

Eastern Interior Alaska Subsistence Regional Advisory Council  
C/o Office of Subsistence Management  
United States Fish and Wildlife Service  
1110 East Tudor Road, Mail Stop 121  
Anchorage, Alaska 99503

Re: Eastern Interior Alaska Subsistence Regional Advisory Council Comments to the Alaska Board of Game on 2019/2020 Alaska Board of Game proposed changes to State regulations for the Western Arctic/Western Region and the Interior and Eastern Arctic Region

March 5, 2020

The Eastern Interior Alaska Subsistence Regional Advisory Council (Council) held its public meeting in Fairbanks, Alaska on March 3-4, 2020. Members reflect the interests of Federally qualified subsistence users, sport users, and commercial users throughout the region. The meeting reflected a quorum, with eight of eight members present including Susan L. Entsminger of Mentasta Pass, Alaska; Andrew P. Firmin of Ft. Yukon, Alaska; William L. Glanz of Central, Alaska; Andrew W. Bassich of Eagle, Alaska; Robert C. Wright, Sr. of Tanana, Alaska; Charlie Jagow of Porcupine River, Alaska; Donald A. Woodruff of Eagle, Alaska; and Timothy J. McManus of Nenana, Alaska. The Council identified the following comments on 2019/2020 Alaska Board of Game proposed changes to regulations for the Western Arctic/Western Region and the Interior and Eastern Arctic Region. Comments to the Alaska Board of Game are provided under the provisions of Section 805 (a)(3)(D) of the Alaska National Interest Lands Conservation Act (ANILCA). The Council wishes to share information and raise a number of concerns aligned with the implementation of Title VIII of ANILCA and the continuation of subsistence uses in the Eastern Interior Alaska Region.

## **PROPOSAL 45**

### **5 AAC 92.080(15). Unlawful methods of taking game; exceptions.**

Prohibit the use of moose, caribou, and reindeer urine as scent lures in the Interior and Eastern Arctic Region. Proposed by GASH (Grayling, Anvik, Shageluk, Holy Cross) Fish and Game Advisory Committee (EG-F19-020).

The Council recommended to **support** Proposal 45. The Council noted familiarity with the use of urine as a scent attractant or lure for moose. The Council also noted this practice has been used successfully to help harvest moose in the very small area where 5 were taken with urine bags.

## **PROPOSAL 49**

### **5 AAC 92.085. Unlawful methods of taking game; exceptions.**

For the Interior and Eastern Arctic Region, allow the use of crossbows in archery only hunt areas for hunters possessing permanent identification cards. Proposed by Jim Sackett (EG-F19-082).

The Council recommended to **oppose** Proposal 49. The Council noted that if hunters cannot use a cross bow, they could take a rifle.

### **PROPOSAL 50**

#### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish registration archery only hunts for bull moose in the Interior and Eastern Arctic Region Units that have general moose seasons. Proposed by the Alaskan Bowhunters Association (EG-F19-136).

The Council recommended to **oppose** Proposal 50. The Council does not support a 10-day addition for the archery season and stated there is already a long enough season available.

### **PROPOSAL 51**

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

Remove the bag limit restriction of one sheep every four years for nonresidents over the age of 60 hunting in the Interior and Eastern Arctic Region. Proposed by Hunter and Gatherers Lives Matter (EG-F19-134).

The Council recommended to **oppose** Proposal 51. The Council noted special privilege should not be for non-residents. The Council also noted that special seasons for non-residents make guides look bad.

### **PROPOSAL 53**

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

Establish an archery only registration permit hunt for Dall sheep in the Interior and Eastern Arctic Region. Proposed by the Alaskan Bowhunters Association (EG-F19-111).

The Council recommended to **oppose** Proposal 53. The Council noted conflicts with subsistence and youth hunts.

### **PROPOSAL 54**

#### **5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska. Proposed by the Alaska Department of Fish and Game (HQ-F19-153).

The Council recommended to **support** Proposal 54. The Council noted the proposal reduces the burden to purchase unused tags and benefits Federally qualified subsistence users.

### **PROPOSAL 55**

#### **5 AAC 92.085(5). Unlawful methods of taking big game; exceptions.**

Allow the use of dogs for hunting lynx in Units 12 and 20. Proposed by Tyler Obrien (EG-F19-093).

The Council recommended to **oppose** Proposal 55. The Council noted the proposal is disrespectful of lynx and would create conflicts with other users and their own dogs.

### **PROPOSAL 56**

#### **5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**

Establish minimum distance requirements for trapping around dwellings in the Interior and Eastern Arctic Region. Proposed by Doug and Opal Welton (EG-F19-040).

The Council recommended to **oppose** Proposal 56. The Council noted that if the proposal passes, youth who learn to trap near their homes will no longer be able to do this. The Council noted this practice is critical for future generations.

