for Subsistence finding for moose in Unit 18.

Department Recommendation: No recommendation

BOG March 2008, RC 71



### State Subsistence Procedures

### Board Findings on Unit 18 Moose

- Is there Customary and Traditional Use of Unit 18 Moose?
  - Yes, positive finding in 1987; reconfirmed 1992.
- Is there a "Harvestable Surplus" of Unit 18 Moose?
  - Yes, 600 750 in Unit 18 Yukon drainage portion based on biological information.
  - No harvestable surplus in other areas of Unit 18 based on biological information.

BOG March 2008, RC 71

## **State Subsistence Procedures**

- What is the Amount reasonably Necessary for Subsistence (ANS) uses?
  - 80 to 100 moose, Unit 18
    Board determination in 1992.
    Includes 20 to 30 moose in winter.
- Does the harvestable surplus allow for all or only some uses?
  - This is a Board determination.

BOG March 2008, RC 71

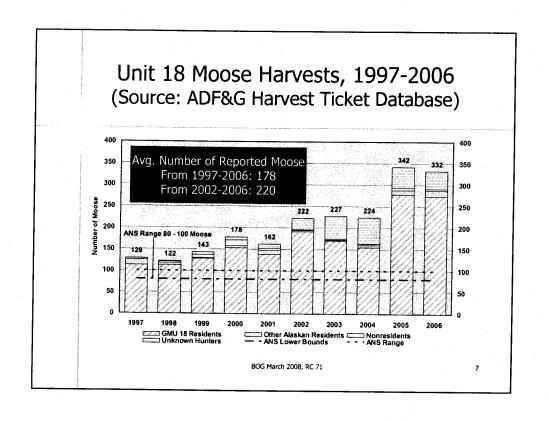
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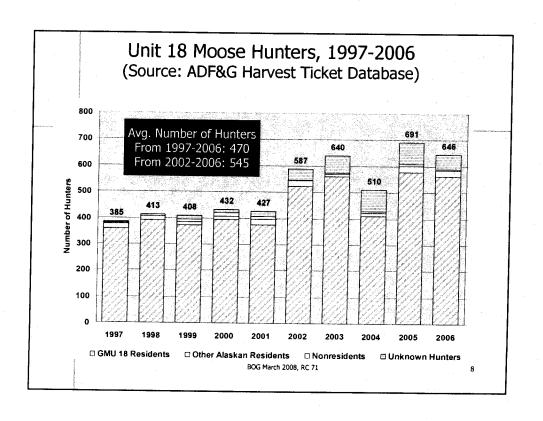
## Harvest and Use Patterns

#### Information includes:

- Estimates of number of moose harvested by Unit 18 residents and Other Alaskans, 1997-2006.
- 2) Estimates of number of moose hunters in Unit 18, 1997-2006.
- 3) Unit 18 community harvests of moose from department subsistence research.

BOG March 2008, RC 71





# Estimated Number of Moose Harvested by Unit 18 Communities

### Lower Yukon Area:

	Percent HHs surveyed	1980	1985
Nunam Iqua	30%	7	-
Alakanuk	23%	34	
Emmonak	18%	25	-
Kotlik	25%	16	-
Mountain Village	17%	54	-
Russian Mission	100%		33

Source: ADF&G, Division of Subsistence, Community Household Survey Research.

BOG March 2008, RC 71

# Estimated Number of Moose Harvested by Unit 18 Communities

#### Lower Kuskokwim Area:

	Percent HHs surveyed	1982	1983	1986	1998	2003	2004
Quinhagak	12%	33	-	-	-	-	-
Nunapitchuk	24%	-	12	-	-	-	
Kwethluk	32%	-	-	33	-	-	-
Akiachak	69%	-	-	-	106	-	_
Lower Kalskag	64%	-	-	-	-	13	1
Upper Kalskag	77%	-	-	-	-	2	3

BOG March 2008, RC 71 Source: ADF&G, Division of Subsistence, Community Household Survey Research.

# Proposal 7

### Summary:

This proposal would revise the Amount Necessary for Subsistence (ANS) finding for moose in Unit 18.

Department Recommendation: No recommendation

BOG March 2008, RC 71

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# Questions?



Thank you!

BOG March 2008, RC 71

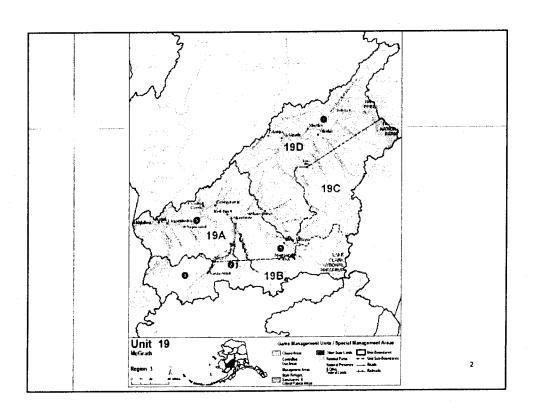


### Review of Unit 19 Moose Amount Reasonably Necessary for Subsistence Uses

Prepared for Board of Game March 2008

Alaska Dept. of Fish and Game Division of Subsistence **RC 72** 

BOG March 2008, RC 72



### State Subsistence Procedures

Board Findings on Unit 19 Moose

- Is there Customary and Traditional Use of Unit 19 (A-D) Moose?
  - Yes, positive finding in 1987; reconfirmed 1992.
- Is there a "Harvestable Surplus" of Unit 19?
  - Yes, except closed area, based on biological data:
    - 19(A) Tier II area 40-115
    - 19(A) LVMA 1-5
    - 19(A) remainder 0
    - 19(B) 70-150
    - 19(C) 140-220
    - 19(D) 180-270

BOG March 2008, RC 72

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### State Subsistence Procedures

Board Findings on Unit 19 Moose

- What is the Amount reasonably Necessary for Subsistence?
  - Unit 19 within LVMA: 30-40 moose;
  - Unit 19 outside of LVMA: 400-700, including 175-225 in Unit 19A; 20-24 in Unit 19B
     Board determinations in 2002 and 2006.
- Does the harvestable surplus allow for all or only some uses?
  - This is a Board determination

BOG March 2008, RC 72

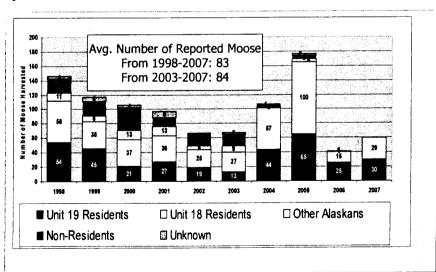
### Harvest and Use Patterns

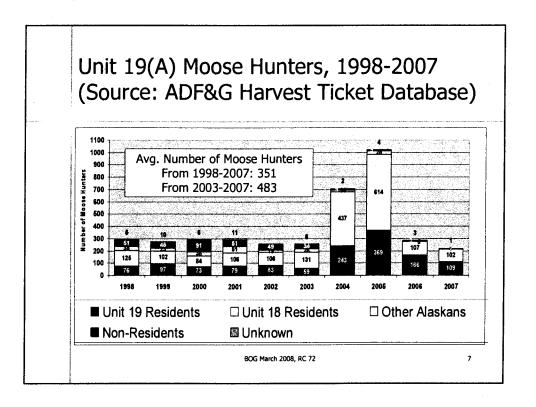
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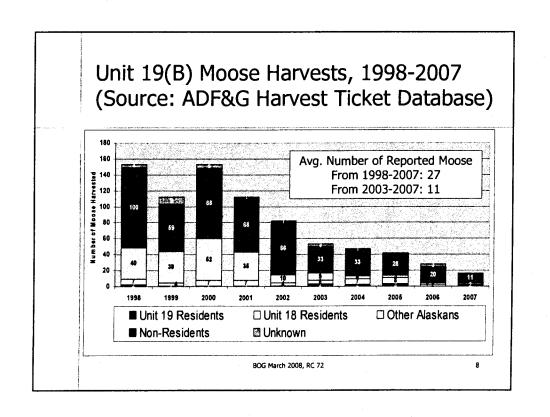
- 1) Estimates of number of moose harvested by Units 19 and 18 residents and Other Alaskans, 1998-2007 (harvest tickets),
- 2) Estimates of number of moose hunters in Unit 19 subunits, 1998-2007 (harvest tickets),
- 3) Unit 19(A) community harvests of moose from department subsistence research (household surveys).

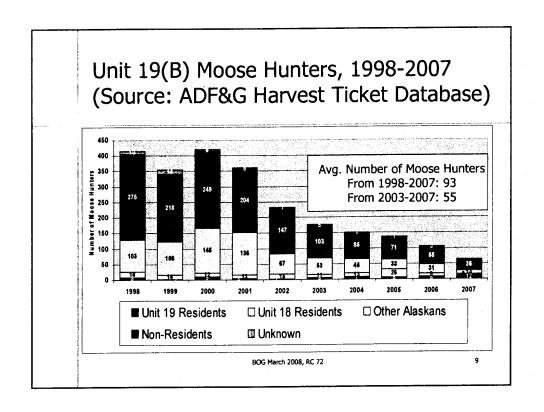
BOG March 2008, RC 72

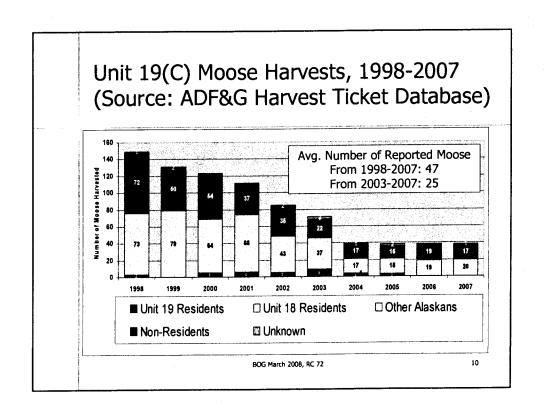
# Unit 19(A) Moose Harvests, 1998-2007 (Source: ADF&G Harvest Ticket Database)

