



From: [Thor Stacey](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Cc: [Tibbles, Kristy R \(DFG\)](#)
Subject: Alaska Professional Hunters Association Public Comments- Nome Board of Game
Date: Friday, January 3, 2020 12:00:31 PM
Attachments: [APHA 2020 Region V Public Comments- Board of Game.pdf](#)

I am submitting the attached comments on behalf of the Alaska Professional Hunters Association (APHA)

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January 3rd, 2020

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Nome. APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board’s current allocative policies and believes that the current well-defined, species-specific resident preferences are in the best interests of all Alaskans.

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *“Economic Impacts of Guided Hunting in Alaska.”* More recently (2017), APHA partnered with SCI to add to and update McDowell’s 2014 seminal work. *“The Economic Importance of Hunters Visiting Alaska; Alaska’s Guided Hunting Industry 2015”* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none"> • 87.2 Million total economic output (2015) 	<ul style="list-style-type: none"> • 52.5 Million new dollars to Alaska (2015)
<ul style="list-style-type: none"> • More than 50% economic benefits occur in rural areas (2012, 2015) 	<ul style="list-style-type: none"> • 1,550 people directly employed, total employment with multipliers; 2,120 (2015)
<ul style="list-style-type: none"> • 89% Active Guides are AK Residents (2012) 	<ul style="list-style-type: none"> • Visiting hunters (guided & non-guided) purchase 13% of total Alaska hunting licenses (2015)
<ul style="list-style-type: none"> • Guided hunters are approx. 3% of total hunters in the field (2015) 	<ul style="list-style-type: none"> • Visiting hunters (guided & non-guided) contribute 72% of total revenue to the ADFG wildlife conservation fund (2015)

Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or “Bush Alaska.” APHA worked with McDowell to quantify what some of the benefits Alaskans reap from Guided Hunting. In 2015 30 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 20 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 230,000 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2015.



Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region V regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all of its members to participate in the drafting of these comments. Our teleconferences were well attended with good representation from guides who conduct hunts in every Region in the state. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Proposal #1- OPPOSE:

Proposal #1 would contravene legislative intent and should be summarily rejected. AS 16.05.255 is clear that residents have a statutory allocation priority (AS16.05.255(d)) but that intensive management (IM) should:

"...restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board" (AS16.05.255(e))

Nothing in AS 16.05.255 suggests that the *"human consumptive goals of the board"* may not include a non-resident allocation. Aside from the long-term human consumptive goals alluded to in AS16.05.255, the legislature had the opportunity to clarify in plain statutory language its intent to close non-resident participation during an IM program. Nowhere in Alaska statute does the legislature give any such direction. Non-resident participation and an active IM program are not mutually exclusive.

Proposal 1 should fail because it misconstrues the plain statutory language in AS 16.05.255 by suggesting there is a need to enshrine another layer resident hunter preference, above and beyond *amount(s) necessary for subsistence (ANS)*. The legislature and the Board of Game have done a good job describing their goals and implementing IM programs, while giving preference to Alaskan residents. This Board of Game should not tie future boards hands with an additional layer of pre-emptive regulation. APHA supports the legislature's intent outlined in AS16.05.255 that provides for IM and a strict resident preference for moose, caribou, deer and elk.



Intensive Management Population Thresholds Change:

An important aspect of how the IM population objectives are set is that they are flexible and can be changed depending on a variety of criteria. Certain areas in the state initiate IM when populations are not severely depleted but are more at a midpoint in their cycle. These areas often times have non-resident opportunity allocated even when IM is being considered. Non-residents should not be excluded from allocation schemes where the population thresholds for IM are well above population low points. Proposal 1 could have the unfortunate and unintended effect of lowering population thresholds for considering IM in GMUs and Regions that have done the work to make IM a more proactive rather than a reactive management tool.

Non-Residents Harvest Predators While Hunting for Ungulates:

Guided non-residents harvest predators in remote areas of the state while hunting for “prey species.” Often times these harvest patterns can show a “net gain” where the effects of secondary predator harvest not only compensate for ungulate harvest but are a net gain where predator:prey is concern. Guided non-resident hunters can be another tool in ADFG’s toolbox, especially in remote areas, where additional harvest of predators is desired. Passing a blanket exclusion on non-resident participation when IM plans are in place will take a tool out of ADFG’s tool box at a time when we are trying to give ADFG more options, not less.

Non-residents Pay the Intensive Management Surcharge:

In 2016 the legislature passed HB137 and updated hunting license and non-resident tag fees. HB137 also incorporated an *intensive management* surcharge that would be paid by both residents and non-residents (resident IM charge \$10, non-resident IM charge \$30) as part of purchasing their hunting license. That the legislature agreed that IM benefits both residents and non-residents is important when considering Prop 1. The legislature could have defined IM as a “resident benefit” and only required residents to pay the surcharge. Instead, the legislature applied the same differential ratio paid by residents and non-resident for hunting licenses to the IM charge. IM was thus treated the same as plain-vanilla wildlife management where residents and non-residents fees are concerned. A blanked exclusion of non-residents when an IM plan is place will work against the benefits provided by IM to all hunters and reduce critical revenue that state should use to accomplish its management objectives.

Proposal #3: SUPPORT

APHA supports this proposal based on the conservation rational presented by the department.

Proposals 4&5: SUPPORT



APHA supports proposals 4 & 5 based on the given merits provided by ADFG. These proposals offer common sense solutions to identified problems with unpredictable weather patterns in these remote areas. Failure to pass these proposals could result in forgone harvest opportunity, habitat degradation and the possibility of lower populations due damaged browse. We thank the department for offering more opportunity to have a successful hunt in these difficult and expensive hunting locations.

Proposal #27: OPPOSE

APHA opposes prop 27 because it poses a conservation risk to the central arctic herd while ignoring the value of game management subunits to manage distinct caribou herds. GMU 26 is the largest GMU in the state, taking in all of the land north of the continental divide in Alaska. At least four caribou herds use GMU 26 during part of the year. The author of proposal 27 seeks to treat each herd the same by implementing a standard bag limit for non-residents of 2 bulls. This standardized approach to caribou bag limits may be convenient for air taxi operators from an operational perspective but it is not a conservation-based approach. Over time caribou herds fluctuate in abundance and herd composition. Certain herds can be thriving while others are struggling. ADFG managers prefer, at this time, to manage on a herd-by-herd basis if possible and this means utilizing GMU subunits to set seasons and bag limits. Prop 27 could work counter to achieving sustainable conservation objectives therefore we urge you to fail the proposal.

Proposal #29: SUPPORT with AMMENDMENT

APHA supports prop. 29 with the amendment to include up the bag limit to 2 brown/grizzlies for non-residents as well as residents. Data presented by the department describes a thriving bear population with current harvest levels well below sustainable levels. Non-residents bag limits should also be increased to take advantage of a large underutilized harvestable surplus of grizzly bears in Unit 26A.

Proposals 35 & 36: OPPOSE

APHA opposes proposals 35 & 36 because the authors are attempting to exclude “non-local” hunter effort by making registration difficult for the general public. There may be certain hunt structures or situations where requiring registration for a hunt in a specific location aids conservations objectives. APHA would support registration requirements that work to achieve conservation objectives but we oppose these proposals because they are being used for allocation purposes.

Proposal 37: OPPOSE

APHA opposes prop. 37 because current moose population and harvest levels in 22C



are within sustainable parameters at this time. Excluding non-resident hunters, who make up less than 1% of the hunters in the field, is not necessary to achieve harvest or population objectives at this time and will likely result in a net loss of some high quality, shared moose meat in the local communities. Passage of prop. 37 will only result in an unnecessary loss of economic opportunity mostly enjoyed by Alaskan residents that traditionally share harvested meat with local residents.

Proposal 40: SUPPORT

APHA supports prop. 40 because it will bolster the data set used by managers to adjust brown bear seasons in 22C. ADFG lays out a clear and concise rationale in support of prop. 40. APHA supports prop. 40 because we believe it will aid in conservation of grizzly bears in 22C.

Proposal 169:

APHA is supportive of a concise definition of what previously purchased “non-resident locking tag” means. Many guides across the state operate in remote areas where they have necessarily become license vendors to ensure their clients have all the required tags and licenses to legally prosecute their hunt. We would like to see responsible guides continue to sell hunting licenses and locking tags to their clients and others if they choose to. We are concerned about the potential for an onerous regulation to be adopted that will effectively preclude responsible guides from taking on the liability of selling licenses and tags to their clients and others.

Legal Tender:

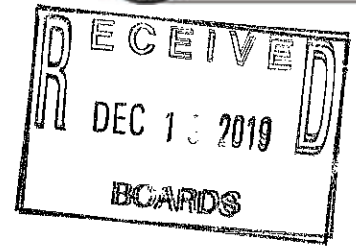
“Previously purchased” should allow for the purchase of tags and hunting licenses using legal tender such as: personal or cashier checks, cash, money orders, or credit cards. We are concerned that an excessively strict regulation could be written in a way that would prevent the remote purchase of licenses and tags if the money has to actually make it to the vendors account before the tags are valid.

Vendor Accountability:

Tag records should be assigned to individual vendors in the same way guided hunt records are assigned to contracting guides. This will remove the option for a hunter to temporarily "purchase tags" from a vendor who could then tear up the paperwork and refund the payment if the hunter is unsuccessful, contrary to the intent of the law. Requiring that vendors account for their license and sales records will prevent unethical vendors from developing a pattern of allowing clients to “return” un-used tags.



*Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708*



ADF&G

12/13/19

Boards Support Section

PO Box 115526

Juneau, AK 99811-5526

ATTN: BOG COMMENTS

Dear Chairman and Members of the Board:

The ATA appreciates the opportunity to offer the following comments on a proposal you will be considering at your January 2020 Western Arctic/Western meeting in Nome.

