ATTN: AK BOARD OF GAME

Comment for Proposal 108, SAAC 92.052. Discretionary permit hunt conditions and procedures.

Comment from Bryan Tulare, user/hunter of Unit 21E since 1997

I would like to voice my opposition of this proposal.

My opposition of this proposal stems from hunting in the area since 1997 and seeing how things have changed since then. Without getting personnel and pointing fingers I will point out something that seems to be the main cause of why “local hunters are not meeting the ANS (amounts reasonably necessary for subsistence) and the current moose hunt is unsustainable” in the Unit 21E Area. I contribute this to the rising fuel prices and I have been told this numerous times over the years by local residents from the villages of Shageluk, Holly Cross and Grayling.

In stating the above I would also like to see data statistics that permit holders of the RM836 have hurt the harvest quota for the local residence and subsistent hunters. Again, as mentioned above from other hunters of nearby villages, one just needs to get out of the boat and walk into the brush to locate moose. In the lower portion of the Paradise Control Use Area where I hunt I have noticed a decline in the amount of users/hunters then I have seen in years passed. I too see the fuel prices being a major factor in traveling within the water way of the Innoko River as it has limited my movement in the area as well.

Also, as stated in Proposal 47- 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045 Hunting seasons and bag limits for moose (before it was revised) stated that “Unit 21E- The unit 21E predation control plan in 19.124(b) authorizes predation control for wolves and bears to aid in achieving moose IM objectives for moose. Moose in Unit 21E have a positive findings in SAAC 92.108 for providing high levels of harvest for human consumptive use, with a population of 9,000-11,000, and a harvest objective of 550-1,100. As outlines in 5 AAC 99.025, Unit 21 has a positive C&T finding for moose and ANS of 600-800, including those taken in Unit 21E”. I would like to see data how this statistic would compare to this Proposal 108 and why ADF&G would need to collect any samples given the above statement of “having high levels of harvest for human consumptive use”.

As I can imagine the Board of Game and ADF&G does not want to hear rumors nor get into a “he said she said thing”. I apologize for mentioning the above “hear say statements” however I would like to see more data, facts and findings on this Proposal 108 to substantiate the need for the Board of Game to consider this action.

In conclusion the Innoko River and the Paradise Control Use Area is a very beautiful place and all measures do need to be taken to protect this area. Please consider taking seeking more time for statistical data/fact finding input and allow more time for user comments if you consider this Proposal any further. Many years ago ADF&G would mail out flyers for this area to users. I naturally assumed I got this information because I hunted and visited this area. I would suggest this as a possible course of action to gain further user input among others things that could be done.

[Signature]

Bryan Tulare

Eagle River, AK