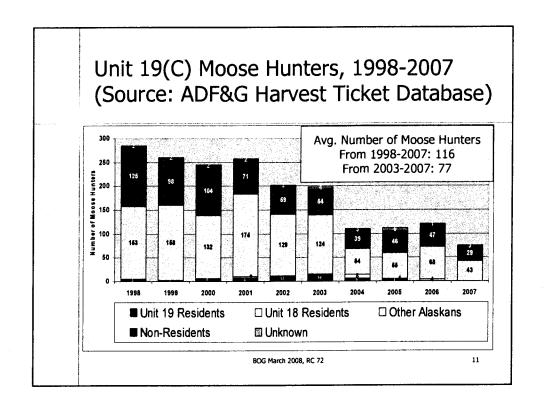


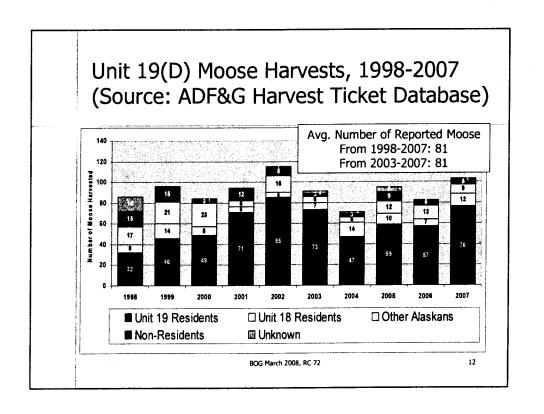


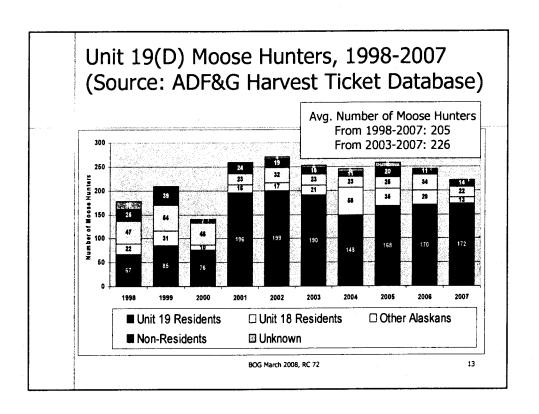












# Number of Moose Harvested by 19(A) Communities, 2003-2006

	2003-04	2004-05	2005-06	Sample
All communities	107	69	88	63%
Aniak	24	39	46	61%
Chuathbaluk	5	1	4	60%
Crooked Creek	9	4	11	67%
Lower Kalskag	30	12	3	55%
Red Devil	2	0	0	77%
Sleetmute	11	3	0	65%
Stony River	4	0	11	48%
Upper Kalskag	21	9	12	68%

BOG March 2008, RC 72

# Subunit Moose Harvest by Unit 19(A) Communities, 2003-2006

	Unit 18	Unit 19(A)	Unit 19(B)	Unit 19(C)	Unit 19(D)	Unknown
2003-04	14	64	3	0	2	23
2004-05	4	51	0	0	2	3
2005-06	0	62	1	0	6	6

Source: ADF&G, household surveys, CSIS

BOG March 2008, RC 72

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Questions?



Thank you!

BOG March 2008, RC 72

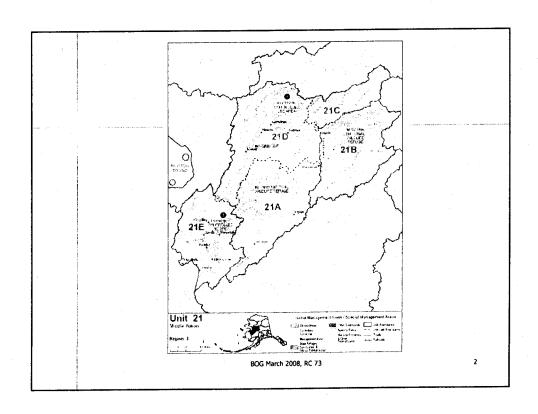


# Review of Unit 21 Moose Amount Reasonably Necessary for Subsistence Uses

Prepared for Board of Game March 2008

Alaska Dept. of Fish and Game Division of Subsistence RC 73

BOG March 2008, RC 73



### State Subsistence Procedures

Board Findings on Unit 21 Moose

- Is there Customary and Traditional Use of Unit 21 Moose?
  - Yes, positive finding in 1988; reconfirmed 1992.
- Is there a "Harvestable Surplus" in Unit 21 and subunits?
  - Yes, based on biological information.
    - GMU 21 1,129-1,607 moose
      - 21(A) 172-260 moose
      - 21(B) 200
      - 21(C) 45
      - 21(D) 580
      - 21(E) 280-360

BOG March 2008, RC 73

# State Subsistence Procedures Board Findings on Unit 21 Moose

- What is the Amount reasonably Necessary for Subsistence?
  - 600 800 for the entire unit, Board determination in 2000, reconfirmed in 2002.
- Does the harvestable surplus allow for all or only some uses?
  - This is a Board determination.

BOG March 2008, RC 73

### Harvest and Use Patterns

The following slides depict subunit patterns of use of Unit 21 moose by local residents and other Alaskans based on ADF&G harvest ticket records and household surveys.

#### Information includes:

- 1. Unit 21 ANS finding by BOG in 2000 and 2002,
- 2. Number of moose harvested (harvest tickets),
- 3. Number of hunters (harvest tickets),
- 4. Number of moose harvested by Unit 21 communities (household surveys).

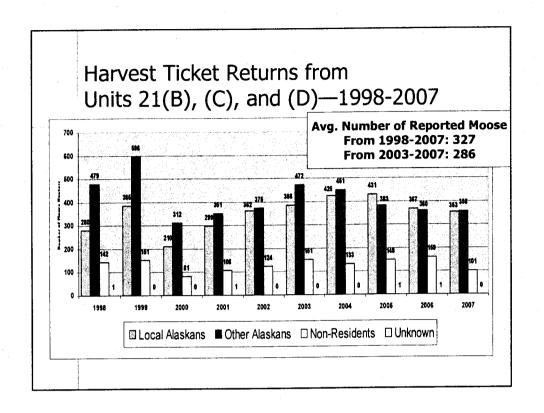
BOG March 2008, RC 73

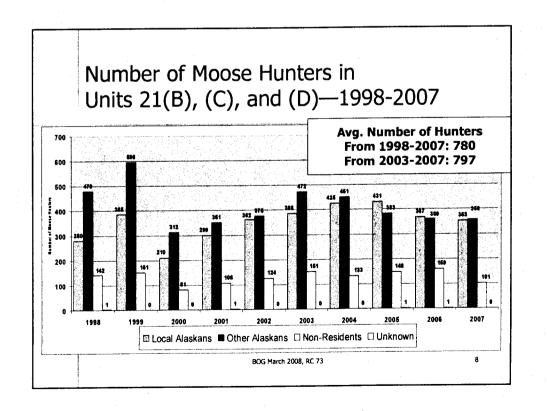
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# Amounts Necessary for Subsistence (ANS)

#### 2000 Board Findings for Unit 21 Moose:

Unit Subunit	1998 Population	Hvst by Local Res. 1996-1999 avg	Hvst by Other Alaskans	Total Hvst. By Alaskans
21(A)	O (no communities)	33 (28-35) Kaltag/HolyCross/Shag./Tanana	66 (57-78)	99 (92-113)
21(B)	<b>521</b> Ruby (204), Tanana (317)	27 (19-35) Ruby/Tanana	25 (14-46)	52 (35-81)
21(C)	O (no communities)	2 (0-5) Ruby	11 (8-14)	13 (8-15)
21(D)	1,277 Kaltag (250), Nulato (353), Koyukuk (130), Galena (544)	250 (236-275) Galena, Kaltag, Nulato, Koyukuk, Ruby, Tanana, Husila	128 (99-154) (excl. RM830 general Hunt Permits)	378 (339 – 429)
21(E)	724 Grayling (195), Anvik (100), Shageluk (152), Holy Cross (277)	226 G.A.S.H.	142 (130-157)	368 (356-383)
Total	2,522	538 BOG March 2008, RC	372	910

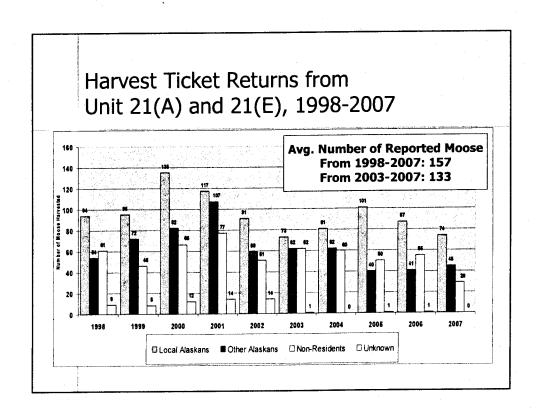


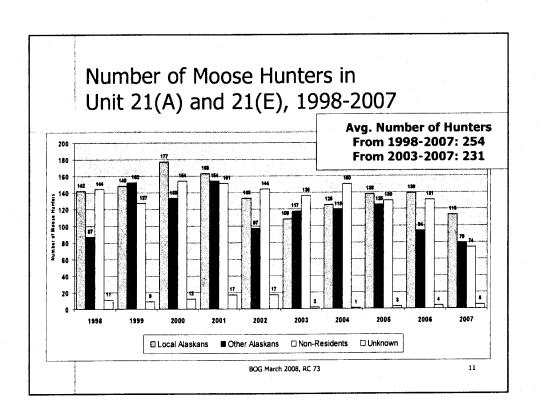


# Number of Moose Harvested in Unit 21 by Local Residents , 1997-2003

to a second control of the second control of	97-98	98-99	99-00	01-02	02-03
21(B)	27	35	47	7	22
21(C)	0	0	0	0	2
21(D)	248	209	222	226	144
21(A)	8	1	2	1	0
21(E)	0	1	0	1	0

BOG March 2008, RC 73





# Number of Moose Harvested by Communities located in 21(E)—2002-05

	Percent HHs surveyed	2002-03	2003-04	2004-05
Grayling	99%	33	36	28
Anvik	86%	21	16	24
Shageluk	93%	31	28	16
Holy Cross	91%	48	38	26
Total	92%	133	118	94

Source: ADF&G, Division of Subsistence, CSIS

BOG March 2008, RC 73

# Number of Moose Harvested by 21(E) Communities by Unit where harvested— 2002-05

Year/Unit	2002-03	2003-04	2004-05
18	1	0	0
21 (E)	132	116	91
21 (A)	0	0	2
21(D)	0	2	1

Source: ADF&G, Division of Subsistence, CSIS

BOG March 2008, RC 73

13

Questions?



