

Tanana Chiefs Conference Orville H. Huntington, Director Wildlife & Parks 122 First Avenue, Suite 600 Fairbanks, Alaska 99701

Phone: 1-800-478-6822 Ext. 3256

907-687-6788

orville.huntington@tananachiefs.org

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Tanana Chiefs Conference thanks the Board of Game for consideration of our recommendations from Wildlife & Parks Comments to BOG Interior Alaska Proposals 2017,

The proposals that Tanana Chiefs Conference Wildlife & Parks (TCC WP) Program fully supports are 46, 47, 51, 52, 57, 58, 75, 82, 102 and 108.

The proposals TCC WP offer friendly amendments to support are 94, 101, and 105.

The proposals TCC WP has decided to strongly oppose are 63, 65, 69, 80, 95, 96, 104, 113, 131, 132, 139 and 142.

The proposals TCC WP will also offer amendments to if the Board decides to support 96.

Defer to local Advisory Committees on 67 and 111. Respect to others cultural beliefs on bears.

## Proposal 94 Amendment 5 AAC 85.045

To meet unmet local subsistence needs in Galena and surrounding area with their climate change proposal TCC WP recommend the September resident hunt be 1-4 for any bull, and the September 26–30 for small bulls only and set to 10 animals. This would remove the waste of taking large rutting bulls late in the season where 86 or more moose could be taken for antlers and the meat useless. There is a harvestable surplus of small bulls in the area should hunters not have any success during competitive September 5-25 resident hunt season. And we strongly disagree with State staff analysis that climate records are representative of current measures of scientific rigor. If you access the NWS current data in its entirety we are into severe climate change where action and proper regulation is warranted. We were in 3 record breaking and increasing warm winters, and the pace continues increasing in Alaska and globally.

## Proposal 101 Amendment 5 AAC 92.XXX

To meet cultural and traditional needs in Fort Yukon TCC WP supports proposal 101 with added language of Alaska Native Celebration of Life if the local AC approves of the amendment. Otherwise we defer to the local AC on their proposal for the Yukon Flats area.

Proposal 105 Amendment 5 AAC 85.025

To establish the Central Arctic Caribou Hear (CACH) at historical levels TCC WP shares concerns of local resident hunters about the rapid decline of the CACH since 2010. We agree with local hunters that the current actions that will be presented in the RC and A&R are the minimum to reduce detrimental harvest of cows;

**NW 26B, residents** (this remains the same as current seasons and bag limits: 5 caribou/day, July 1-June 30; however, cow caribou may be taken, July 1-May 15.

**Remainder of Unit 26B**, residents: 2 caribou, Aug. 1-Apr 30, however cow caribou may only be taken Nov. 1-Apr. 30

Unit 26B, nonresidents: I bull, Aug 1-Sept 15.

TCC WP agrees with local area residents and with the Department these actions are imperative to stabilize this decline, or at least reduce human additive to the decline.

At a minimum TCC WP agrees with resident hunters who would like to see additional measures taken at this time to grow the herd back to a level that promotes larger range use. Larger herds cover more area, thus more use by people of a wider area.

At this time adopt the DFG A&R and RC amended language for proposal 105.

In addition direct the DFG to EO cow caribou hunting in 26B remainder, after March 1, 2017 until November 1, 2017.

Caribou have about half the reproductive capacity of moose. Caribou never have twins and are subject to winter hardships because they are grazers, which do not affect moose.

Snow greater than 3 feet, ice events, and or late springs over stress and reduce fecundity of cow caribou.

If a moose population had more than a 50% population decline there would be a complete closure of any cow harvest.

Caribou hunting has a higher incidental *harvest mortality factor* (wound-loss) than singular species like moose. Wound rates for caribou should be between minimums of 15-30%. The preliminary reported harvest for this regulatory year 2016/17 of 176 cows in GMU26B is a **minimum** human mortality. The 2016/17 regulatory year harvests has been 45% cows, so far. This is a very high cow harvest proportion.

With over a cumulative 200-cow human caused mortality during this season there is a great need to **Emergency Order** closure of cow harvest in GMU26B remainder after March 1, 2017. There are increasing numbers of hunters using dog teams from the Dalton highway the last two years. If no more than 75 cow harvest should be taken in the analysis, this current seasons harvest has exceeded that threshold by 250%.

Cows lead the main migrations. Killing lead cows most of the time can deflect herd movements. Experienced lead cows have range knowledge, and are more adept at predator avoidance. Protection of cows especially in the fall hunt is extremely important.

The Western Arctic, Teshekpuk, and now Central Arctic caribou herds are in need of reduced cow harvest.

All three herds should have uniform harvest regulations in GMU 22, 23, 24, 25A west, and 26 A&B.

Cow harvest season should be October 1 to February 1. Bull caribou harvest should be February 1 to October 10. Protecting bulls when they are low grade. These seasons would allow caribou harvest throughout the year wherever they are on their ranges, but would eliminate cow harvest when they are predominantly migrating and when calving. That is a future proposal to look at.