### **PROPOSAL 63**

#### **5 AAC 92.530(7). Management areas.**

Repeal the Dalton Highway Corridor Management Area. Proposed by the Fairbanks Fish & Game Advisory Committee (EG-F19-116). Proposed by the Fairbanks Fish & Game Advisory Committee (EG-F19-116).

The Council recommended to **oppose** Proposal 63. The Council noted the proposal would result in many user conflicts. The Council also noted that many who practice the subsistence way of life oppose this proposal.

### **PROPOSAL 64**

#### **5 AAC 92.530 Management areas.**

Clarify the legal use highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area (DCHMA) for hunting and trapping. Clarify the use of firearms, and transport of furbearers and trapping bait when trapping in the DHCMA. Proposed by the Alaska Department of Fish and Game (HQ-F19-152).

The Council recommended to **oppose** Proposal 64. The Council noted the rules and regulations have been in place a long time and changes to the rules and regulations would result in confusion. The Council addressed the first paragraph, noting that people who exit the DHCMA return home; use a rifle; and emphasized to the need to keep the corridor in place. The Council also emphasized the need to clarify the language of the proposal and recommended a much more detailed proposal in the future.

### **PROPOSAL 82**

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

#### **5 AAC 92.530(X). Management areas.**

Establish the Arctic Village Sheep Management Area in Unit 25A, open a new resident and nonresident drawing hunt for sheep within the area, and change the bag limit for nonresident registration permit, RS595. Proposed by the Eastern Interior Alaska Subsistence Regional Advisory Council (EG-F19-139).

The Council recommended to **support** Proposal 82 **with modification**. The Council motioned to exclude everything but the winter hunt area and amend the motion for Proposal 82 to state Unit 25A sheep to change the 3 sheep limit to 1 ram with horn destruction (RS595) for October 1<sup>st</sup> – April 30<sup>th</sup>. This is the only change the Council made to the existing State regulation. All other regulations would remain. The Council noted the existing 3 sheep harvest limit from October 1<sup>st</sup> – April 30<sup>th</sup> is too liberal and hunters harvesting the limit, could affect the continuation of healthy populations of sheep in the RS595 area.

### **PROPOSAL 83**

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

Modify the bag limit for sheep in the RS595 hunt in Unit 26C. Proposed by Leonard Jewkes (EG-F19-123).

The Council recommended to **support** Proposal 83. The Council motioned to exclude everything but the winter RS595 hunt and amend the motion for Proposal 82 to State Unit 25A sheep to change the 3 sheep limit to 1 ram with horn destruction (RS595) for October 1st – April 30th. This is the only change the Council made to the existing State regulation. All other regulations would remain. The Council noted the existing 3 sheep harvest limit from October 1st – April 30th is too liberal and hunters could harvest the limit, which could affect the continuation of healthy populations of sheep in the R595 area.

### **PROPOSAL 84**

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

Extend the sheep season in the Dalton Highway Corridor Management Area within Units 24A, 25A, and 26B. Proposed by Austin Manelick (EG-F19-065).

The Council recommended to **oppose** Proposal 84. The Council noted the proposal encourages a bow specific hunt after the end of an already long season. The Council noted opposition to lengthening any sheep seasons into October.

### **PROPOSAL 85**

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

Open an archery only registration sheep hunt in the Dalton Highway Corridor Management Area in Units 24A, 25A, and 26B. Proposed by Austin Manelick (EG-F19-066).

The Council recommended to **oppose** Proposal 85. The Council noted the proposal encourages a bow specific hunt after the end of an already long season. The Council noted opposition to lengthening any sheep seasons into October.

### **PROPOSAL 86**

#### **5 AAC 92.113(a). Intensive Management Plans III.**

Reauthorize the Upper Yukon-Tanana Predation Control Program. Proposed by the Alaska Department of Fish and Game (HQ-F19-149).

#### **5AAC 92.113. Intensive Management Plans III.**

(a) Plans established, Intensive management plans for the Upper Yukon-Tanana area in Units 12, 20B, 20D, 20E, and 25C. Proposed by the Alaska Department of Fish and Game (HQ-F19-149).

The Council recommend to **support** Proposal 86. Can be used if and when necessary. If this goes away, substantial effort would be required to re-establish authority to conduct intensive management in the area. Otherwise, authority expires June 30, 2020. The Council noted this wildlife management strategy should not be eliminated as an option, and is an tool in the toolbox.

### **PROPOSAL 87**

#### **5 AAC 85.025. Hunting seasons and bag limits for caribou.**

Change for the Fortymile caribou registration hunt in Unit 20 to a drawing hunt with a longer season. Proposed by Janner Morgan (EG-F19-062).