Thank you!

BOG March 2008, RC 73

# Proposal 73

# 5 AAC 85.045(a)(24). Hunting seasons and bag limits for Unit 26(C) moose

Prepared for Alaska Board of Game March 2008

**RC 74** 

# Proposal 73

Opens a moose hunting season in Unit 26(C):

Residents:

Registration permit, 1 bull, Sept. 15-April 15 season

Non-residents:

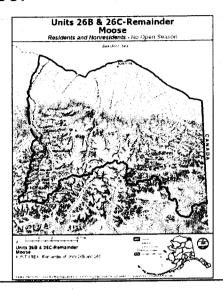
Registration permit, 1 bull with 50" or 4 or more brow times; Sept. 5-Nov. 30 season.

Department Recommendation:

Do Not Adopt

BOG March 2008, Proposal 73

# Current State Regulations in Unit 26(C), 2005-2007



3

### State Subsistence Procedures

Board Findings on Unit 26 Moose

- Is there Customary and Traditional Use of Unit 26 Moose?
  - Yes, positive finding in 1987; reconfirmed 1992.
- Is there a "Harvestable Surplus" of Unit 26(C) Moose?
  - Yes, 1-2 bull moose along the coastal plain based on biological information.

BOG March 2008, Proposal 73

### State Subsistence Procedures

Board Findings on Unit 26 Moose

- What is the Amount reasonably Necessary for Subsistence?
  - 60 80 moose for all of Unit 26, Board determination in 1992.
  - 21 48, including 15 30 in Unit 26(A),
    Board determination in November 2007.
- Does the harvestable surplus allow for all or only some uses?
  - This is a Board determination

BOG March 2008, Proposal 73

5

### Harvest and Use Patterns

The following slides depict patterns of moose use by Unit 26(C) residents and Other Alaskans based on ADF&G harvest ticket records.

### Information includes:

- 1. Summary of 1992 Subsistence Consistency Review information on harvest and use patterns,
- 2. Estimates of number of moose harvested,
- 3. Estimates of number of hunters.

BOG March 2008, Proposal 73

### Harvest and Use Patterns

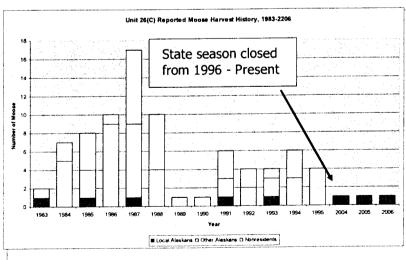
### 1992 Board Findings on Unit 26 Moose:

- In 1992, the Board considered reported subunit harvest levels on Unit 26 moose populations during the preceding decade, including:
  - 37 65 moose from Unit 26(A)
  - 15 33 moose from Unit 26(B)
  - 1 16 moose from Unit 26(C).
- 1970s-1980s moose population was stable at approximately 1,400 − 1,800 animals.
- Recent population estimate of Unit 26(C) moose along the Coastal Plain is 47-52 moose.
- No recent population survey data is available south of the Coastal Plain (Upper Kongakut and Firth/Mancha drainages).

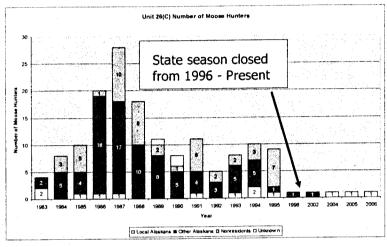
BOG March 2008, Proposal 73

-

# Harvest Ticket Returns from Unit 26(C), 1983-2006



# Number of Moose Hunters in Unit 26(C), 1983-2006



BOG March 2008, Proposal 73

9

#### Proposal 73

#### Summary:

This proposal:

Opens a moose hunting season in Unit 26(C):

#### Residents:

Registration permit, 1 bull, Sept. 15-April 15 season

#### Non-residents:

Registration permit, 1 bull with 50" or 4 or more brow times; Sept. 5-Nov. 30 season.

Department Recommendation: Do Not Adopt

BOG March 2008, Proposal 73

10

Questions?



Thank you!

BOG March 2008, Proposal 73

11

03/01/2007 15:19 9072352340

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### HOMER FISH & GAME ADVISORY COMMITTEE

FEB 2 9 2008

February 26, 2008 Meeting began 6:10

BOARDS ANCHORAGE

Members Present: Mary Peters, Trina B. Fellows, Michael Craig, Lee Martin, Cliff Calkins, George Matz, Thomas Hagberg, Skip Avril, Gus Van Dyke, James Meeses, Joey Allred jr., Matt North, Pete Wedin.

Members Absent Excused: Richard Baltzer, Dave Lyon, Tom Young, Frank Mullen.

Homer F&G Biologist present: Thomas Mcdonough, Charley Tollbridge, and Nicky

BOG Proposal comments. Intento Region

Proposal 49, 50, 59 0 Favor 13 Oppose 0 Abstain

Discussion: These proposals would take management of resource away from biologist.

Privatize a resource.

Take an allocated resource and allocating it further.

0 Favor 13 Oppose OAbstain

Discussion: A March hunt? Cows are undernourished and carrying a calf. Privatize a resource. Not needed

Proposal 127 13 Favor 0 Oppose 0 Abstain

Discussion: This cow hunt proposal is needed to keep authorization on the books.

Proposal 128 12 Favor 1 Oppose 0 Abstain

Discussion: Thomas McDonough discussed this proposal. Most members of the advisory committee agreed this hunt should continue - One opposed does not think a cow hunt is necessary or good management.

Proposal 102, 106, 113 1 Favor 11 Oppose 1 Abstain

Discussion: Manipulating species long term is damaging. Don't know enough about the predator control program to comment.

King: Tanner Stadewide

Proposal 359

Charley Tollbridge and Nicky Szarzi gave their ideas on a Tanner crab fishery for Subsistence, Sports, Personal Use in Kachemak Bay, Cook Inlet.

Discussion: What parts are you changing? Why can't the season be opened later in the year? July is to early. Amend to September 15, Crab is empty in July. Waste of resource.

03/81/2007 16:19 9072352340

LAZER PRINT

PAGE 03

One committee member is worried a below freezing winter would kill crab if pots are pulled.

Amend proposal to read September 15 to March 31. 11 Favor 0 Oppose 2 Abstain

Last trawl survey would be completed-new numbers would be available. 12 Favor 1 Oppose 0 Abstain as amended.

The use of trawl gear to collect data was also discussed. It is harmful to the bottom critters. Does not encompass a large enough area. Does not give a valid count.

RC 76

ATTN: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

29 February 2008

#### Alaska Board of Game Members:

I strongly support proposal number 86 to create a state wildlife refuge in the area of the Tangle Lakes. This is a bountiful and beautiful area, one used for hunting for many centuries by humans, dating back to early inhabitants of this region. It is an important portion of the range of the caribou who frequent this and nearby regions. My family and I have enjoyed this area for nearly 30 years. We have utilized the Tangle Lakes and surrounding locales for hunting, wildlife viewing, photography, and fishing, as well as for canoeing and berry picking.

The area around the Tangle Lakes continues to be an important resource to the inhabitants of this area, as it has been, judging by the archeological record, for millennia. It is highly deserving of the designation of Tangle Lakes State Wildlife Refuge.

Thank you for your attention in this matter.

David T. Wellman HC60 Box 227

Copper Center, AK 99573

(907) 822-3418

New Stuyahok Traditional Council P.O. Box 49 New Stuyahok, Alaska 99636 (907) 693-3173 fax (907) 693-3179

BOARD OF GAME

February 25, 2008

98-5AAC 92.125

Proposal 98

New Stuyahok Traditional Council supports the Nushagak Advisory Committee's favor to approve this Proposal. The subsistence users residents of New Stuyahok has heard reports of Nushagak Advisory Committee and again what happening to Unit 9. New Stuyahok Traditional Equacil feels that the Nushagak Advisory Committee's support is the right way to go to observe the population of Caribou head in Unit 17b and 17c, before caribou herd drastically declines.

Sincerely:

Marke andrew of for Wassillie Wonhola-President

N.S.T.C.

Cc:file

RC 78

New Stuyahok Traditional Council P.O. Box 49 New Stuyahok, Alaska 99636 (907) 693-3173 fax (907) 693-3179

BOARD OF GAME

February 25, 2008

New Stuyahok Traditional Council supports the Nushagak Advisory Committee's favor to support Proposal 97-5 AAC 92.125. The current Regulation in place is not working, has no improvement to the Population of the caribon herd. The president's of the unit 9b, 9c, 9e do really need our help to support this predation control.

Board of same, the position of Nushagak Advisory Committee stands before your vote, New Stuyahok Traditional Council supports this Proposal and feels that we really need to try something different Thank you and if you need to don't hesitate to call the number listed above. New Stuyahok Traditional Council fully supports the Nushagak Advisory Committee.