The ATA supports Proposal 18, the use of game bird backs and wings for trapping bait. Such use is very traditional, very effective, very popular and will not result in the loss of a significant amount of recoverable meat. We agree that wings and backs of geese, swans and cranes should not be discarded but argue that their use as trapping bait is productive and warranted.

We recommend that such use should be approved on a state-wide basis.

Thank you for this opportunity to comment.

Sincerely,

Randall L. Zarnke, President



RE: PROPOSAL 40: Require a registration permit for brown bear hunting in Unit 22C

Nome's road system offers residents and visitors alike great opportunities to view wildlife, including bears. Through my own small tour guiding business and as co-instructor of a University of Alaska Fairbanks Summer Sessions week-long birding program in Nome, I witness the great enjoyment and excitement visitors derive from observing bears along our road system. Also, friends and I enjoy seeing bears (from a distance, preferably!) while we are out on hikes. The proposal seems like a reasonable way to possibly slow bear harvest while allowing the department to better monitor brown bear population trends to inform future management decisions. Thank you!



RE: PROPOSAL 3: Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A

This is a house-keeping proposal. The brown bear population testimony for Unit 26A is that it's an expanding and under-harvested population and it can support additional harvest opportunity, so the \$25 exemption is warranted.



12/04/2019 03:17 PM AKST

RE: PROPOSAL 19: Open a year-round, resident season for caribou bull harvest in Unit 23

The bull-cow ratio is healthy enough in the Western Arctic herd to support this young bull harvest during the rut. The bull-cow ratio has risen to over 50 bulls per 100 cows. Recruitment has been good, so if there's younger bulls available for harvest there should be opportunity for that. Subsistence hunters should know not to take the older "stinky" bulls. The intention is for harvest of younger bulls in the population and not the breeding large bulls.



12/04/2019 03:20 PM AKST

RE: PROPOSAL 22: Extend the season for taking cow caribou in Unit 23 Remainder

The Commission does not want to increase Western Arctic caribou herd cow harvest past March 31 when the bull caribou are in good shape for harvesting. The cows are in late gestation in spring and there shouldn't be a cow harvest when the herd is still in recovery.



12/04/2019 03:22 PM AKST

RE: PROPOSAL 23: Restrict the use of snowmachines for taking caribou in Unit 23

Stopping the snowmachine while hunting caribou makes the most sense because you can get a better shot. You can pick out a good caribou when you're within 200 yards of them and a good shooter can get a caribou at 300 yards.



12/04/2019 03:24 PM AKST

RE: PROPOSAL 24: Remove the restriction on caribou calf harvest in Unit 23

A calf that lost its mother somehow should be able to be harvested. People don't typically target those, so there shouldn't be a large number of calves being harvested.



RE: PROPOSAL 26: Reauthorize the antlerless moose season in the western portion of Unit 26A

It's a straightforward house-keeping proposal.



12/04/2019 03:30 PM AKST

RE: PROPOSAL 27: Increase the nonresident bag limit for caribou in Unit 26

At this time the Teshekpuk caribou herd has a bull to cow ratio of 28 bulls per 100 cows which is below the management objective. We shouldn't be encouraging more hunting with an increase in the bag limit from 1 to 2 bulls. There are several air taxis that work in the Prudhoe Bay, Happy Valley, and Galbraith Lake areas. You can expect a large increase in the number of non-resident hunters by increasing the bag limit. Increasing the bag limit will also increase the number of transporters in local areas that resident hunters use. Air taxis cause interference with local hunts that happen in the late summer and fall and it creates a food security hardship on local communities. The Teshekpuk herd is a major provider for local subsistence users.



RE: PROPOSAL 28: Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope resident hunters

The RC907 isn't capturing the harvest information. The North Slope Fish and Game Advisory Committee thinks the North Slope Borough Department of Wildlife Management can better collect caribou harvest data through the hiring of subsistence specialists in each of the North Slope communities. The BOG should maintain the RC907 permit for non-local hunters, but replace the RC907 permit with the North Slope Borough harvest surveys for the local communities.



RE: Proposal 169: Clarify that big game tags be paid for and issued prior to hunters taking big game that require tags.

I support adding language to Licenses and tags and to the Definitions section where it clarifies that any hunter, whether resident or non-resident possess and pay for a locking tag prior to taking a big game animal.



Justin Horton, Soldotna AK. E3: Proposal #32

I have been guiding in this area for more than 11 years. During this time, I have yet to see any ear-tagged reindeer. It is my opinion that most hunters in this remote area would refrain from taking something so clearly identifiable. To close such a large area with such a low probability of a reindeer kill would not be to the benefit of the majority of individuals who hunt this area. Ethical and responsible hunters should have zero interest in harvesting local live stock.

My suggestion is that upon filling out the registration form, the hunter would be responsible for reading and initialing a clause worded something similar to: "Hunter acknowledges that they will be observant and mindful of tagged reindeer and will report any harvesting of said animal."

Unfortunately, due to work commitments, I am unable to attend this BOG meeting. I thank the BOG for their consideration of this comment while trying to work out what is best for all users of these resources and the land. I am happy to answer any questions by phone @ 907-244-2993.



Justin Horton, Soldotna AK. E5: Proposal #34

I would like to suggest a more defined geographic area for proposal #34. Bull moose tend to hang out in the higher country during the summer and early fall along the Continental Divide. This also happens to be a common border between 22D and 22E. These moose tend to then migrate to the lower American River for the winter.




It is my suggestion that this proposed hunt be amended to limit it to the upper American River; starting from the tributary mouths of Luther Creek and Bud Creek, to include those drainages and all tributary drainages upstream that flow into the American River. Please see the two attached maps titled "DM482" & "DM482 (1)".

Since the closure of RM842 a few years ago, I have seen a steady increase in legal NR bull moose - 50" or 4 (or more) brow tines in the upper headwaters of the American River and its tributaries. It has become a refuge of sorts from lack of hunting pressure these last few years. This has placed all the NR pressure on 22E. Currently residents are allowed to harvest any bull from Aug 10-Jan 31 with only two weeks closed from Sep 15-30. I see no reason why NR shouldn't have a limited opportunity as well? A drawing tag would allow for very controlled management of the NR hunting pressure in this more divided geographic area.

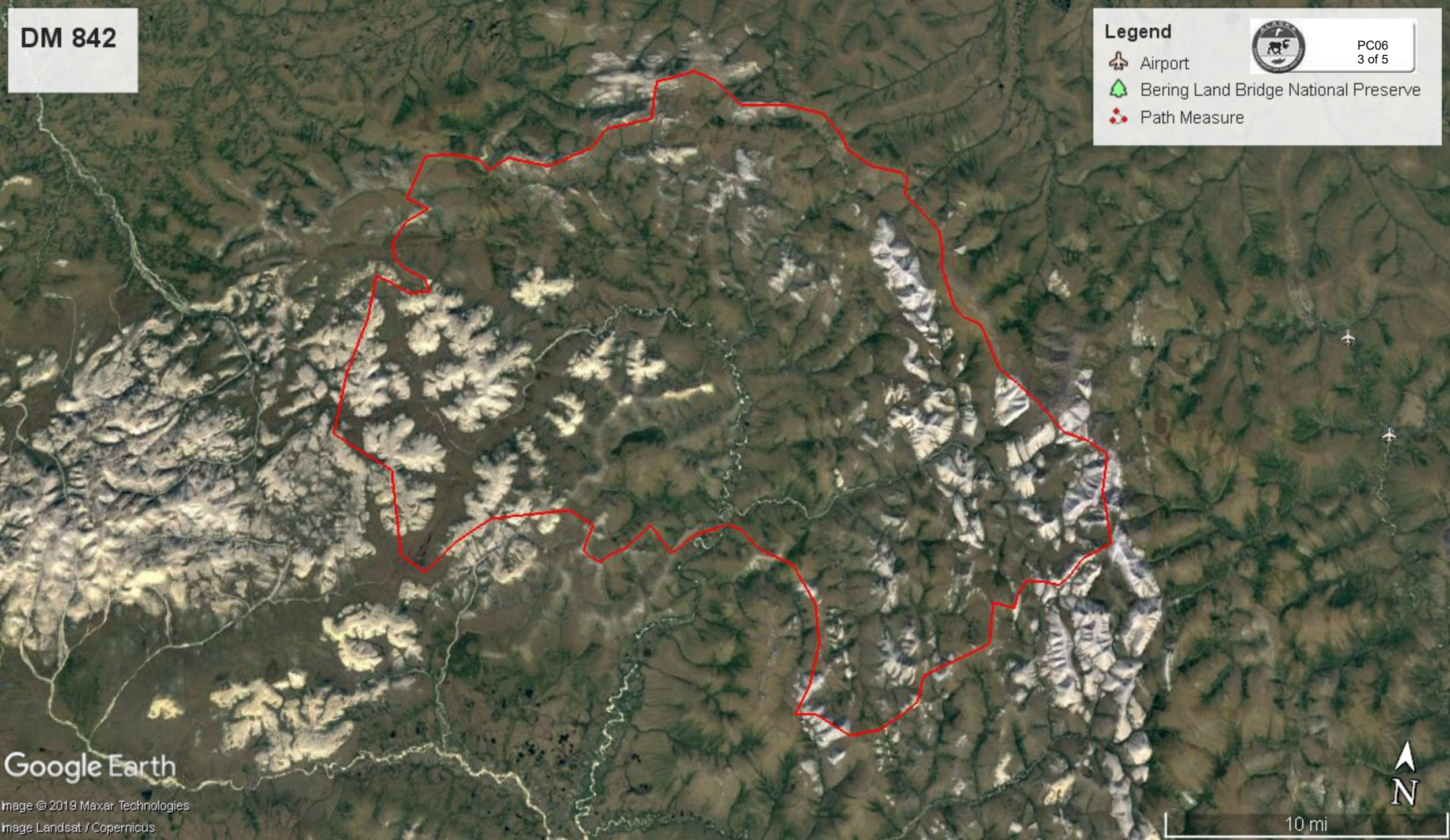
Unfortunately, due to work commitments, I am unable to attend this BOG meeting. I thank the BOG for their consideration of this comment while trying to work out what is best for all users of these resources and the land. I am happy to answer any questions by phone @ 907-244-2993.

