

Alaska Board of Game
Nate Turner Comments: Proposals 62 and 114
March 7th, 2020

Proposal 62: seeks to eliminate most non-resident hunting opportunity in the upper Nowitna drainage by placing a 90/10 split in permit allocations for this remote drainage, disregarding several decades of use patterns that informed current permit allocations.

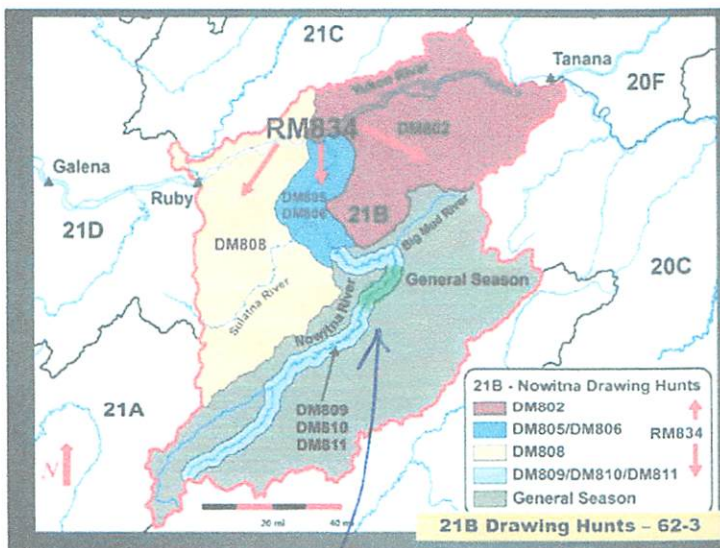
Some points I would request that the board consider regarding wildlife harvests in this area of Interior Alaska, and the potential outcome of this proposal:

- I have lived my entire adult life in this drainage with my family – for 30 years now - and for many years we were the only residents and trappers in the entire upper Nowitna drainage. Nearly our entire livelihood is derived from both trapping and guiding in this area.
- Today there are two other families living full time within this hunt area – both are trapping families, and both families have members who guide with me on these moose hunts. In total there are now 10 adults and 11 children who live within this hunt area and have benefited directly from these guiding opportunities, aside from other packers and assistant guides who work with me each season from Lake Minchumina, the Kantishna River, Nenana, and Fairbanks. I have only employed Alaskan residents as assistant guides throughout my career, with rare exception.
- Beyond trapping these guided hunts represent the only form of local employment in this part of rural Alaska, from Lake Minchumina to Ruby and from Tanana to Nikolai or McGrath.
- The DM809, DM810, and DM811 are trophy hunting permits – purpose of the permit is to avoid trophy destruction requirements. The RM834 registration hunt also allows for resident hunters to harvest ANY bull for a lengthened hunt period from August 22nd – August 31st, and September 5th and 25th. There is also a federal winter hunt for any bull in nearly the entire drainage.

For this reason, resident and non-resident hunters are not on equal footing for hunting opportunity in the area, contrary to what the proposal states. Even within the trophy hunting permits, nonresident hunters face substantially higher licensing costs and expensive tag requirements which offset the seemingly equal footing the permit allocation would indicate. These 7 DM811 moose hunters typically bring \$32,000 and \$42,000 in direct benefit to wildlife management activities in Alaska, when Pittman Robertson matching funds are considered.

- With rare exception, nearly all of the meat taken by these non-resident and non-resident alien hunters is donated locally to the guide's families and others in the area who have been unsuccessful with their own harvest efforts. A portion of this meat is donated to those in need in Fairbanks as well each year. Many Alaskans have benefited directly from these few hunts, both economically and through meat sharing.

- The proposal also requests that “unapplied for” or “underutilized permits” be transferred directly to resident applicants each season. With rare exception, these permits do not go unused each year. For many years there were two guides sharing these permits, contrary to assertions in the proposal, and I left several permits unapplied for each fall for the use of the neighboring guide at the headwaters of the drainage. He did the same for me. Some years he did not use them, so I was able to have my hunters apply for them using the underutilized permit application process, as is done elsewhere in this GMU and across the state each fall. A secondary factor is that I have a small guiding business and attend one hunting show each February – 6 weeks after the drawing permit application deadline. It is not possible to be fully booked one year in advance for many guide operations in Alaska, my own included, and the underutilized permit process allows for smaller guide operations to fill their hunts during the normal booking season.
- A point that has not been addressed about the upper Nowitna region is that there is a canyon that divides the DM809, DM810, and DM811 permit hunt area and is likely most responsible for a long-established separation of resident/ nonresident use patterns:
 - Most resident hunters use the area below the Nowitna canyon where there are long established family and individual use patterns, reasonable river boat access (if far), and a much larger moose population. I have avoided guiding in this portion of my guiding area to avoid interrupting or competing with other resident hunters.
 - Above the canyon there is a lower moose density, difficult river access (at times essentially impossible by river boat and requiring expensive aircraft charters with limited landing opportunities), and very little resident hunting activity. There are some years I see 2-3 resident hunters in this portion of the permit area, other years where I see none. The majority of DM810 resident moose permits are used below the canyon each year.



Proposal 62 – Allocate 90% of Drawing permits to residents in 21B

Unit 21B Moose Harvest

Unit and regulatory years	Avg. number of resident hunters	Avg. number of nonresident hunters	Avg. resident harvest	Avg. nonresident harvest
Unit 21B – All				
1997–2006	168	28	63	11
2007–2018	195	25	67	10
Upper Unit 21B				
1997–2006	15 (63%)	9 (37%)	8	5
2007–2018	15 (60%)	10 (40%)	9	6

21B Drawing Hunts – 62-6

Canyon Area that limits most boat activity.

- As the department has shown with the participation and harvest data in the ANR's, the current permit division and structure remarkably captured these historical use patterns – without causing a decline in resident opportunity nor did it increase non-resident hunter or guide opportunity. These groups have for decades been typically hunting in different areas, and without conflict or complaint. If the permits are altered as Proposal 62 requests, I believe the result will be that a large portion of the upper Nowitna River will go un-hunted each season due to prohibitive transportation and lower moose density factors I have already outlined.

Proposal 114

I am requesting that proposal 114 be Amended to include Subunit 21B. As noted above, I live in Unit 21B for the majority of each year and am very familiar with the small bands of the Sunshine herd that are scattered throughout the area, but largely inaccessible during the normal fall season. This limitation is largely due to extremely limited access scenarios. Other residents of the area and I have discussed this limitation over the past several years and were intending to make a similar request as the McGrath AC has proposed.

Some points we would offer for consideration:

- These groups have been seemingly stable to increasing over the years, and largely limited due to predation factors.
- The proposed hunt, if extended into 21B, would provide only a limited opportunity for local harvest of an otherwise entirely unutilized resource in 21B. Even with a winter season, these caribou will not always be readily available since they leave the highlands each fall and disperse into more timbered areas during the winter months. They return before / during calving season, long after the proposed season would be closed.
- Due to the greatly dispersed nature of the Sunshine herd, I believe aircraft restrictions are not necessary and may unnecessarily prohibit harvest in some cases.
- If Proposal 114 is Amended to include Subunit 21B, we would request that it not be required to pick up the permits in McGrath for this subunit, since this would make it impossible for residents in 21B to acquire them in most cases.
- It is unlikely that this hunt will be crowded or overutilized due to the remote aspect of much of the area, and the antlerless-only requirement.
- The harvest could be initially limited by a limited registration permit, or alternatively closed by emergency order with a short reporting period.

Thank you for considering these comments