Sincerely,

Moke acher J. For Wassillie Wonbola

President

cc-file

Board of Game Region III Meeting	Feb 29 March 10, 2008	RC 79
Public Testimony Sign Up Name	Representing	Subject / Related RC. PC or AC
1. Wayne Walters	Self	Cow Hunt GMU 20A
2.Phil Schad	Self	Moose Regs 20A
3.Sandra Sedwarft	Self	Predator control issues
4.Larry Bell	USFS	Prop 97; Predator Control GMU 9
5.Harlan Sweetsir	Self	Oppose Prop 94
6.Ruth McHenry	Copper Country Alliance	Prop 86
7.Randy Zarnke	AK Trappers Assn	Trapping proposals
8. John Basile	Middle Nenana AC	AC position on proposals
9.Teekona Sweetesir	Self	Prop 94
10. Virgil Umphenour	Self	Proposals 85
11. Ed Sarten	Self, Ruby AC	Prop 94, Prop 50
12. Larry Williams	Yukon Flats AC	AC position on proposals
13. PJ Simon	Self	No fly zone in GMU 24
14. Benedict Jones	Middle Yukon AC	AC position on proposals
15. Elenor Yatlin	Koyukuk River AC	AC position on proposals
16. Timothy Andrew	AVCP	Proposals 4-7
17. Mike Brase	Self	Prop 92
18. Tom Lamal	Self	Prop 85
19. Nate Turner	Self	Props 34, 55, 91
20. Auston Hopkins	Self	Prop 42, RC 49
21. Gloria Stickwan	Self	Props 25,28,36,88,130,
22. Audun Endestad	Self	Props 89, 90
23. Caleb Herstroeter	Self	Prop 20
24. Tom Kriska	Self	Prop 94, Predator control
25. Percy Houts	Self	Prop 43
26. Tony Russ	Mat Valley Ac	AC position on proposals
27. Abe Horschel	Self	Public Use Hunting
28. Herman Evan	Village of Kwethluk	Prop 12, hunting season for moose
29. Harry Reynolds	Self	IM Bear Regulation Proposals
30. Emma Lee Grennan	Interior AK Airboat Assn	Props 43,91,92

Board of Game Region III Meetin	g Feb 29 March 10, 2008	RC 79
Public Testimony Sign Up Name	Representing	Subject / Related RC. PC or AC
31. Al Barrette	Self	Props 17,83
32. Hugh Les Krank	Self	Pred contol, moose, caribou hunting seasons
33. Jack Reakoff	WIRAC,Self	RC57, 58, Props 95,96
34. Lee Olsen	Self	Props 26,43,91,92
35. Steve Flory	Self	Any Ram
36. Rod Arno	AK Outdoor Counc, Self	Prop 112,PC 65
37. Mike Tinker	Fairbanks AC	AC position on proposals
38. Bud Burris	Self	Intensive Management
39. Mike Smith	Tanana Chiefs Conference	Proposals
40. Bonne' Wolstad	Self	20A Zone 5
41. Doug Carney	Self, Stony Holitna AC	AC position on proposals, and self
42. Bob Aloysius	Self, Central Kusko AC	AC position on proposals, and self
43. Greg Roczicka	Self, Lower Kusko AC	AC position on proposals, and self
44. Ted Hamilton	Lower Yukon AC	proposal 7
45. David O. David	Central Bering Sea AC	Props 4,5,6,7,
46. Ray Heuer	Self	Props 91, 92
47. Mark Richards	Self, AK Backcountry Hun	ters & Anglers Access, IM, issues
48. Tom Huntington	Self	Props 75,78,94,21,22
49. Jerry Sanders	Self	20A antlerless hunt
50. Fred Wolstad	Self	20A antlerless hunt
51. John Frost	Self, AK Bow Hunters	Sheep, Dalton Hwy Issues
52. Linda Tyone	Ahtna	Prop 86, 20A hunts
53. Valerie Baxter	Self	Props 130, 131
54. Jamie Olthoff	Self	Prop 43
55. Kay Hoch	Self	Prop 43
56. Jim Stronk	Self	20A 20B Antlerless hunt
57. Ernie Crabb	Self	Game Reg Complexity
58. Robert Caywood	Self	Prop 90,27,44
59. John Giuchici	Self, Salcha River Prop Ov	wners 85,109,130,131
60. Dick Ritchie	Self	Prop 85,130,131

Board of Game Region III Meeting	Feb 29 March 10, 2008	RC 79
Public Testimony Sign Up Name	Representing	Subject / Related RC. PC or AC
61. Debra Curnow	Self	Props 89 90
62. Loren Hite	Self	Prop 43
63. Harvey Drake	Self	Prop 36, 43
64. Robert Fithian	Self, AK Professional Hunte	ers Proposal comments
65. Pete Buist	Self	Any ram
66. Hans Nicholson	Nushagak AC	Props 97 98
67. Henry Tiffany	Self	Prop 70, 85
68. Tim Kirstein	Self	Unit 20
69. Harold Sipes	Self	20A Anterless hunt
70. Roggie Hunter	Self	Prop 82,83,89 113
71. Bart Colledge	Self	Bow hunting
72. Grady Brown	Self	Bow hunting
73. Ray Lee	FNAWS	Prop 158
74. Warren Olson	Self	Prop 158
75. Karen Gordon	Self	Prop 158
76. Larry Dalrymple	Self	Props 85, 89,90
77. Mary Bishop	Self	Comments on proposals
78. Tom Banks	Defenders of Wildl, Self	Wolverines & Predator Control
79. Frank Entsminger	Self	Personal Testimony
80. Ray Collins	McGrath AC, Self	AC position on proposals, and self
81. Don Quarberg	Delta AC, Self	AC position on proposals, and self
82. Jim Tilly	Lake Illiamna AC, Self	AC position on proposals, and self
83. Aaron Bloomquist	Self, Anchorage AC	AC position on proposals, and self
84. Jay Jensen/Ken Chase	GASH AC	AC position on proposals
85. Frank Entsminger	Upper Tanana/40mile AC	AC position on proposals
86. Ron Silas	Minto-Nenana AC	AC position on proposals

#### **Anchorage ADF&G Advisory Committee**

#### Meeting Minutes February 26, 2008

#### **Comments for Interior Region Board of Game proposals**

- ▶ #1 To provide registered hunt in Unit 12 for Caribou. Department Fish & Game recommendation is do not adopt...herd strength is still low.
  Failed vote: Yea 0. Nav 8
- ▶ #3 To close black bear hunting around wolverine creek...Vote: Yea 7, Nay 1 Approved
- ▶ #16 To lengthen wolverine season for Unit 19...one wolverine; add the extra time to the start of the season to avoid denning .Aug 10<sup>th</sup> – March 31. Vote: Yea 8, Nay 0 Approved as amended
- ▶ #17 To modify season for trapping Lynx in Unit 20

Vote: Yea 8, Nay 0 Approved

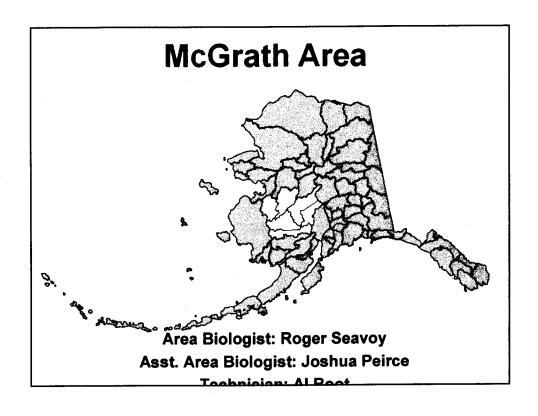
- ▶ #20 To modify regulations allowing baiting of Grizzly Bears in Unit 20B Vote: Yea 4, Nay 4...Split vote...issue failed
- ▶ #22 Increase Macomb heard harvest. Support 8-0-0
- ▶ #27 To terminate antierless moose hunt in Units 20A and 20B...Dept F&G is opposed on biological standpoint...area will support a lot of moose.

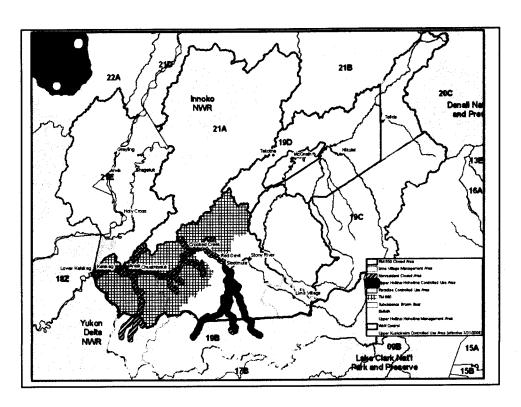
  Vote: Yea 0, Nay 7, abstain Failed
- #28 Not addressed:..same problem as 27
- ▶ #36...See 27 & 28
- ▶ #38 To establish another controlled use area in Unit 20A preventing use of ATV's for off road use....Allocation issue pertaining to user groups. Vote: yea 0. Nay 8 Failed
- ► #39 To allow archery hunting in all of area 20B from September 1-30. Vote: Yea 8, Nay 0 Approved
- ▶ #40 Allow sealing of brown bear from 20E in Tok, Delta, or Fairbanks. Support 8-0-0
- ▶ #42 To allow the taking of grizzly bears over bait in Unit 20B...concern of conflicts between human and bears. Vote: ...Take no action
- ▶ #53 To have no closed season on beaver in Unit 21A...Dept recommends amend and adopt...Vote: Take no action...See #82
- ▶ #54 To close Unit 21A to taking of moose and caribou by non-residents Vote: Yea 0, Nay 8 Failed
- ▶ #55 Way too Complicated 0-8-0
- ▶ #61 Support, bow hunting for wolves has a very low success rate, this would provide opportunity for incidental take. 8-0-0
- ▶ #64 Oppose 0-8-0
- ▶ #63 To change moose hunt season dates ... Early season is too warm.. Dept F&G recommends amend and adopt to September 1 September 25.