DM 842

Legend

-  Airport
-  Bering Land Bridge National Preserve
-  Path Measure

 PC06
3 of 5






Google Earth


Image © 2019 Maxar Technologies
Image Landsat / Copernicus

10 mi



Legend

-  Airport
-  Bering Land Bridge National Preserve
-  Path Measure

 PC06
4 of 5

Kotzebue Sound



Bering Strait

Diomedé Islands

Lost River Shoal

Tin City Shoal

Google Earth

Image IBCAO
Image Landsat / Copernicus
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Image © 2019 TerraMetrics

60 mi





Justin Horton, Soldotna AK. E13: Proposal #42

Looking over several of the proposals, it seems apparent that many people perceive that moose predation is cause to consider for low moose numbers. Would these numbers rebound if more bears were harvested?

In the early spring the best mode of transportation is by snow machine and a very common practice is to use a motorized vehicle to locate and harvest spring bears.

If this proposal passes it would increase hunters in the field during the spring. It would most definitely see an increase in DB690 permits being awarded. NR hunters should be looked at as an opportunity to help manage this resource, as well as a valuable source of revenue for the local area and its communities. Previous guided hunts out of Shishmaref and Brevig Mission employed local help as well.

If nothing is done, the grizzly bears will likely still be taken illegally by individuals using motorized vehicles. Wildlife troopers will spend valuable time and money following up on complaints. Bears will continue to populate until eventually there is a predator control program initiated. A more proactive approach should be taken.

Unfortunately, due to work commitments, I am unable to attend this BOG meeting. I thank the BOG for their consideration of this comment while trying to work out what is best for all users of these resources and the land. I am happy to answer any questions by phone @ 907-244-2993.



Dear Alaska Board of Game,

My name is Seth Kantner. I am from Kotzebue and the Kobuk River. I submitted two proposals to the Board of Game for consideration concerning caribou hunting regulations in Unit 23. The proposals are listed as Proposal 21: Reduce bag limit for caribou in Unit 23, and Proposal 23: Restrict the use of snowmachines for taking caribou in Unit 23.

When I submitted Proposal 21, I believe I explained my reasoning.

In Proposal 23, to limit the speed and proximity to caribou allowed by hunters on snowmobiles, I now realize I didn't explain my reasoning when I submitted. I'd like to add that here.

I was born and raised on the Kobuk River ten miles below Onion Portage. Widespread use of snowmobiles here in the NW Arctic began about the time I was a toddler. In the fall most caribou generally migrated through that area and disappeared before the ice was thick and snow deep enough for travel on land. During the 1970's many caribou over-wintered on the tundra across from our sod house, near the Sand Dunes. In those days nearly all hunters using the Kobuk River Trail stopped at our home; many spent the night or nights. Hunters talked of chasing caribou, and how caribou got harder to catch as the winter passed and the groups became "chased too much". They also talked of lots of dead abandoned carcasses. At that time, it was fairly standard practice to leave a skinny animal, especially if a hunter was far from home—which snowmobiles had suddenly made more possible and more likely. Snowmobiles were also in the process of reducing need for meat for dog teams.

Those years were the first time I saw caribou being chased by snowmobiles. Early snowmobiles were tippy, narrow, slower than today, and prone to broken skis, boggywheels and many other breakdowns. The practice of chasing caribou, more or less, has continued all my life, and during the following decades, each passing year has brought faster and more reliable snowmobiles, and more people in more of a hurry to get animals. In the 70's and 80's people commonly chased caribou with snowmobiles, but back then those hunters who did so often carefully watched and listened for airplanes—because if a "Game Warden" was to appear it would be by plane, and because chasing was known to be illegal.

As the years passed, countless times when large numbers of caribou come near or through villages, I've witnessed hunting practices that often degraded to a very wasteful level. Over those same years, law enforcement here in the region has in many ways diminished, and, also bag limits on caribou have become basically non-existent, and laws concerning chasing have been rescinded making that practice basically legal.

Not surprisingly, as a result chasing caribou with snowmobiles has become a standard practice—anywhere, not just near villages--although near communities this practice is often more concentrated because of the concentration of hunters, hunter competition, and desire for



a quick hunt and a quick return to town. Also, near villages, individuals don't necessarily have to be experienced or capable hunters, but generally are very proficient at driving at extremely high speeds and tend to greatly prefer racing machines over "deep snow" or hunting/trapping machines.

Locally, when the subject of chasing comes up in a way that suggests it might be deemed bad or wrong or detrimental to caribou, people often are quick to blame "kids." This has been going on since I was a kid--a long time ago—and sadly is patently false. Kids didn't even have snowmobiles when I was young! We were the ones still stuck with dog teams!

The practice is now widespread, and common. When kids are actually doing this, they are simply doing what they've seen older hunters doing. In that way this practice is self-perpetuating. The practice actually is self-perpetuating in a second way, too, because once a group of animals has been chased, hard, and repeatedly, those animals become hard to approach WITHOUT chasing the hell out of them.

When large herds migrate directly in front of Kotzebue anyone can stand on Front Street and see this manner of hunting first hand. Two years ago--the last time large herds poured around the north and south ends of Kotzebue--so much high-speed chasing took place on the ice in front of town and the tundra that dead and wounded animals again were very common to come across anywhere and everywhere, abandoned and frozen. Dozens of caribou calves ended up dazed, lost and orphaned, walking the streets of Kotzebue, freezing behind buildings and in doorways. This was the first time many of us had seen so many calves orphaned and actually in town. This was because of intense chasing back and forth of groups of caribou, repeatedly, by hunters on the flat wide-open ice on extremely fast machines.

I witnessed this practice countless times, all my life. I have never noticed an age distinction of hunters in the practice. I have noticed that hunters seem much quicker nowadays to start the hunt by "squeezing the throttle" instead of first trying to let the caribou come to them, or by approaching slowly to see how the animals first respond. A few times I even seen hunters ram caribou with their machines.

Presently another proposal, Proposal 24, has been put forward to allow the shooting of calves in Unit 23—because of this "problem" of orphaned and abandoned calves wandering around dazed and wounded near where hunting has taken place. Poor hunting practices by hunters on snowmobiles are the cause of this. No one here disagrees with that. In my opinion, "fixing" this problem by proposing to make it legal to mercy shoot wounded calves is a ridiculous and roundabout and ultimately useless way of dealing with this issue.

The concept of "fair chase" has never fit with local culture. This makes sense. Here the culture was founded on getting food, and killing and bringing animals home has always been, and remains, the emphasis. Using everything at your disposal has long made the most sense here, too. Also, harvesting plenty of meat when one has the chance has always made sense on the large, and often soon very empty Arctic landscape. While much has changed here in the last 50



years—greatly increased air travel, flow of information, and astronomical increase in personal communication—those local foundational viewpoints concerning hunting have changed little.

Meanwhile, modern snowmobiles are not the machines they were in the 60's and 70's. These are rockets now, and they keep getting faster, more stable, and more reliable and with longer range. Also, a majority of hunters have switched to Mini-14's and AR-15s and other similar small-caliber fast-shooting rifles. These technologies both practically could have been designed for chasing and herd-shooting caribou—they are that perfect for this practice.

Unfortunately, this combination of new technologies is unquestionably detrimental to the Western Arctic Herd. And these factors keep growing worse.

These are some of the reasons for that:

Caribou are extremely stressed by these terrifying chases. A modern snowmobile chasing caribou is in no way equitable to a wolf or grizzly chasing animals as far as stress, energy expended, and damage to the herd. Snowmobiles get the whole group of animals running and chase them for countless miles—often returning day after day to do it again and again. At that point, even the distant sound of an unseen airplane or snowmobile engine gets those caribou again fleeing across the tundra. As a result, the caribou are more likely to be skinny and rundown. This further compounds the potential for waste--because if these caribou are ultimately harvested they then tend to be skinny, not fat and therefore locally valued much less, which leads the hunter to often seek another more desirable animal.

High-speed chasing and herd-shooting leads to many wounded caribou, many of which show no signs of taking a hit and just keep fleeing. Caribou that do limp or fall tend to be shot from the rear--while running flat out--and very often are hit in areas that ruin more meat: often the hindquarters, back and shoulders. Each animal is often shot multiple times. Winter caribou are smaller, thinner, lighter in weight, and in winter females are the most common target of local hunters. These females are much smaller than bulls—and often pregnant.

As a result, while high-speed chasing and herd-shooting can be considered fun, exciting, and may have higher “hunter success” and can appear to be quicker and more efficient, the actual per-animal poundage of harvested meat (when factoring in bullet-damaged meat, wounded animals, fetuses destroyed, and stress placed on the entire chased group) is far lower than when a hunter carefully shoots large bull caribou.

Locally, in winter the sex of caribou sought is almost exclusively adult pregnant females (because these are most likely to show back fat in winter). The practice of chasing, when hunting these pregnant females, greatly exacerbates the “cost” to the herd.

On a separate matter, I believe this practice of wounding and stressing many many caribou helps feed wolves, which leads to additional stress on the herd.