In addition to the support we offer local resident hunters in Alaska TCC WP also recommends taking action to return to normal movements of the CACH and restore it to traditional management that has been practiced for thousands of years before State and Federal management that has led to declines and unhealthy characteristics we see in the CACH now.

We all know what can happen when you open hunting to an area that has not been hunted heavily in the past. In wildlife science we rely on wildlife populations to have source areas (Furrer and Pesinelli 2016; Harvenson et al 2004) where there are thought to be minimal hunting pressure of large mammals to increase diversity of the hunted species in question. When you open a new area with hunters who do not know traditional take strategies and hunt it hard it may take years if not decades to recover. In this case the haul road has been a major hunting area for four decades and the CACH has never been back into the Middle and Lower Koyukuk River Valley where it use to summer. Historically the majority of hunting use within these areas in this region was largely after the leaders migrated into the Upper Koyukuk River Valley. As stated by resident hunters in their testimony and from the Western Arctic Caribou Head Working Group Elders, you let the leaders of the herd pass then the others will follow. When these animals venture far from the source of their birth lands they can get harvested at a sustainable level in regard to the overall population. But when you go after leaders and drive them back then you remove a portion of the animals that have never been significantly hunted and then expose the entire CACH to unsustainable hunting pressure. The Board in the past has set up management that follows recommendations of hunters who derive hunting management practiced for thousands of years (Huntington 1993).

The intent of this proposal is to reduce hunting pressure but it is the critical wildlife science and traditional and historical management that needs to be addressed here. When you look at what happened with Game Management Unit (GMU) 24 there was initially no protections along the Dalton Highway Corridor Management Area (DHCMA) for caribou or other animals. The new hunters with no traditional background along the road targeted and continue to target leaders of the CACH that for thousands of years had migrated into middle and lower GMU 24 to critically important summer range. The original history of the area and animals were carried through wisdom keepers in our culture as well as our neighbors Kobuk River Elders (Attla 1989; Nelson 1986). Through extremely poor management our caribou herd has not migrated back into the Lower Koyukuk and Melozitna River area for over 4 decades now, a herd the Director of TCC

WP carries the Native Alaskan name of. This is the type of bad science and wildlife management we want to avoid in the future and fix a broken system of management, and we should be looking at all ways of understanding complicated systems in the face of climate change and severe weather that create conditions that impact our caribou and animals (Huntington 2000; Watson and Huntington 2008; Huntington and Watson 2012).

There are many instances where the Board of Game followed wisdom of our Elders in rural areas of the State of Alaska. When the late Sidney Huntington sat on the Board of Game he created Controlled Use Areas that still exist today (Huntington 1993). He could see more than just competition should be addressed in these areas for prudent management of wildlife. It is no secret he and his brother the TCC WP Director's father the late James Huntington and respected Galena Elder Donald Stickman did their own predator management before anyone else saw the value of what it meant to those who needed game to hunt to survive (Huntington 1966). But those areas also protect source moose and caribou populations that birth and have core calving areas far from the river where they thrive until they venture into hunting areas along the river and mountains of our great State. Along the Koyukuk and Middle Yukon River these moose populations still show strong diversity because by creating management areas that make sense to common hunters and the science community you enhance sustainable hunting privileges to all.

In our opinion we feel the Department of Fish and Game needs the tools to manage this area as it is open to the general public. Every bit of information needs to be considered and all ways of knowing should be our base of understanding in these changing times. The adaptive management strategy will come forth as local and urban Advisory Committees create fair regulations along the DHCMA. We all benefit by protecting State resources along the pipeline road if we plan for long-term uses rather than short term strategies that never work. With the changes in our climate in Alaska and throughout the world we need more community based research data to understand all aspects of our world (Huntington et al.2006), and when you look at current management of fish and game it should be with an open mind to create more opportunity for future generations of hunters and trappers.

At this time adopt the DFG A&R and RC amended language for proposal 105, and at some point properly manage the CACH with traditional management strategies.

In addition direct the DFG to EO cow caribou hunting in 26B remainder, after March 1, 2017 until November 1, 2017.

We feel there may be potential to recover harvest populations within the Corridor but with adaptive management and regulations in place we should be all be able to enjoy hunting in the area in the future. These are our management concerns and we do not feel that they are allocative in nature. But if the Board feels that way we understand and would like as much public participation for discussions of this matter into the future. We hope you will deal with this issue now, rather than wait for something that is less than sustainable when it comes to prudent management of wildlife in the area for future generations of hunters and trappers.

## **Citations/references:**

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## Proposal 96 Amendment

The TCC WP opposes this proposal but should the Board decide for some reason to consider it at all then we recommend there be no Non-resident season during this winter hunt. With fewer hunting opportunities for resident hunters, then that harvestable surplus should go to Alaskans who have very few caribou in the region to harvest.

The Wildlife and Parks program at TCC appreciates all the Boards Hard work and if you have any questions we will be happy to answer them or get back to you.