Vote: Yea 8, Nay 0 Approved

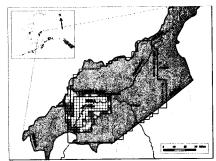
- ► #68 To allow taking of black and grizzly bear in Unit 25D by traditional methods. Vote: Yea 4, Nay 4 Split vote...failed
- ▶ #69 Support 8-0-0
- ▶ #72 support 8-0-0
- ► #71 support 8-0-0
- ▶ #73 Allow a limited Moose hunt in the Eastern Brooks Range 8-0-0
- ▶ #76 To separate Dall sheep drawing permit hunts into two time periods to better manage number of hunters..Vote: Yea 8, Nay 0 Approved
- ▶ #77 To allow 20% of nonresident tags in Units TMA to 2<sup>nd</sup> degree kindred hunters....Vote: Yea 4, Nay 4 Failed
- ▶ #82 To allow taking of beavers using firearms...amend and adopt support as amended by ADF&G 8-0-0
- ▶ #83 Support this a reasonable alternative to requiring bear bait permits. Scent lures are far less effective than baits for bear hunting. 8-0-0
- ▶ #85 Support Residents should get a jump on sheep hunting seasons. 7-0-1
- ▶ #90 To delete the Wood River Controlled Use Area...restricts access to all Alaskans....Vote: Yea 2, Nay 4, abstain 2...failed
- ▶ #92 Oppose Restricting airboat use will greatly limit access to an area with a large population of moose access is already proving too difficult to manage moose populations in many unit 20 areas.0-8-0
- ▶ #98 Support 8-0-0
- ▶ #99 To allow trapping of black and grizzly bears under permit in McGrath EMMA...Non-selective...will trap cubs etc...predator control Vote: Yea 4, Nay 3, Abstain 1 Approved
- ▶ #102 Oppose 0-8-0
- ► #104 Support 8-0-0
- ▶ #106 Oppose 0-8-0
- ▶ #108 Support 8-0-0
- ▶ #110 Support, Any increase in the Delta herd will take some pressure off of dwindling herds in other easily-accessed areas.
- ▶ #112 Support
- ▶ #113 Oppose
- ▶ #114-135 The Anchorage AC generally supports the opportunity to hunt cow moose if there is a threat to habitat. 7-1-0
- ► 136-138 The Anchorage AC generally supports tag Fee Exemptions for brown bears. 8-0-0

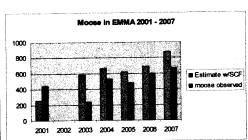
The anchorage advisory continues to support the board's decision to Implement a drawing system for Unit 13d and 14a sheep hunts. The AC is split on the issue of Full Curl/Any Ram. Many of the members have no opinion on the Any Ram Issue.





# Moose population increases in Unit 19D near McGrath



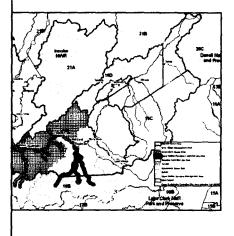


#### Unit 19A wolf take, 2001 - 2006

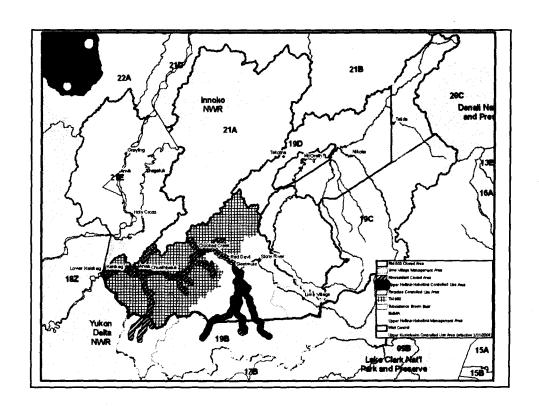
Regulatory Year	Regulatory Year Hunting and Trapping Harvest		Total Kill	
2001-2002	49	- 1	49	
2002-2003	25		25	
2003-2004	30	-	30	
2004-2005	29	43	72	
2005–2006	33	47	80	
2006–2007	3	7	10	



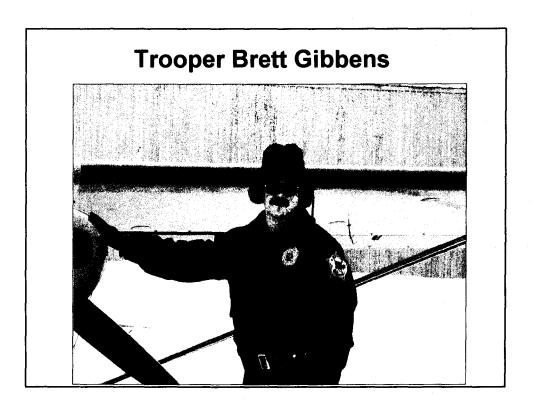
Unit 19D East wolf take, 2001 - 2006



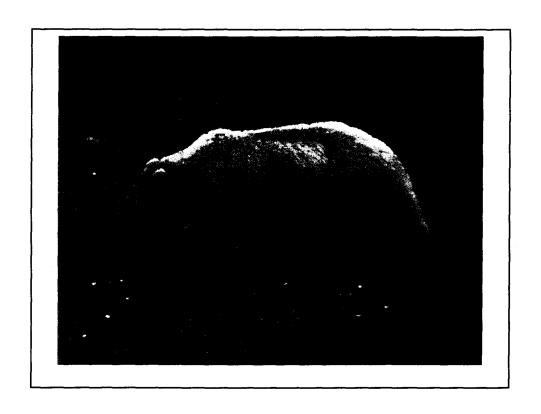
Regulatory Year	Hunting and Trapping Harvest	Wolf Control Take	Total Kill
2001~2002	24	-	24
2002-2003	39	-	39
2003-2004	10	17	27
2004–2005	15	14	29
2005–2006	11	4	15
2006–2007	19	2	21



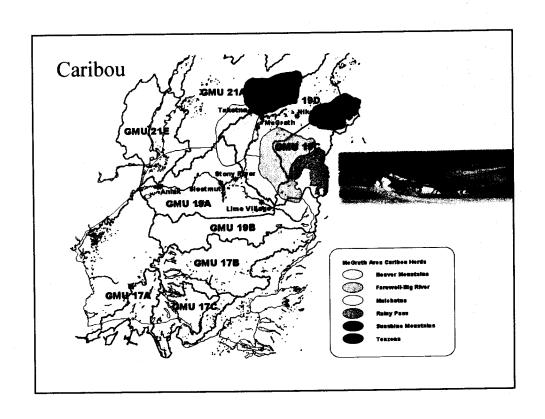


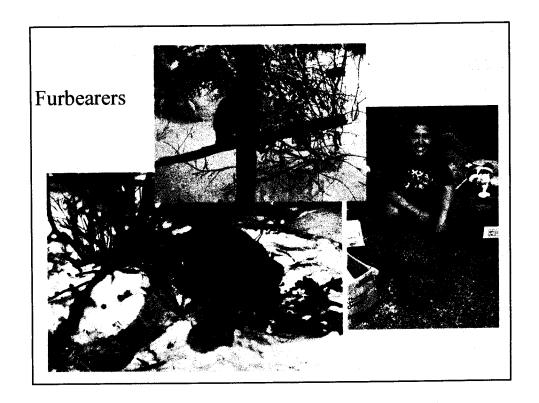


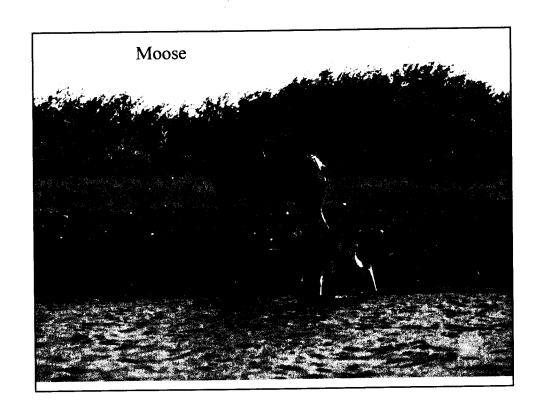


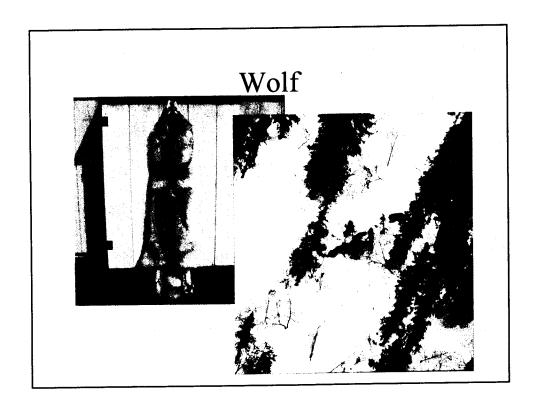




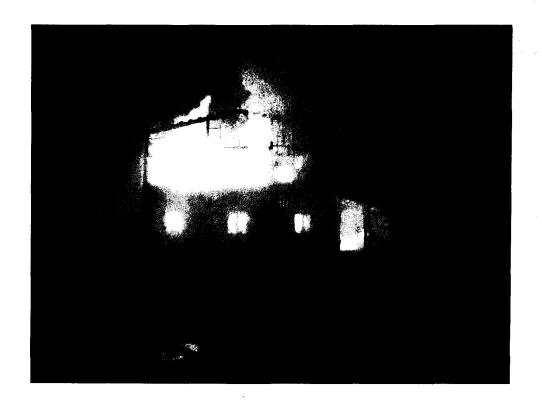












#### Effect of the proposal:

Open resident SF 50 moose hunting in Unit 19A within the Holitna River upstream of and including Titnuk Creek, and the Hoholitna River upstream of Little Diamond Mountain.