For these reasons, I believe high-speed chasing of caribou is not a good thing for the Western Arctic Herd. It is definitely not a necessary part of hunting or harvesting caribou meat. Hunting caribou is completely possible without chasing the hell out of them. Plenty of people know how. Every hunter here used to HAVE to know how! The growing practice of high-speed low-respect manner of hunting is not necessary, not respectful, and more importantly not good for caribou, or good for us.

Simply put, it has reached a point here in our region—much like the need for speed limits on highways—where some regulation is needed, and will be beneficial. We stand to improve from this change.

Presently the wording in Unit 23 regulations allows for “positioning” of caribou, but doesn’t define what positioning means. As a result, this in no way regulates the practice of chasing caribou with snowmobiles.

Locally, there is a growing discomfort and embarrassment with this practice. People know it used to be illegal, are surprised that it is not still, and recognize that it has gotten out of hand and is in danger of making local Native hunters look disrespectful--which is very much an unwanted thing here. This is a good time for the state to adjust regulations and do what’s best for both people and caribou.

I would like to be clear that my proposal, Proposal 23, is NOT intended to stop the use of snowmobiles for hunting caribou and bringing home meat. The proposal is simply seeking to limit the speed and proximity to the caribou of hunters using snowmobiles. This will help make us better hunters, more skilled, more respectful, and in a tangible way will help to sustain this herd that we very much love and need in our lives.

Thank you for your time and the work you do.

Sincerely,

Seth Kantner
PO Box 804
Kotzebue, Alaska 99752



KAWERAK, INC.



PC08
1 of 3

REPRESENTING

Brevig Mission

Sitaisaq

Council

Diomede

Iñaliq

Elim

Niviarcaurluq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Qawiaraq

Nome Eskimo

Sitnasuak Inuit

Savoonga

Sivungaq

Shaktolik

Saktuliq

Shishmaref

Qikiqtaq

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tala

Unalakleet

Unalaqtiq

Wales

Kinigin

White Mountain

Igaluik /

Nutchirviq

January 3, 2020

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Kawerak, Inc. is the regional non-profit tribal consortium of the Bering Strait Region. Kawerak's Board of Directors is comprised of the Presidents of the 20 tribes of the Bering Strait Region. Kawerak offers numerous programs and services to the 16 communities in the region. We offer the following recommendations to the Board of Game regarding proposals up for review in January 2020.

Kawerak, Inc. **SUPPORTS** the following proposals and offers comments following each proposal, for the Board of Game's consideration.

Proposal 1 - 5 AAC 85.025 & 5 AAC 85.045 Hunting seasons and bag limits for caribou & moose. Prohibit nonresident hunting of moose or caribou under intensive management in the Western Arctic/Western Region until harvest of population objectives are met. Kawerak supports this proposal because the intent is to prioritize people living in the Region and gives local residents an opportunity to hunt caribou or moose allowing food on the table and in the freezer, when bag limits are in place.

Proposal 3 - 5 AAC 92.015 Brown Bear tag fee exemptions, Reauthorize the current resident tag fee exemptions for Brown Bear in Units 18, 22, 23 and 26A. Kawerak supports this proposal; current bear population estimates show the population has grown and the hunt has been sustainable.

Proposal 30 - 5 AAC 92.001(k) Taking of game by proxy. This proposal allows a proxy hunt for Musk Oxen. Kawerak supports this proposal because individuals may be elderly, injured, had a family emergency and other situations that may not allow them to hunt. Allowing a proxy hunt could help that family obtain food resources.

Proposal 33 - 5 AAC 85.045 Hunting seasons and bag limits for moose. This proposal modifies hunting seasons and requires a registration permit for moose hunting in Unit 22D Remainder. Kawerak supports this proposal because the moose population in this area has declined. In the essence of conservation a registration and quota moose hunt would put a max limit on how many bulls could be taken out of this Game Management Unit.

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.



Proposal 35 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the availability of GMU 22 registration permits for moose hunting with an option to require a registration permit for the Unit 22D Remainder hunt as follows. Registration permits be available July 15-31, in Nome or Seward Peninsula/Norton Sound villages. We support this proposal so that local people on the Seward Peninsula & Eastern Norton Sound villages have the highest opportunity to receive available permits. Moose populations in several Units within 22 have declined in recent years.

Proposal 37 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Kawerak is in support of closing non-resident moose hunt in Unit 22C. Non-residents should have less opportunity since the moose population is in decline and the quota is so small. In recent years the hunt is only a couple days long.

Proposal 38 – 5 AAC 85.045 Hunting seasons and bag limits for moose. A proposal to modify the hunting season and bag limit for moose in Unit 22A. Kawerak supports this proposal because the change would allow for people living in Eastern Norton Sound more days to hunt without ADF&G having to do an emergency order opening.

Proposal 39 – 5 AAC 85.020 Hunting seasons and bag limits for brown bear & 5 AAC 92.132 Bag limit for brown bear. A proposal to extend the hunting season for brown bear in Unit 22D and 22E and increase the resident bag limit. We support the proposal with the following friendly amendment: We are neutral on the portion of this proposal to extend the season date into June due to the bears having poor hide quality as spring turns into summer. We support the portion of the proposal to harvest two (2) bear a year. The most recent bear population study has shown an increase in the bear population, current harvest is low and is sustainable.

Proposal 42 – 5 AAC 92.080 (4)(B)(i). Allow the use of snowmobiles to position brown bears for harvest in Unit 22. Kawerak supports this proposal; Snowmobiles have a long standing history in rural Alaska not only to position hunters to take game of all kinds but also necessary for day to day travel between villages.

Proposal 43 – 5 ACC 85.065 Hunting seasons and bag limits for small game. Kawerak support the change in hunt time, which allows for a better eating quality while recognizing a count of Alaska hares and sees a need to save them. Alaska Hares are generally twice as large as Snowshoe Hares and until hares can be quantified more accurately, it's better to reduce the Arctic Hare take.

Proposal 169 – 5 AAC 92.012 Licenses and Tags & 5 AAC 92.990. Clarify that big game tags be paid for and issued prior to hunters taking big game that requires tags. In the essence of fairness, specific hunts that require a locking tag should be mandatory for everyone not just Alaska residents. We support the proposal as written.

Kawerak, Inc. **DOES NOT SUPPORT** the following proposals and offers comments following each proposal, for the Board of Game's consideration.



Proposal 31 – 5 AAC 85.050 Hunting seasons and bag limits for muskoxen. Establish a registration permit hunt for muskoxen in Units 21D, 22A and 24D. Kawerak does not support the proposal as written. The last experience we had with a registration hunt for muskoxen was disastrous. It resulted in numerous hunters lining up on opening season and shooting all the bulls. There is no need to return back to a bad process. Keep the hunt in a controlled manner through Tier II.

Proposal 32 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. This proposal allows caribou to be taken east of and including the Nuluk River drainage in Unit 22E. Kawerak does not support this proposal, as there is still an active Reindeer Herd in Unit 22E so there is a very high probability that privately owned reindeer will be shot by hunters mistaking them for caribou. Opening Unit 22E east of and including the Nuluk River drainage may also diminish the Alaska State Troopers ability to enforce illegal take of reindeer due to the area being opened to caribou.

Proposal 34 – 5 AAC 85.045 Hunting seasons and bag limits for moose. This proposal opens a non-resident drawing hung in Unit 22D Remainder. We oppose this proposal as written. The recent moose population data shows this Unit has a declining moose population and it has been in decline for some time. Generally, registered outside hunters are going after bigger bulls; bigger bulls add tremendously to the breeding stock which in turn help increase the moose population.

Proposal 40 – 5 AAC 85.020 Hunting seasons and bag limits for brown bear. This proposal, requires a registration permit for brown bear in Unit 22C. We do not support this proposal as written. Current population data for bears on the Seward Peninsula including Unit 22C show an increase in the population. Bear harvest at the current rate is sustainable. ADF&G staff have indicated bear harvest reporting within Unit 22 is not an issue. If there is no problems with reporting of bears taken in a timely manner, changing to a registered hunt won't increase reporting.

Kawerak, Inc. **IS NEUTRAL** on the following proposals and offers comments following each proposal, for the Board of Game's consideration.

Proposal 2 – 5 AAC 92.115 Control of predation by bears. Establish intensive management programs for bear across the Western Arctic/Western Region.

Proposal 36 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting.

Proposal 41 – Hunting seasons and bag limits for brown bear. This proposal extends the season dates for brown bear in Unit 22B and 22C. We are neutral on lengthening the season dates for brown bear in either of these Units.

Sincerely,


Melanie Bahnke, President



Kobuk Valley National Park Subsistence Resource Commission

P.O. Box 1029
Kotzebue, AK 99752

January 3, 2020

ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Game members,

This letter explains comments made by the Kobuk Valley National Park Subsistence Resource Commission on the 2020 regulatory proposals to the State of Alaska Board of Game. The commission met on October 2nd and 3rd. Actions taken and comments from the members are reflected below.

Proposal 3: Shield Downey made a motion to support the proposal. Nellie Griest seconded the motion. The motion passed unanimously. In discussion, the commission encouraged bear hunting.

Proposal 19/20: No action. On the issue, Shield Downey and Glenn Miller offered the following comments:

Shield Downey: Due to the decline in the caribou in our unit you would think that it would make sense to have a closure on bull during the rut season because that's an opportune moment for the caribou to multiply. I think it's also a trophy thing for the sports hunters, and to have a year-long bull caribou season, personally I don't want the bulls killed off. It would deter the multiplying of caribou. I could see killing young bulls. The ones with the big racks are the producers. We have got to educate the people which ones is which. It's easy to tell a bull with the big rack, but the younger ones sometimes they mix up with the female. Young hunters that don't know what they're doing could kill the wrong caribou.