The Council recommended to **oppose** Proposal 87. The Council noted there would be no limit of draw permits distributed and therefore there would be no effect. The Council added the coalition has spent the years since 1991 working hard on the Fortymile Caribou Herd issues. The years of work would be lost.

### **PROPOSAL 88**

#### **5 AAC 92.113. 113(1). Intensive Management Plans.**

Resume intensive management for wolves in a portion of Unit 12 and 20D. Proposed by the Upper Tanana Fortymile Fish and Game Advisory Committee (EG-F19-059).

The Council recommended to **support** Proposal 88. The Council noted support for re-establishing authority to continue intensive management, rather than letting this expire. The Council noted that this is an important management tool for the State that otherwise would be lost.

### **PROPOSAL 89**

#### **5 AAC 90.052. Discretionary permit hunt conditions and procedures.**

Allow hunters to possess registration permits for both caribou (RC860) and moose (RM865) while hunting in Unit 20E. Proposed by Joel Mitchell (EG-F19-068).

The Council recommended to **oppose** Proposal 89. The Council noted that people have learned to get around it, but if rescinded, harvest will increase. The Council also noted the potential for over harvest and dangerous practices in an already crowded area.

### **PROPOSAL 90**

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

Allocate up to 25% of nonresident drawing tags for sheep in the Tok Management Area to second degree kindred relatives. Proposed by Lance Kronberger.

The Council recommended to **oppose** Proposal 90. The Council noted the proposal moves the balance of benefits to nonresidents of the State of Alaska, who are already being accommodated.

### **PROPOSAL 91**

#### **5 AAC 85.065. Hunting seasons and bag limits for small game.**

Reduce the bag and possession limits for grouse in a portion of Unit 20D. Proposed by the Delta Fish & Game Advisory Committee (EG-F19-067).

The Council recommended to **support** Proposal 91. The Council is concerned about the occurrence of local over harvest. The Council noted people travel long distances to hunt this area because of social media and publications. The Council added the local pattern is to hunt later in the season, and by then very few grouse are available for harvest due to lots of early season

hunting pressure and the lack of birds available later in the season when locals hunt.

#### **PROPOSAL 140**

##### **5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20B. Proposed by the Alaska Department of Fish and Game (HQ-F19-175).

The Council recommended to **oppose** Proposal 140. One Council member questioned why we have a cow moose hunt in their area where they use moose for memorial potlatches; locals notice less moose in the area than they have seen historically; and don't harvest cow moose except for memorial potlatch needs.

#### **PROPOSAL 141**

##### **5 AC 85.045. Hunting seasons and bag limits for moose.**

Eliminate registration moose permit hunt RM785, in the Minto Flats Management Area in Unit 20B. Proposed by the Tanana Rampart Manley Fish & Game Advisory Committee (EG-F19-127).

The Council recommended to **support** Proposal 141. The Council noted there are not enough moose allocated to meet the needs of villages. The permits are going predominantly to Anchorage and Fairbanks residents. The Council added that there are not enough antlerless moose to satisfy ceremonial needs and that moose have become scarce. The Council emphasized that this is a bad conservation problem for local villages who cannot find moose to harvest, adding the Alaska Department of Fish and Game has been too slow to close the moose permit hunt.

#### **PROPOSAL 142**

##### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

Eliminate registration moose permit hunt RM785, in the Minto Flats Management Area in Unit 20B. Proposed by Anna Frank (EG-F19-122).

The Council recommended to **support** Proposal 142. The Council agreed with the proponent who emphasized, "...elimination of this cow moose hunt is necessary to assist ADF&G in appropriately managing moose for ceremonial uses, which is of higher priority than the Unit 20B drawing permit cow hunts that ADF&G has stated is threatened by ceremonial uses of cow moose in the greater Fairbanks Area."

#### **PROPOSAL 143**

##### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

Eliminate all antlerless moose drawing hunts in Unit 20B except for the Minto Flats Management Area. Proposed by Anna Frank (EG-F19-124).

The motion **failed** with 3 members of the Council in-support; 3 members of the Council opposed; and 2 members of the Council abstaining. ADFG&G historically left cow moose seasons open too long in the past and that lowered moose populations.

**PROPOSAL 145**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

Modify the nonresident bag limit for moose in Unit 25C. Proposed by Jormah Pope (EG-F19-031).

The Council recommend to **support** Proposal 145. The Council noted more antler restrictions are appropriate for nonresident hunters for conservation of moose. The Council added that there are too many hunters in the area.

Thank you for the opportunity for this Council to assist the Federal Subsistence Management Program in meeting its charge of protecting subsistence resources and uses of these resources on Federal Public lands and waters. If you have questions about this report, please contact me via Zach Stevenson, Subsistence Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456 or 907-786-3676.

Sincerely,

A handwritten signature in cursive script that reads "Susan Entsminger".

Susan Entsminger, Chair