<u>Department recommendation:</u> Do Not Adopt



### Current vs Proposed comparison: Unit 19A upstream of the George River and excluding the Lime Village MA

- Current regulation
  - Residents and Nonresidents:
    - No open season

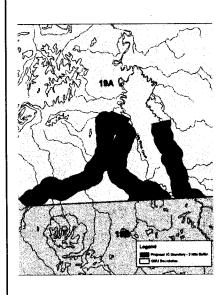


(Unit 19B residents: Season: Sept 1 – 20

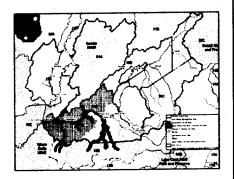
Bag limit: 1 bull with spike fork or 50" antlers with 4 or more brow tines on one side)

- Proposed regulation for the portion of Unit 19A within the Holitna River, upstream of Titnuk Creek including Titnuk Creek and the Hoholitna River, upstream of Little Diamond Mountain:
  - Residents:
    - Sept 1 25
    - One bull w/spike fork or 50 inch anters, or 4 or more brow tines on each side.
  - Nonresidents:
    - No open season ( the area described is within the Nonresident Closed area)

## Proposal 10 hunt boundaries



 Holitna River upriver from the Titnuk, the Titnuk, and the Hoholitna River upriver from Little Diamond Mt.



# Recommendation: DO NOT ADOPT

- Moose hunting closed in this portion of Unit 19A
- Moose density is still low
- Initial stages of population growth
- All recruitment needed for growth
  - Closed season and wolf control in place
- Opening 19A before the allowable harvest is greater than the ANS in this area is inconsistent with the CKMMP which does not favor Tier II hunts

## Moose population data

- Density estimate in February 2005
  - 0.27 moose/mi<sup>2</sup> ±16%, 90% CI
  - Need 0.5 moose/mi<sup>2</sup> to increase the harvestable surplus enough to satisfy ANS (140)
- Density estimate planned for March 2008
- IM population objective for Units 19AB
  - **13,500 16,500**
  - 0.76 0.93 moose/mi<sup>2</sup>
- We have not achieved our IM population objective

#### **Spring Twinning Surveys**



- Late May 2007
  - Holitna
    - 7 twins of 11 litters (64%)
  - These data suggest high twinning rate, and habitat could support higher moose densities

# Moose fall composition data

- Nov 2005
  - Units 19A/B, Holitna
    - 307 moose
      - 24 calves:100 cows
    - 8 bulls:100 cows
      - 5 yearling bulls:100 cows
      - 12/19 bulls were yearlings
- Nov 2007
  - 19A, Holitna survey
    - 200 moose
      - 45.0 calves:100 cows
    - 35 bulis:100 cows
      - 21 yearling bulls:100 cows
      - 23 yearling bulls, 12 med bulls, 4 large bulls



- Effect of the proposal:
- Open resident SF 50 moose hunting in Unit 19A within the Holitna River upstream of and including Titnuk Creek, and the Hoholitna River upstream of Little Diamond Mountain.
- Department recommendation:
- Do Not Adopt



Effect of this proposal:

Eliminate antler restrictions in Unit 19B for residents

Extend the resident moose season by 5 days

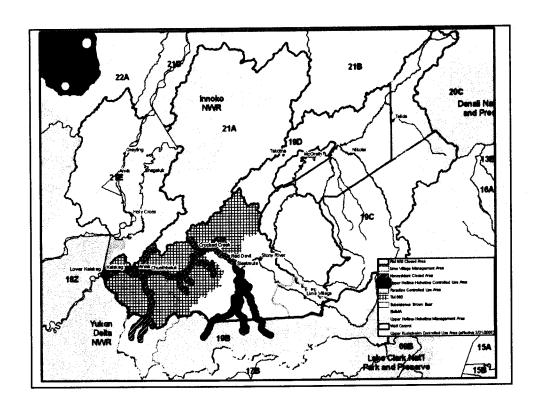
<u>Department</u> <u>recommendation:</u> Do Not Adopt



### Current vs Proposed comparison: Unit 19B moose seasons and bag limits (outside NR closed area)

- Current regulation
  - Resident:
    - Sept 1 20
    - One bull
      - SF 50 4 brow tines
- Proposed regulation
  - Resident:
    - Sept 1 25
    - Any antlered bull

- Nonresident:
  - Sept 5 20
  - One bull
    - SF 50 4 brow tines
- Nonresident:
  - Sept 5 20
  - One bull
    - SF 50 4 brow tines



- Unit 19B moose density is low
  - Current regulation adopted in March 2006
    - Adjacent Unit 19A densities were low and falling
    - 0.27 moose/mi² ±16%, 90% CI (19A Feb 2005)
- Spike-fork 50" 4 brow tine bag limit allows hunting opportunity
  - consistent with CKMMP
  - 66 bulls:100 cows (19B Fall 2005)

# Moose population data

- Density estimate in Unit 19A February 2005
  - 0.27 moose/mi<sup>2</sup> ±16%, 90% CI
- Density estimate planned for March 2008
  - only in Unit 19A
  - No density estimate planned for Unit 19B
- Conservative harvest in Unit 19B

### Unit 19B moose harvest

<u>Year</u>	Successful residents	Successful nonresidents	Successful unk	<u>Other</u>
2003	17 (69)	33 (104)	3 (4)	DMC 40
2004	13 (66)	33 (84)	1 (1)	RM640 Began
2005	14 (64)	28 (71)	0 (1)	RM640 required
2006	5 (48)	20 (55)	3 (3)	Antier restrictions
				Preliminary
2007	5 (28)	11 (36)	0 (0)	data

(number in parenthesis is total number of hunters)

Average total harvest in Unit 19B 2003 – 2007 = 46.5 Average since antler restrictions = 22

# Proposal 14 Summary

Effect of this proposal:

Eliminate antler restrictions in Unit 19B for residents

Extend the resident moose season by 5 days

<u>Department</u> <u>recommendation:</u> Do Not Adopt



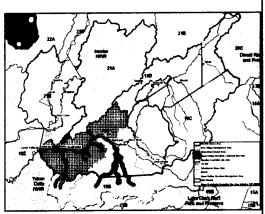
#### Effect of the Proposal:

Eliminate antler restrictions in Unit 19B for "subsistence hunters"

Extend the resident moose season by 12 days

# <u>Department</u> <u>recommendation:</u>

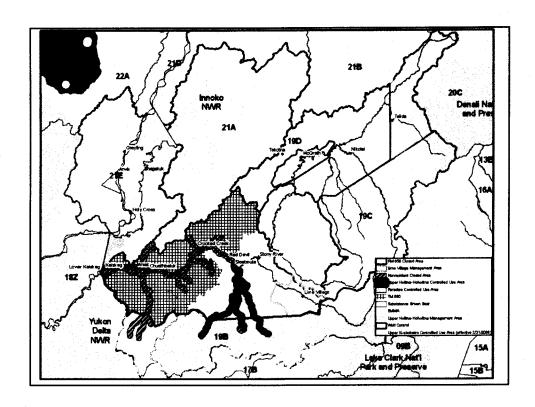
Take No Action based on action taken on proposal 14



### Current vs Proposed comparison: Unit 19B moose seasons and bag limits (outside NR closed area)

- Current regulation
  - Resident:
    - Sept 1 20
    - One bull
      - SF 50 4 brow tines
  - Nonresident:
    - Sept 5 20
    - One bull
      - SF 50 4 brow tines

- Proposed regulation
  - Resident:
  - Resident:
    - Aug 25 Sept 25
    - Any antiered bull
  - Nonresident:
    - Sept 5 20
    - One bull
      - SF 50 4 brow tines



- Moose density is probably still low
  - Current regulation adopted in March 2006
    - Adjacent Unit 19A densities were low and falling
    - 0.27 moose/mi<sup>2</sup> ±16%, 90% CI (19A Feb 2005)
- Spike-fork 50" 4 brow tine bag limit allows hunting opportunity
  - consistent with CKMMP
  - 66 bulls:100 cows (19B Fall 2005)

# Moose population data

- Density estimate in Unit 19A February 2005
  - 0.27 moose/mi<sup>2</sup> ±16%, 90% CI
- Density estimate planned for March 2008
  - only in Unit 19A
  - No density estimate planned for Unit 19B
- Conservative harvest in Unit 19B

## Unit 19B moose harvest

<u>Year</u>	Successful residents	Successful nonresidents	Successful unk	<u>Other</u>
2003	17 (69)	33 (104)	3 (4)	RM640
2004	13 (66)	33 (84)	1 (1)	Began
2005	14 (64)	28 (71)	0 (1)	RM640 required
2006	5 (48)	20 (55)	3 (3)	Antler restrictions
2007	5 (28)	11 (36)	0 (0)	Preliminary data
2005	14 (64)	28 (71) 20 (55)	0 (1) 3 (3)	RM640 required Antler restrictions Preliminary

(number in parenthesis is total number of hunters)

Average total harvest in Unit 19B 2003 – 2007 = 46.5 Average since antler restrictions = 22

# Proposal 14 Summary

Effect of this proposal:

Eliminate antler restrictions in Unit 19B for residents

Extend the resident moose season by 5 days

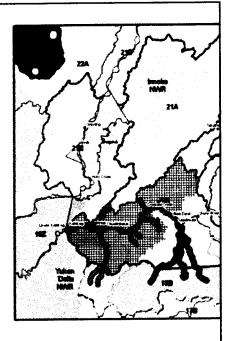
<u>Department</u> <u>recommendation:</u> Take No Action



Effect of the Proposal: Close moose hunting within the 19B portion of the Holitna-Hoholitna Controlled Use Area

#### Department recommendation: Do Not Adopt

The Holitna-Hoholitna CUA consists of that portion of the Holitna River downstream from Kashegelok, the Titnuk Creek downstream from Fuller Mt. and the Hoholitna River downstream from the confluence of the South Fork and the main Hoholitna River.