Glenn Miller: I would like to see the bull season opened up, because when those big bulls go in rut, you're smart enough you start picking the younger bulls. To take that pressure off the cows that have the young, I would prefer to open it up to young bulls, because that's what you should get. I'm not going to hunt the cows cause they produce young, I want be able to take the younger bulls who are not in that rut.

Proposal 21: Shield Downey made a motion to support the proposal. Glenn Miller seconded the motion. The motion passed unanimously. The commission agreed that 25 caribou annually would meet most people's needs, but stressed the importance of sharing caribou with those who are not able to hunt. Commission members said that they hunt for one another, but did not know about the process of getting a permit to proxy hunt. They had interest in making the proxy hunt easier by allowing tribal councils to give proxy permits.

Chairman: Shield Downey; Co-chair: Gordon Newlin Members: Glenn Miller, Benny Westlake, Nellie Griest, Rosa Horner, Murphy Custer, Enoch Mitchell



Kobuk Valley National Park Subsistence Resource Commission

P.O. Box 1029
Kotzebue, AK 99752

Proposal 22: No action. In discussion on this proposal, the commission was in favor of extending season for cow if there is a bag limit of 5 cow caribou annually.

Proposal 23: Shield Downey made a motion to support the proposal. Glenn Miller seconded the motion. The motion passed unanimously. The commission felt that the suggested restrictions were reasonable and that it was a follow up to the regulatory changes that were made in 2016 about using a snowmachine to position the hunter. Shield Downey commented that it would stop people from chasing caribou.

Proposal 24/25: Shield Downey made a motion to oppose the proposal. Glenn Miller seconded the motion. The motion passed unanimously. On this issue, Shield Downey said “Killing calves is not good, especially ones with mothers. You can identify, that’s a female with two calves or whatever. To have a season open for calves, that is not good. I’ve been a reindeer herder, I’ve hunted caribou and traditionally our people we do not hunt calves or kill calves intentionally.”

In closing, thank you for the opportunity to submit official comments on the 2020 State Proposals and thank you for your service to Alaskan subsistence.

Sincerely,
Shield Downey

Shield Downey, Chair
Kobuk Valley National Park Subsistence Resource Commission



RE: Proposal 169: Clarify that big game tags be paid for and issued prior to hunters taking big game that require tags.

I see this as an obvious support. Residents are expected to have their tags in order and we all thought nonresidents were too. So this needs to be corrected.



RE: PROPOSAL 33: Modify hunting seasons and require a registration permit for moose hunting in Unit 22D Remainder

File uploaded



I am in support of the recommended changes concerning the moose hunts to unit 22D remainder. However I would like to make a comment and addition for 22D remainder proposed moose hunt and that is to add an “October 10th -31st Bull moose hunt with spike fork or 50” plus antlers or 4 Brow Tines on at least one side and to have the season opened or closed at the discretion of Fish and Game dependent on moose population surveys and if the quota was filled”. Having it on the proposal we would not need to go to the Board to make changes later if the moose population rebounds and we get great numbers then we have the options to hunt in October. This is something like what they do with Cow moose hunts. They have the hunts available if there is a need for them and have used them in the past and this is at the discretion of Fish and Game and the advisory committees.

Comment that I have

1. The proposed hunt for 22D remainder is Aug -10-Sept 14 with a quota of 18-30 bulls. It has been mentioned that until fish and game can get an accurate count of the population of moose and the Bull to Cow ratio in the unit that the harvest level will be set at 18 bulls. Fish and Game is still trying to study the population and has mentioned that the unit can sustain a harvest level of 18-30 bulls per year. That is a pretty big number to not know. What if the population is better than they think, Also what if it's worse? Let's let them finish their studies to better understand the population before making life changing decisions for hunters in our region. Which is why I suggest having the October hunt added.
2. I would like to see a Second hunt if the quota is not filled from Oct 10th through October 30th with an antler restriction of spike fork or 50” wide antlers or greater and have 4 brow tines on at least one side. I am also very concerned that once the October hunt is gone it is most likely gone for a very long time and most likely forever
3. If the quota is still not met by October 31st I propose to have a 3rd opener starting January 1st for any antlered bull moose. With Permits only available in Teller and Brevig Mission. Like what they do in White Mountain and Golovin where permits for the 22B winter hunt are only available to get in those two communities. Meaning people who live in Nome must travel to those communities to get a permit.
4. We don't know how many hunters are hunting in this unit? All hunters in Nome usually get a regular Harvest Green tag just in case they travel to the area. For hunters that don't leave the region to hunt the only places to claim they hunted when filling them out at the end of the year is 22D remainder or 22E. So, they are claiming to have hunted in that area. Making this a registration hunt will help Fish and Game understand how many hunters are hunting the areas for the communities in the region
5. In my opinion and observation of the groups of hunters in 22D remainder all the hunters typically all have the Harvest Green Permit for hunting in 22D Remainder, but not all are actually looking to harvest. They have it just in case they get the opportunity to help in harvesting a moose for the group they are with or if they get stopped by AK state troopers there will be no questions that they are hunting or not. With my experience in this unit to travel out to these locations is a long way and typically hunters travel in groups of 3-4 just so they have enough room to harvest 1 maybe 2 moose.



6. I strongly feel that closing the October and not making in available to hunt in the future will put more pressure on 22B, 22C, 22D and 22E moose hunts. There are quite a few of us that wait until October to hunt. Closing the October moose hunt will force us to be more aggressive in hunting in Units 22B, 22C and 22D adding more pressure to the already low harvest levels in those units. If we were to harvest a bull in one of these units, we could possibly be taking from the people that don't have the means or ways to go way out into 22D remainder later in the year.

Sincerely,

Earl Merchant III

NATIVE VILLAGE OF MEKORYUK

Tribal Council

P.O. Box 66 • Mekoryuk, Alaska 99630
(907) 827-8828 • Fax: (907) 827-8133



PC12
1 of 1

October 28, 2019

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

Re: 5 AAC 85.050. Hunting seasons and bag limits for muskoxen.

The Native Village of Mekoryuk Tribal Council is making a special request to meet Nunivak Island Musk-ox hunt bag limits for the 2020 Winter Hunting season. This is important for local subsistence and outside hunters alike. A larger quota with the current season of February 1 to March 15 is simply not enough time with the climate change and an increase in the amount of winter storms over the past years. The Native Village of Mekoryuk Tribal Council and its tribal members are requesting an earlier start date, first week of January and a later end date, April 30 so that the quota set by Alaska Board of Game can be met.

The Alaska Department of Fish & Game suggests the following proposal set in the 2019-2020 hunting season and the Native Village of Mekoryuk Tribal Council agrees for a Musk-ox hunt extension on Nunivak Island.

“Extend the season for muskox on Nunivak Island. The population on Nunivak is over the management goal and the Department of Fish and Game needs to issue more permits to reduce the population. Almost all hunters on Nunivak Island use either a guide or transporter to hunt muskox. A longer season will increase the opportunity for hunters to use the limited commercial services on the Island. Transporters on Nunivak Island have reported being unable to meet hunter demand for transportation services with recent increases in permit availability and due to high demand during inconsistent weather windows that allow travel to the island.”

Thank You for your Time and Attention,

A handwritten signature in black ink, appearing to read 'Edward I. Kiokun'.

Edward I. Kiokun
President

PAST PRESIDENTS

Moses Nayiruk • Peter Smith, Sr. • Tom Dotomain • Jesse Moses • Walter Amos • George K. Whitman, Sr.
Edward J. Shavings, Sr. • George King, Sr. • Henry J. Shavings • Joseph David, Sr. • Jerry David, Sr.
Fred Don • Howard T. Amos • Samson Weston • Hultman Kiokun
Tom Amos • Solomon Williams • Daniel Olrun, Sr.



IN REPLY REFER TO:
10.A (AKRO-RNR) 20200101

United States Department of the Interior

National Park Service

Interior Region 11 · Alaska

240 W 5th Ave.

Anchorage, Alaska 99501

JAN 03 2020

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for the Western Arctic/Western Region being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS areas. We recognize and support the State's primary stewardship role in wildlife management, while ensuring that federal laws and regulations applicable to the NPS are upheld.

Proposal 2: NPS Recommendation: Oppose

This proposal would establish an intensive management program for brown and black bears in Units 18, 22, 23, and 26A. Under this program, the commissioner may authorize predator control under AS §10.05.020(2). Intensive management programs are authorized by non-hunting regulations and are not lawful on national preserves. If the Board adopts this proposal, NPS lands should be excluded from control efforts.

Proposal 23: NPS Recommendation: Support

The NPS supports the intent of this proposal restricting the use of snow machines to hunt caribou in Unit 23. If passed, this proposal would be better align state and federal regulations regarding snow machine use and would reduce harassment to caribou, which could likely have a cumulative, negative impact on individuals throughout the winter.

Proposal 27: NPS Recommendation: Opposed

This proposal would increase the nonresident bag limit from one bull caribou to two. Recent research suggests that the Central Arctic Herd has not exhibited a large increase in population size (approximately stable at 20,000 from 2016 to 2019), and the Western Arctic Herd has only exhibited one period of increase since the large decline from 2003 – 2016.

Proposal 32 – NPS Recommendation: Opposed

This proposal would allow the taking of caribou east of and including the Nuluk River drainage in Unit 22E. The boundary of this proposed hunt area would overlap the boundary of the last remaining reindeer grazing permit administered by Bering Land Bridge National Preserve. Reindeer from this herd can occasionally venture east of the Nuluk. The Wales herder has confirmed that a large number of his deer do not have ear tags. The herder has been detrimentally affected in the past by hunting take of reindeer that were mistaken for caribou.



Proposal 40: NPS Recommendation: Support

This proposal would require a registration permit for brown bear hunting for all residents in Unit 22C. The NPS supports the proposed permit requirement while park staff works with ADF&G to conduct a brown bear abundance survey in 2020. A registration permit will allow ADF&G to monitor hunting activity and in combination with survey results, will provide data necessary to guide appropriate management action.

Proposal 42: NPS Recommendation: Opposed

This proposal would allow use of snow machines to position brown bears for harvest in Unit 22. Federal regulations prohibit the taking and disturbing of wildlife by snow machines on NPS lands (§36 CFR 2.18(c)). This activity is counter to existing Federal Subsistence Board regulations (§50 CFR 100.26(b) (5)). If the Board adopts this proposal, users could be in violation of federal laws on Preserves and the NPS requests that the Board exempt NPS lands to avoid that possibility. An exemption indicated in the State hunting regulations would serve that purpose.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me or Mary Hake, Wildlife Biologist and liaison to the Board of Game at 907-644-3576.

Sincerely,

Debora Cooper
Associate Regional Director
National Park Service

cc: Doug Vincent-Lang, Acting Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Eddie Grasser, Director, Division of Wildlife Conservation, ADF&G
Steve Wackowski, Special Assistant to the Secretary for Alaska
Don Striker, Acting Regional Director, NPS
Greg Siekaniec, Regional Director, USFWS
Tom Doolittle, Deputy Assistant Regional Director, USFWS-Office of Subsistence Management
Greg Dudgeon, Superintendent, Gates of the Arctic National Park and Preserve
Jeanette Koelsch, Superintendent, Bering Land Bridge National Preserve
Maija Katak Lukin, Superintendent, Western Arctic Parklands

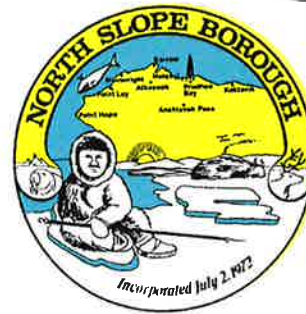


NORTH SLOPE BOROUGH

Department of Wildlife Management

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RAYNITA "TAQULIK" HEPA, DIRECTOR

20 November, 2019

Dear Chairman Spraker and Members of the Alaska Board of Game:

Please find attached a copy of "Subsistence harvest of caribou in eight North Slope villages, Alaska: 2014-2018". I am submitting this as support documentation for Proposal 28 and 78 submitted by the North Slope Advisory Committee to be discussed at the 2020 Arctic / Western Region meeting in Nome and the Interior / Northeast Arctic region BOG meeting in Fairbanks, respectively. As you may be aware our Department traveled to all communities on the North Slope to discuss registration permit and harvest ticket requirements for North Slope communities. At those meetings we listened to testimony that opposed those requirements and they overwhelmingly supported our Department's collection of that harvest information to be used to make informed management decisions. It is our hope that this document will help to demonstrate our commitment to collecting this important information. I look forward to testifying in the upcoming Board of Game meetings in January and March 2020.

Respectfully,

Brian Person
Senior Wildlife Biologist
NSB Department of Wildlife management
Brian.Person@north-slope.org



Subsistence Harvest of Caribou in Eight North Slope Villages, Alaska: 2014-2018

Brian T. Person, Carla Kayotuk, and Frances (JackyLou) Olemaun

North Slope Borough Department of Wildlife Management

P.O. Box 69, Barrow, AK 99723



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Subsistence harvest of caribou in eight North Slope villages, Alaska: 2014-2018

Overview:

The North Slope Borough Department of Wildlife Management (DWM) has collected subsistence harvest data on fish, birds, marine and terrestrial mammals, and plants utilized by residents of the North Slope beginning in the early 1990's. In some years this program has struggled to consistently collect and analyze these data in all communities due to various staffing, logistic, and financial set-backs. Beginning in 2014, the DWM has made a concerted effort to improve the consistent collection of caribou harvest data due to the decline of caribou populations on the North Slope. This report provides information on the methods used to collect and analyze caribou harvest data, discusses ways that we have tried to improve this program, and presents caribou harvest estimates for each North Slope community.

Methods:

The DWM attempted to conduct household caribou harvest surveys in all communities between 2014 and 2018 using the same survey instrument (Appendix A). In 2016 we slightly modified the survey instrument by adding 8 activity codes to facilitate data management. In 2015 the North Slope Borough Planning & Community Services Department collected data for an Economic Profile and Census Report in all North Slope communities. To avoid *survey fatigue* we requested that they include our survey instrument as part of the Census rather than having DWM staff conduct an independent survey. Similarly, in 2015 there were 3 independent surveys scheduled in most North Slope communities and we requested that Stephen R. Braund & Associates (SRB&A) collect household caribou harvest data on the DWM's behalf so as to avoid a 4th survey. Finally, as part of a stipulation to Conoco Phillips AK Alpine Satellite Development Project SRB&A was contracted to collect subsistence harvest data from the village of Nuiqsut. They agreed and collected household caribou harvest data using the DWM instrument between 2015 and 2018. DWM staff collected household harvest data from 2016 through 2018.

Caribou harvest data was collected at the household level for all surveys (*i.e.* if multiple hunters lived in the same household their harvest was combined into the reported household harvest). In most years data were collected using a one year recall- two exceptions to this exist. The 2017 data was collected using a two year recall for all communities except for Nuiqsut (NUI), Wainwright (AIN), and Kaktovik (KAK); and in 2015 through 2017 the communities of AIN and KAK data was collected using two six month recall surveys in each year.

In all communities other than Barrow (BRW) we attempted to conduct a census. Despite this, we worked off of a randomized household list because some of our visits to villages were only for a few days and we recognized that we might not be able to complete the census. We wanted to ensure that our choice of households to be interviewed was unbiased and therefore worked down the list of random households. In Barrow we also generated a random household list annually and we attempted to survey the first 300 households on that list (~ one-quarter of the total households).



Metrics:

Reported household harvest is the sum of male, female, and unknown sex (some respondents could not remember the number of bull or cows harvested) harvested caribou and reported during the interview. We estimated *community harvest* to be the ratio of the sum of reported household harvest divided by the number of households surveyed in each community multiplied by the total number of households in that community. We estimated the variation surrounding that estimate using methods by Cochran (1977) which are presented in Appendix B. We estimated the 95 % confidence interval (95 % CI) by multiplying the standard error by 1.96. We did not have the databases from the North Slope Borough Planning & Community Services Department's contractor or SRB&A therefore we cannot present 95% CI for those estimates. We estimated the *average household caribou harvest* to be the ratio of community harvest divided by the total number of households in that community. Our estimates of the *sex ratio* of the harvest are derived from the total number of males or females reported harvested divided by the sum of male and females reported harvested multiplied by 100. It is assumed that caribou reported with unknown sex were harvested at a similar ratio as the reported harvest.

We also collected information on the health of caribou harvested using standardized methods developed by CARMA, the general harvest location, and the month in which harvest occurred. We have yet to summarize that information.

Results and Discussion:

Community caribou harvest varied by community and year (Table 1). All communities harvest a fairly substantial number of caribou and its importance to the diet and culture of these largely Inupiat communities has been documented (Fuller and George 1997, Bacon et al. 2011, Braem 2017). Community caribou harvest was consistently highest in Barrow and Wainwright. Community harvest estimates for Point Lay in 2014 and 2015 were much higher than in 2016 through 2018 which could be attributed to the distribution of caribou being closer to the community in those years. Similarly, our 2017 estimate for Point Hope is high when compared to other years included in this report and reflects a favorable distribution of caribou near that community. Average household caribou harvest was consistently highest for the communities of Wainwright and Anaktuvuk Pass which underscores the importance of caribou to these communities (Table 2). Point Hope and Kaktovik tended to have the lowest average household harvest. Both of these communities have limited access to caribou when they are near the community. Kaktovik's best access is via snow machine in winter and caribou typically don't overwinter on the Coastal Plain in large numbers. Similarly, their access in the summer is limited via boat to coastal regions when caribou use the coast as insect relief for brief periods of the summer before moving back towards the mountains.

Our estimates of the sex ratio of caribou harvest are presented in Table 3. Bull caribou are the preferred harvest (Fuller and George 1997, Bacon et al. 2011). Our bull : cow harvest estimates don't necessarily reflect that preference. Atqasuk usually has caribou near the community year round and their bull : cow ratio reflects that they typically have the option to harvest bulls. Cow harvest is usually higher when caribou are only accessible during rut or in the few months post rut. Anaktuvuk Pass prefers to harvest



caribou in August and September if caribou migrate through their valley. Over the past decade caribou have only been accessible in large numbers in late October and November and in those months they have to rely on cow caribou. Our bull:cow ratios may reflect a change in caribou preference towards the harvest of cows, the lack of accessibility to bull caribou during the fall and early winter months, a decrease in the bull:cow ratio in the population, or a combination of these factors.

Moving Forward with our Harvest Documentation Program:

We have made a concerted effort to census caribou harvest in all 8 North Slope communities (Table 4). We are very grateful to SRB&A for their efforts to collect harvest information in Nuiqsut and in the coastal communities in 2015 for our Department. It is unfortunate that we failed to collect caribou harvest information in Anaktuvuk Pass in 2015 and 2018 and we intend to improve these efforts by hiring a Subsistence Research Assistant (see below) from that community and by traveling to AKP more often. We recognize that we surveyed a fairly low percentage of households in Barrow. Barrow is a large and culturally diverse community that has posed challenges to researchers in the past. One problem we encountered was that household participants were working when we attempted to interview them. Shifting our schedule to evenings and weekends helped somewhat but in the future we will try to interview participants at their work place.