# Current vs Proposed comparison:

Unit 19B moose seasons and bag limits

(except within the NR closed area)

- Current regulation
  - Residents:
    - Sept 1 20
    - One bull
      - SF 50 4 brow tines
- Proposed regulation
  - Within the Holitna-Hoholitna CUA
    - Residents and Nonresidents
      - No open season
  - Remainder of Unit 19B
    - Residents
      - Sept 1 − 20
      - One bull
        - SF 50 4 brow tines
    - Nonresidents:
      - Sept 5 20
      - One bull
        - SF 50 4 brow tines

- Nonresidents:
  - Sept 5 20
  - One bull
    - SF 50 4 brow tines

- Limited hunting opportunity is available in Unit 19B through SF 50 restrictions
  - 66 bulls:100 cows
  - consistent with CKMMP
- Moose numbers in Unit 19A were low
  - 0.27 moose/mi<sup>2</sup> ±16%, 90% CI

## Proposal 13

- Unit 19A comp counts increased from 2005 to 2007
  - 8 bulls:100 cows to

35 bulls:100 cows

- 5 yearling bulls:100 cows to 21 yearling bulls:100 cows
- 24 calves:100 cows to

45 calves:100 cows

- 2008 Density estimate pending
- There may be some violations in Unit 19A as described in the proposal, but they have not prevented improved population parameters

## Unit 19B moose harvest

<u>Year</u>	Successful residents	Successful nonresidents	Successful unk	<u>Other</u>
2003	17 (69)	33 (104)	3 (4)	
	40 400	22 (24)	4 (4)	RM640
2004	13 (66)	33 (84)	1 (1)	Began RM640
2005	14 (64)	28 (71)	0 (1)	required
				Antler
2006	5 (48)	20 (55)	3 (3)	restrictions
2007	5 (28)	11 (36)	0 (0)	Preliminary data
2007	J (20)	11 (30)	J (U)	

(number in parenthesis is total number of hunters)

Average total harvest in Unit 19B 2003 – 2007 = 46.5 Average since antler restrictions = 22

# Unit 19B moose hunters by residency and method of access

Re yea	- 1		Success Nonresi		Unsuco Resider		Unsucce Nonresi		Total residents	Total nonresidents
	Plane	Boat	Plane	Boat	Plane	Boat	Plane	Boat		
200	5 4	1	17	3	28	15	29	5	48	55
200	7 1	4	10	1	11	11	25	0	28	36

# Unit 19B moose hunters by residency and method of access

dia metroa or access							
Year	Resident boat hunters	Resident airplane hunters					
2006	67% (16/24)	41% (32/78)					
2007	94% (15/16)	26% (12/47)					
Total	78% (31/40)	35% (44/125)					

# Summary points

- Unit 19B season with antler restrictions is a conservative harvest strategy consistent with the CKMMP.
- Abuses in Unit 19A have not prevented improved population composition measures
- Closing the moose season within the Holitna-Hoholitna CUA in Unit 19B would have a greater impact on resident than nonresident hunters.

## Proposal 13 Summary

- Effect of the Proposal:
   Close moose hunting within the 19B portion of the Holitna-Hoholitna
   Controlled Use Area
- Department recommendation:
- Do Not Adopt

Effect of the proposal: Eliminate the Holitna-Hoholitna Controlled Use Area

<u>Department recommendation</u>: Do Not Adopt



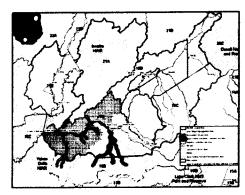
#### Current vs Proposed comparison:

#### Current regulation:

Within the Holitna River downstream from Kashegelok, the Titnuk Creek downstream from Fuller Mt. and the Hoholitna River downstream from the confluence of the South Fork:

This area is closed to the use of any boat equipped with an inboard or outboard motor(s) with an aggregate horsepower in excess of manufacturer's rating of 40 HP for taking big game, including transportation of big game hunters, their gear, and/or parts of big game, from Aug 1 – Nov 1.

Proposed regulation: Eliminate this regulation.



# Recommendation: DO NOT ADOPT

- 1) This was described in the CKMMP as a "key regulation" already in place before the planning process and retaining it is consistent with that plan
- 2) Moose hunting in Unit 19A is closed.
  - Unit 19A moose hunting opportunity drives interest in using this drainage
    - Other big game considerations are subordinate

#### History

■ This Controlled Use area was established in 1992 to reduce conflicts between hunters using boats with greater than 40 HP (generally from downriver) and those using motors with 40 HP or less (generally Unit 19A residents)

#### User conflict recognition

- User conflicts between upriver and downriver users exist when there is an open season
- While the moose hunt is closed in Unit 19A there is no conflict and as stated, 19A moose hunting drives hunter interest in this area

## Other points to consider

- 1) When moose hunting in Unit 19A reopens, we anticipate a need for low hunting pressure
  - This CUA could assist
- 2) Limited Unit 19B moose hunting
  - Nov 2005 (66 bulls:100 cows) (0.27 moose/mi²)
  - Residents Sept 1 20 SF 50" bag limit
  - NR Sept 5 20 SF 50" bag limit
    - Bag limit is largely responsible for low hunting pressure
  - This CUA contributes to low hunting pressure in 19B

# Low hunting pressure desirable as Unit 19A moose is reestablished

- High potential for lots of pressure
  - RM640 Registration permit hunts in 19A had high participation despite difficulty getting permits
    - **2004**

1031 permits

**2005** 

1086 permits

- Previously, this high hunting pressure drove bull:cow ratios low
  - Nov 2005
    - Units 19A/B, Holitna 8 bulls:100 cows
- High potential that the Holitna-Hoholitna CUA is useful upon reopening 19A
  - Leave it on the books and re-evaluate upon reopening 19A

#### Proposal 87 Summary

Effect of the proposal:

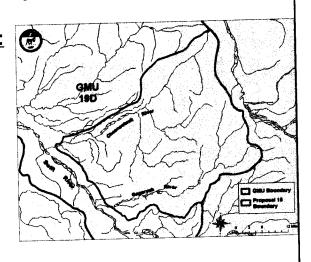
Eliminate the Holitna-Hoholitna Controlled Use Area

Department recommendation:

Do Not Adopt

Effect of the proposal:
Create a December moose season for residents in a portion of Unit 19D

<u>Department</u> <u>Recommendation:</u> Do Not Adopt



# Locate this area in context of other regulations in Unit 19D

Current vs Proposed comparison Unit 19: That portion between and including the Cheeneetnuk and Gagaryah river drainages, excluding that portion within 2 miles of the Swift River

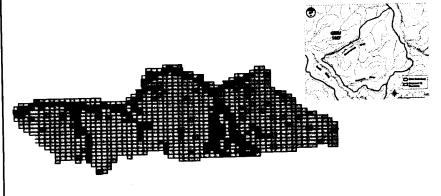
- Current regulation
  - Residents:
    - Sept 1 20
    - One bull

- Proposed regulation
  - Residents:
    - Sept 1 20
    - One bull
  - And:
    - Dec 1 31
    - One bull
  - Nonresidents:
    - Sept 5 20
    - One bull
      - SF 50 4 brow tines

- Nonresidents:
  - Sept 1 20
  - One bull
    - SF 50 4 brow tines

# Recommendation: DO NOT ADOPT

- Moose density in adjacent Unit 19A is low
  - 0.27 moose/mi<sup>2</sup> ±16%, 90% CI (19A Feb 2005)



# Unit 19D UCUs 0201 and 0301 moose taken during RY03 – RY07 by residency and transportation type

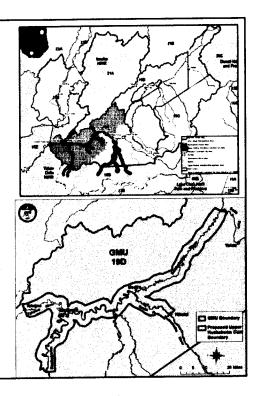
Reg Year	Successful residents		Successful Nonresidents		01.000		Unsuccessful nonresidents		Total
	Plane	Boat	Plane	Boat	Plane	Boat	Plane	Boat	
RY03	1	1	3	0	0	0	7	0	5
RY04	0	2	3	0	0	2	4	0	5
RY05	0	1	5	0	1	0	3	0	6
RY06	0	1	3	0	0	1	2	0	4
RY07 Preliminary	2	2	3	0	2	0	7	0	7

## Proposal 15 summary

- Effect of the proposal:
- Create a December moose season for residents in a portion of Unit 19D
- <u>Department Recommendation:</u>
- Do Not Adopt

Effect of the proposal: Change the Upper Kuskokwim CUA from a broad area to a river corridor

<u>Department</u> <u>recommendation:</u> No Recommendation



#### Recommendation: No Recommendation

- This is an allocation issue among hunters using boats and those using aircraft
  - We are not concerned that an increase in aircraft use would result in overharvest because hunters still need RM650 permits and moose numbers have increased
- After March 31, 2008, the CUA will be reduced in size to its former geographic area according to a sunset provision in 5 AAC 92.540(7).
- If the Board chooses to adopt this proposal, the Department recommends that a 4-mile wide corridor be established rather than a 5 mile wide corridor, consistent with the size of other corridors in Unit 19.
- The board should also evaluate whether a reduced CUA would still provide a reasonable opportunity for subsistence uses.