We have made several improvements to our harvest documentation project and we will continue to find new ways to improve it while maintaining consistent data collection. We listened to suggestions from participants and have begun to provide communities with calendars which an increasing number of hunters use to document their harvest. This helps to improve harvest recall, thus data quality. We have created a database and continue to update it to facilitate data management, data quality, and data storage. We have changed the structure of the subsistence section of our Department and are attempting to fill Subsistence Research Assistant positions in more communities. We have not yet summarized harvest location data. This data exists in the format of Inupiat place names. Our plan is to work with focal hunters in each community to document those place names on maps (some already exist) and to translate those areas into a GIS format. Similarly, we have yet to summarize the data on the health and body condition of harvested caribou and intend to work on that in the near future. Finally, we are in the early stages of developing a program for our database that will summarize harvest data by sex and month.

**Table 1.** Estimated annual caribou harvest by community.

Estimated community harvest of caribou ($\pm 95\%$ CI)								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	951	1042	173	2860	248	358 ¹	212	951
2015 ²	756	----	----	3000	303	621 \pm 82	422	756
2016 ³	914 \pm 372	859 \pm 474	269 \pm 55	3246 \pm 1033	133 \pm 37	481 \pm 108	242 \pm 22	215 \pm 43
2017 ³	806 \pm 188	548 \pm 133	145 \pm 70	2636 \pm 1397	119 \pm 202	635 \pm 104	1282 \pm 243	290 \pm 74
2018 ³	1012 \pm 453	----	380 \pm 127	3829 \pm 1866	108 \pm 122	497	294 \pm 241	191 \pm 24

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was conducted during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**Table 2.** Average annual household caribou harvest by community.

Average household caribou harvest								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	6.2	9.7	2.7	2.4	3.1	2.9	1	12.7
2015 ²	4.9	----	----	2.5	3.8	5	2	10.1
2016 ³	5.9	8	4.1	2.7	1.7	1.7	1.1	2.9
2017 ³	5.2	5.1	2.2	2.2	1.5	5	6	3.9
2018 ³	6.6	----	5.8	3.2	1.4	4	1.4	2.5

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was conducted during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**Table 3.** Sex ratio of reported caribou harvest by community and year.

Sex ratio of reported harvest (% Bull : % Cow)								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	24 : 76	44 : 56	70 : 30	62 : 38	75 : 25	¹ 84 : 16	65 : 35	52 : 48
2015 ²	52 : 48	----	----	65 : 35	22 : 78	14 : 86	37 : 63	52 : 48
2016 ³	61 : 39	77 : 23	76 : 24	57 : 43	55 : 45	----	69 : 31	72 : 28
2017 ³	55 : 45	56 : 44	74 : 26	76 : 24	51 : 49	----	94 : 6	71 : 29
2018 ³	57 : 43	----	83 : 17	77 : 23	71 : 29	----	100 : 0	78 : 22

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was completed during the NSB 2015 NSB 2015 Economic Profile & Census

²survey was conducted by Stephan R. Braund & Associates (SRB&A).

³Survey completed by the NSB DWM

**Table 4.** Percent of total households surveyed in each community by year.

Percent of total households surveyed								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	50 %	48 %	42 %	15 %	26 %	¹ 45 %	22 %	75 %
2015 ²	59 %	----	----	65 %	67 %	81 %	76 %	82 %
2016 ³	47 %	36 %	68 %	21 %	76 %	83 %	88 %	79 %
2017 ³	79 %	58 %	52 %	10 %	83 %	79 %	39 %	63 %
2018 ³	52 %	0 %	52 %	8 %	64 %	----	35 %	88 %

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was completed during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM



Appendix A.

NSB DWM caribou harvest questions for JAN-DEC 20XX:

Village _____ Household ID _____ Interviewer _____

Date of Interview _____

1. Did you hunt caribou from January to December in 20XX? Yes _____ No _____

Activity Code _____ 1) Harvested 2) Attempted but no harvest 3) Did not attempt harvest
4) Out hunting 5) Out of town 6) Could not contact 7) Did not want
to be interviewed 8) Other

If Yes:

2. What month/s did you harvest them? Please write the number harvested and sex in each month:

Month	Bull	Cow	UNK	Month	Bull	Cow	UNK
Jan				Feb			
Mar				Apr			
May				Jun			
Jul				Aug			
Sep				Oct			
Nov				Dec			

3. How many did you harvest? Male _____ Female _____ UNK _____ Total _____

4. In general how would you assess the health of the caribou you harvested? _____

1. **Skinny** (no back fat, little or no gut or kidney fat).
2. **Not Bad** (little back fat, some gut or kidney fat).
3. **Fat** (nice layer back fat, plenty of gut or kidney fat).
4. **Very Fat** (thick layer back fat all the way up the back & fat inside).

5. General hunt location (kill site/s)



Appendix B.

Computing a total annual harvest estimate for a species and its standard error

Let y_{hi} represent the total number harvested by the i th sampled household in Stratum h . Then the sample mean number \bar{y}_h harvested in stratum h is given by Equation (1):

Equation (1)

$$\bar{y}_h = \frac{1}{n_h} \sum_{i=1}^{n_h} y_{hi},$$

and total annual harvest T is given by Equation (2):

Equation (2)

$$T = \sum_{h=1}^6 N_h \bar{y}_h.$$

with estimated variance $V(T)$ given by Equation (3):

Equation (3)

$$V(T) = \sum_{h=1}^6 N_h (N_h - n_h) s_h^2 / n_h$$

where s_h^2 , the sample variance in Stratum h , is given by Equation (4):

Equation (4)

$$s_h^2 = \frac{1}{n_h - 1} \sum_{i=1}^{n_h} (y_{hi} - \bar{y}_h)^2$$

so s_h is the sample standard deviation in the stratum. Note that s_h^2 cannot be computed if $n_h = 1$, i.e. only a single household in the stratum harvested the species.

The standard error SE of T is given by Equation (5):

Equation (5)

$$SE = \sqrt{V(T)}$$

with $V(T)$ given by Equation (3).



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IN REPLY REFER TO:

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

OSM 19096.PM

Mr. Ted Spraker, Chairman
ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 17-20, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Western Arctic/Western Region. We have reviewed the 43 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle,
Acting Assistant Regional Director

Enclosure



Chairman Spraker

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cc: Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Karen Deatherage, Council Coordinator, Office of Subsistence Management
Zachary Stevenson, Office of Subsistence Management
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Western Arctic/Western Region

January 17-20, 2020

Nome, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 7 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the opening date for the registration moose hunt, RM615 in Unit 18.

Current Federal Regulations:

Unit 18—Moose

Unit 18 – that portion east of a line running from the mouth of the Ishkowiak River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W 162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage—1 antlered bull by State registration permit; quotas will be announced annually by the Yukon Delta National Wildlife Refuge Manager

Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmaultauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP20-35 requests establishing a may-be-announced season between Dec. 1-Jan. 31. Wildlife Closure Review WCR20-38 analyzes the current closure to non-Federally qualified users and some Federally qualified subsistence users in the lower Kuskokwim hunt area.

Impact to Federal subsistence users/wildlife: As this hunt has a quota, which is usually met, no impact on the moose population is expected from this proposal. Federally qualified subsistence users could benefit from the season opening later in Zone 1 as cooler temperatures would facilitate proper meat care. They could still hunt on Federal public lands beginning Sept. 1. Desire for a later moose hunt due to warm weather in early September inhibiting proper meat care has been expressed at Yukon-Kuskokwim Delta Subsistence Regional Advisory Council meetings.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist for this proposal. It will increase harvest opportunity for Federally qualified subsistence users by providing a season when conditions better facilitate proper meat care.



PROPOSAL 8 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend resident season for moose hunting in Unit 18 Remainder.

Current Federal Regulations:

Unit 18—Moose

*Unit 18, remainder - 2 moose, only one of which may be antlered. Aug. 1-Apr. 30.
Antlered bulls may not be harvested from Oct. 1 through Nov. 30*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Extending the State season would likely result in additional harvest of moose. Given the high density of moose in this hunt area and the targeted harvest of cows, this population can withstand additional harvest. Additional harvest may help slow population growth and benefit long-term harvest and the moose population, which may be limited by density-dependent factors such as habitat.

Extending the State season to April 30 would align Federal and State regulations, decreasing regulatory complexity and user confusion. It would also increase harvest opportunity for Federally qualified subsistence users, who would no longer need to distinguish between State and Federal lands while hunting moose in Unit 18, remainder.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist given the high moose densities in this hunt area. Extending the season increases opportunity for Federally qualified subsistence users and aligns State and Federal seasons.

PROPOSAL 9 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the hunting season and bag limit for moose in Unit 18.

Current Federal Regulations:

Unit 18—Moose

*Unit 18--Goodnews River drainage and south to the Unit 18 boundary—1 Sep. 1 – 30
antlered bull by State registration permit*

Or



1 moose by State registration permit

A season may be announced between Dec. 1 and the last day of Feb.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: As this hunt has a quota, which is usually not met, minimal impact on the moose population is expected from this proposal. Lengthening the may-be-announced season to increase access may result in harvest meeting the quota, which would still be within sustainable levels. Lengthening the season to facilitate access due to inconsistent snow and weather conditions would increase harvest opportunity and likely harvest success for Federally qualified subsistence users. The proposed State season is a month longer than the current Federal season, precluding a Federal subsistence priority.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist and harvest opportunity for Federally qualified subsistence users would increase.

PROPOSAL 10 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 18.

Current Federal Regulations:

Unit 18—Moose

Unit 18—Goodnews River drainage and south to the Unit 18 boundary—1 antlered bull by State registration permit

Sep. 1 – 30

Or

1 moose by State registration permit

A season may be announced between Dec. 1 and the last day of Feb.