#### Current vs Proposed comparison:

Current regulation:

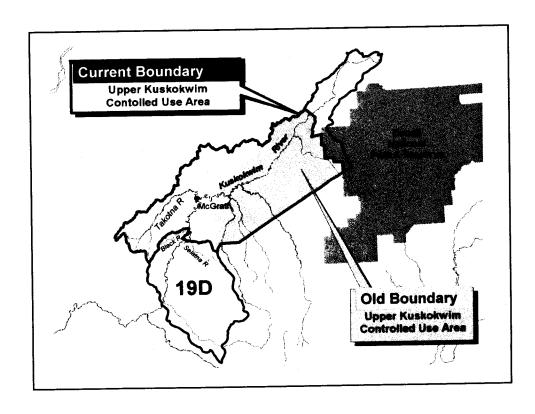
The Upper Kuskokwim CUA consists of that portion of Unit 19D upstream from the mouth of the Selatna River, but excluding The Upper Kuskokwim CUA consists of that mouth of the Selatha River, but excluding the Selatha and Black River drainages, to a line extending from Dyckman Mt. on the northern 19D boundary southeast to the 1,610 ft crest of Munsatli Ridge to the 2,981 foot peak of Telida Mt, then northeast to the intersection of the western boundary of Denali Nat1. Preserve with the Minchumina-Telida trail then south along the western trail, then south along the western boundary of Denali Nat'l Preserve to the southern boundary of Unit 19D.



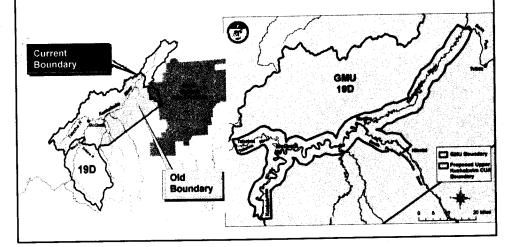
 Current regulation as of March 31, 2008:

e Upper Kuskokwim CUA consists of that portion of Unit 19D upstream from the mouth of Big River, including the drainages of the Big River, Middle Fork, South Fork, East Fork, and Tonzona River and bounded by a line following the west bank of the Swift Fork (McKinley Fork) of the Kuskokwim River to 152 50 W. long. Then north to the boundary of Denali Nat'l. Preserve, then following the western boundary of Denali Nat'l. Preserve north to its intersection with the Minchumina-Telida winter trail, then west to the crest of Telida Mt. then north along the crest of Munsatli Ridge to an elevation of 1,610 ft. then northwest to Dyckman Mt. and following the crest of the divide between the Kuskokwim River and the Nowitna River Kuskokwim River and the Nowitna River drainage, and the divide between the Kuskokwim River and the Nixon Fork River to Loaf Benchmark on Halfway Mt, then south to the west side of Big River drainage to the point beginning.

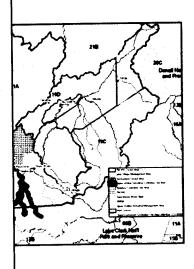
In the areas defined above, moose hunting is closed during moose season to the use of aircraft, including transportation of any moose hunter, their hunting gear and/or moose parts. (It does not apply to publicly owned airports).



- Proposed regulation:
  - The Upper Kuskokwim Controlled Use Area consists of an approximate five-mile corridor along the Kuskokwim from the Black River to the Swift Fork, along the Takotna River to Takotna and along the South Fork to Nikolai.

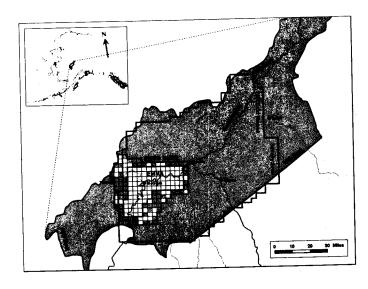


#### RM650 moose permit

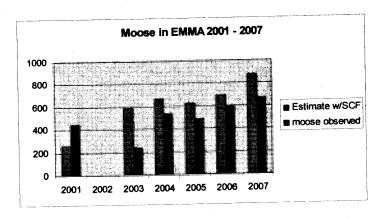


- Needed to hunt moose in Unit 19D upstream from the Selatna and Black River drainages (referred to as Unit 19D East)
- Available in McGrath, Takotna, Nikolai, and Medfra during July 14 – Aug 22
- Several seasons within this area: Sept 1 15 in a small area around McGrath that was formerly closed; Sept 1 20 upriver of Takotna; Sept 1 25 in remainder of 19D East

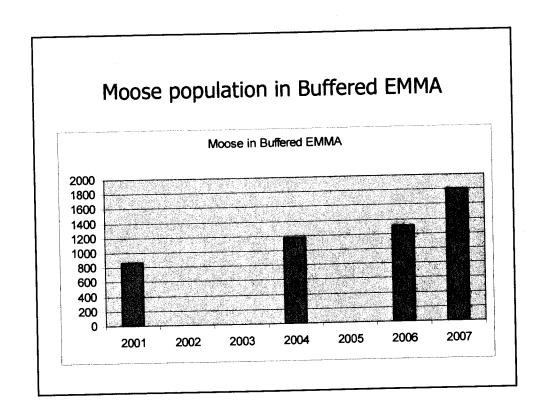


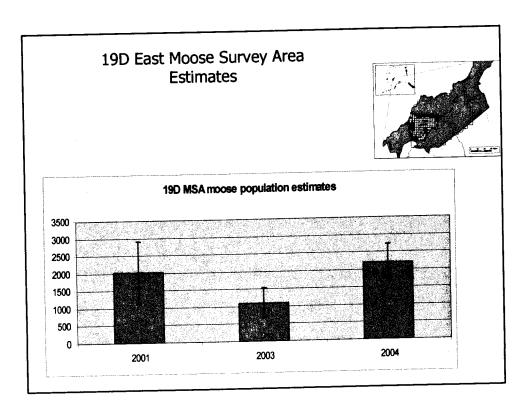


## Moose population in EMMA

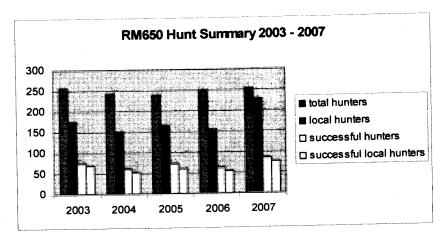


In 2003, 52% of the EMMA units were counted. SCFs varied 1.17 - 1.33





#### RM650 Harvest Summary RY03 - RY07 by residency



Since the inception of RM650 only 35 of 1805 (2%) of permittees used something other than a boat

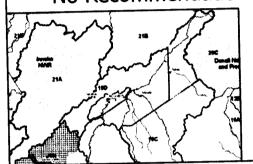
#### Airplane access not a concern

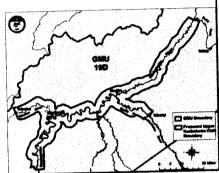
- 1) RM650 registration permit to hunt moose in Unit 19D East;
- 2) the moose population in the McGrath area is growing;
- 3) and aircraft access beyond the river is limited.

Because of these, relaxing the restrictions on aircraft through the sunset provision or through this proposal does not pose a population concern.

#### Proposal 88 summary

- Effect of the proposal:
   Change the Upper Kuskokwim CUA from a broad area to a river corridor
- Department recommendation:
   No Recommendation





Effect of the proposal: Eliminate the Nonresident caribou seasons in Units 19A and 19B

<u>Department recommendation:</u>
No Recommendation



# Recommendation: No Recommendation

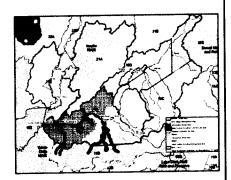
- This is an allocation issue
- Mulchatna Caribou regulations have been standardized across the range of the MCH
  - Includes 4 area offices, 3 regions, multiple federal agencies all requiring coordination
  - The Dillingham Fish and Game office is primarily responsible for MCH management



#### Current vs Proposed comparison:

- Current regulation:
  - Within the NR Closed area
    - Residents: Aug 1 Mar 15
      - 2 caribou, not more than one bull may be taken, and only one caribou can be taken between Aug 1 – Jan 31
    - Nonresidents:
      - No open season
  - Remainder of Units 19AB:
    - Nonresidents: Sept 1 Sept 15
      - One caribou
        - (hunter orientation required)
    - Residents: Aug 1 Mar 15
      - 2 caribou, not more than one bull may be taken, and only one caribou can be taken between Aug 1 – Jan 31

 Proposed regulation:
 Close NR caribou hunting in Units 19A and 19B



Unit 19AB caribou	harvest b	y residency
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Regulatory year	Uni	t 19A	Unit	Total (includes unknown residency)	
	Resident	Nonresident	Resident	Nonresident	
2003-04	51 (80)	13 (28)	169 (224)	267 (333)	508 (674)
2004-05	13 (44)	11 (21)	49 (87)	122 (195)	196 (349)
2005-06	35 (85)	3 (16)	46 (85)	75 (170)	159 (360)
2006-07	13 (36)	5 (11)	23 (51)	32 (86)	74 (186)
2007-08 preliminary	0 (2)	0 (0)	1 (19)	22 (41)	23 (62)

Note substantial reductions for NR hunters.

NR Seasons and bag limits:

2006-07 Aug 10 – Sept 30 One caribou 2007-08 Sept 1 – Sept 15 One caribou

We are not yet able to assess these recent changes

#### MCH caribou harvest by Unit – total killed and total hunters

Regulatory	Unit 19A	Unit 19B	Total MCH hunters (includes unknown residency)	
year	Resident and	Resident and		
	Nonresident	Nonresident		
2003-04	64 (108)	436 (557)	3182 (4100)	
	2% (3%)	14% (14%)		
2004-05	24 (65)	171 (282)	2236 (3241)	
	1% (2%)	8% (9%)		
2005-06	38 (101)	121 (255)	2070 (3084)	
1	2% (3%)	6% (8%)		
2006-07	18 (47)	55 (137)	921 (1540)	
	2% (3%)	6% (9%)		
2007-08	0 (2)	23 (60)	265 (414)	
preliminary	0 (1%)	9% (14%)	preliminary	
	Preliminary	Preliminary		

## Proposal 11 Summary

- Effect of the proposal:
- Eliminate the Nonresident caribou seasons in Units 19A and 19B
- <u>Department recommendation:</u>
- No Recommendation