Unit 18, remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30

Aug. 1 – Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: Cow moose harvest is warranted in Unit 18 remainder due to high population density and signs that the population may be reaching carrying capacity and limited by density dependent factors such as habitat. A quota system prevents overharvest in the Goodnews River hunt area, although harvest during the winter season has historically been low. Allowance of cow moose harvest increases harvest opportunity for Federally qualified subsistence users and maintains alignment between State and Federal harvest limits. Changing the harvest limit to *Up to 2* moose provides management flexibility. However, if the Alaska Department of Fish and Game (ADF&G) changes the State harvest limit in-season, Federally qualified subsistence users would still be able to harvest two moose on Federal public lands under Federal regulations.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: No conservation concerns exist due to high moose densities and historically low harvests. Additionally, harvest is managed via a quota and delegated authority, which protects against overharvest. Reauthorizing antlerless moose harvest increases harvest opportunity for Federally qualified subsistence users.

PROPOSAL 14 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the bag limit for ptarmigan in Unit 18.

Current Federal Regulation:

Unit 18 – Ptarmigan (Rock and Willow)

15 per day, 30 in possession

Aug. 10–May 30

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in alignment of State and Federal regulations, which will decrease regulatory complexity, user confusion, and law enforcement concerns.

There are no current population surveys being conducted for ptarmigan in Unit 18. However, ADF&G staff observations near Bethel and Dillingham suggest that ptarmigan populations in this area may be much lower than in the past. Part of this decline is thought to be caused by warmer weather in the area and little or no snow in recent years, which would help to camouflage these birds and provide cover.

It is unknown what effect current harvest is having on the ptarmigan population in Unit 18. Although the general consensus of biologists in Unit 18 is that the ptarmigan population is declining due to climatic changes, it is uncertain what the cumulative effects caused by additional mortality due to harvest may be. It is possible that more than a 15% harvest may have additive impacts to the population. Without an estimate of ptarmigan populations in Unit 18, it is not possible to predict the impacts caused by current harvest levels.



Federal Position/Recommended Action: The OSM position is to **support** this proposal.

Rationale for comment: Local residents indicate that willow ptarmigan numbers are declining in Unit 18. Although it is expected that this decrease is likely caused by climatic changes impacting levels of natural predation over the last few years, human harvest could have an additive effect on the already declining population. It may be important to limit harvest until ptarmigan numbers rebound to maintain this resource for local users.

PROPOSAL 15 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Address customary and traditional use findings for Alaska hares in Unit 18 and modify the season and bag limits.

Current Federal Regulations:

Unit 18 – Hare

No limit.

July 1–June 30

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Although Proposal WP20-20 addresses Unit 9, the request is similar and the conservation concern for Arctic hare populations is the same throughout their range, which includes Units 18 and 22. Proposal WP20-30 requests that the hare season be shortened from year-round to Nov. 1-Jan. 31 and the harvest limit be reduced from no limit to 1 per day and 4 annually for Unit 9. OSM’s preliminary conclusion is replace the term “tundra” hare with “Arctic hare” and to support the shortened season and lower harvest limit. This change, if adopted by the Federal Subsistence Board (Board), would reduce regulatory complexity by aligning Federal regulation with the recently changed State regulation.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, there would be little to no impact on Federal qualified subsistence users but it would reduce hunting pressure on declining populations of Arctic hare (*Lepus othus*) in Unit 18. For the proposed changes to the State regulations to be more effective, similar regulations would be needed for Federal Subsistence regulations in Units 9, Unit 18, and Unit 22. Since Federal regulations currently do not distinguish between the two species of hares that occur in Alaska (snowshoe hare (*Lepus americanus*) and the Arctic hare (*Lepus othus*)), new regulations, specifically for the Arctic hare, would need to be developed.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Arctic hares were once abundant in Unit 18 and now occur at low densities. Although little is known about the Arctic hare populations in the Alaska Peninsula, the decrease may be related to habitat changes and/or predation. Reducing hunting pressure by lowering the harvest limits and shortening the harvest season will help address some conservation concerns for local populations of Arctic hares in Unit 18.



PROPOSAL 16 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the hunting season for brown bear from May 30 to June 30 in Unit 18.

Current Federal Regulation

Unit 18— Brown Bear

One bear by a State registration permit

Sep. 1 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: These changes may benefit Federally qualified subsistence users, who would be able to harvest a brown bear during an extended season under State regulations. However, this change would result in State regulations being more liberal than Federal regulations.

From 2012 to 2018 participation and success by local subsistence hunters was low. The harvest rate from 2012 to 2014 was approximately 6% of the estimated population, which is near the upper limit for brown bears. The harvest ratio was 70% male and 30% female, which is considered sustainable.

Federal Position/Recommended Action: The OSM recommendation is **neutral**.

Rationale: The proponent’s request includes the addition of a month to the end of the brown bear season. Brown bears are attracted to black bear bait stations, which close on June 30, and they could become more vulnerable if the brown bear season coincides with the end of the black bear baiting season. The current harvest rate is sustainable but near the upper limit for the species.

PROPOSAL 18 – 5 AAC 92.210. Game as animal food or bait. Allow the use of game bird wings and backs to be used for trapping bait in Unit 18 as follows:

Current Federal Regulations:

§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:

(i) The hide, skin, viscera, head, or bones of wildlife;

(ii) The skinned carcass of a furbearer;



(iii) Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;

(iv) Unclassified wildlife.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

PROPOSAL 19 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a year-round, resident season for caribou bull harvest in Unit 23.

Current Federal Regulations:

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 14

Feb. 1–June 30



Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14. July 15–Apr. 30

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14. July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposals WP20-43, WP20-45, and WP20-46 request the same changes as State Proposals 19 and 20.

Impact to Federal subsistence users/wildlife: Eliminating the bull closure would allow harvest of young bulls, which could reduce harvest pressure on cows, helping to grow the herd and increase harvest opportunity for Federally qualified subsistence users. As the timing of the fall caribou migration has changed in recent years, it would also provide more harvest flexibility by alleviating pressure on Federally qualified subsistence users to harvest caribou during a particular timeframe. While the risk of harvesting a bull in rut exists, Federally qualified subsistence users have been selectively harvesting bulls before the closure was adopted in 2016.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Adopting Proposal 19 increases harvest opportunity for Federally qualified subsistence users. Eliminating the bull closure may help grow the Western Arctic Caribou herd by reducing harvest pressure on cows.

PROPOSAL 20 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a year-round, resident season for caribou bull harvest in Unit 23.

See comments for Proposal 19.



PROPOSAL 21 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Reduce the bag limit for caribou in Unit 23.

Current Federal Regulations:

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 14

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.

July 15–Apr. 30

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.

July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While reducing cow caribou harvest could aid in the recovery of the Western Arctic herd, it is unclear how much effect this proposal would have on cow caribou conservation and herd recovery. Enforcement of this regulation would also be difficult.

Fall caribou harvest is critical in fulfilling subsistence needs in Unit 23. Currently, there is a bull closure from Oct. 15-Jan. 31. As caribou are migrating later in the year, subsistence users are shifting fall harvest



to coincide with when caribou are accessible from major rivers. Adopting Proposal 21 could result in subsistence users being unable to meet their needs if they are limited to only five caribou during the cow-only season when caribou are migrating through accessible areas.

The RC907 registration permit requirement was recently adopted in State and Federal regulations. Federally qualified subsistence users should have time to adjust to this permit requirement before additional permit restrictions are implemented.

Adopting this proposal would misalign Federal and State harvest limits for caribou in Unit 23. Federally qualified subsistence users would be able to harvest more than 25 caribou, including five cows on Federal public lands in Unit 23. However, a similar situation already exists in Unit 22. While State regulations limit caribou harvest to 20 caribou total in Unit 22, Federal regulations do not have an annual limit, so Federally qualified subsistence users could harvest more than 20 caribou on Federal public lands in Unit 22.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: This proposal would have limited conservation benefits to the Western Arctic herd and would burden Federally qualified subsistence users with additional regulatory requirements. State and Federal harvest limits would be misaligned if this proposal is adopted.

PROPOSAL 22 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Extend the season for taking cow caribou in Unit 23 Remainder.

Current Federal Regulations:

Unit 23—Caribou

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.

July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed



to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would increase cow harvest when pregnant cows are migrating to their calving grounds, potentially decreasing calf production and recruitment, as well as adult cow survival. While the herd may have stabilized or even increased, conservative management is still warranted, especially of cow caribou, whose survival has the biggest impact on herd trajectory and recovery. The bull caribou season is open during this time period, providing harvest opportunity.

This proposal would also result in Federal regulations being more restrictive than State regulations, precluding a Federal subsistence priority. While an extended State season would provide more harvest opportunity for Federally qualified subsistence users, misalignment of State and Federal caribou seasons could result in user confusion, especially in National Parks and the Federal public lands closure around Noatak where only Federal regulations apply.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Conservative management of the Western Arctic herd is warranted given its recent decline and lack of recent population estimates. Cow caribou survival has the greatest impact on herd conservation and trajectory. While this proposal would increase harvest opportunity for Federally qualified subsistence users, the bull season is currently open during this time period. Adopting this proposal would also misalign State and Federal seasons.

PROPOSAL 25 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Remove the restriction on caribou calf harvest in Unit 23.

See comments for Proposal 24.

PROPOSAL 28 – 5 AAC 85.025(g). Hunting seasons and bag limits for caribou. Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope resident hunters.

Current Federal Regulation:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports



(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: According to the proponent, the Department of Wildlife Management (DWM) travelled to all the North Slope communities and the residents overwhelmingly supported the collection of harvest data by DWM rather than by the use of State harvest ticket or registration permits. In addition, the information collected from RC907 duplicates information required by the North Slope Borough Department of Wildlife Management.

To assess the impact of harvest on Western Arctic, Teshekpuk, and Central Arctic caribou populations, accurate harvest information on location, date of harvest, and sex is needed. Detailed harvest information has not been readily available from the DWM in recent years. Accurate harvest information is critical to the proper management of caribou populations in this region.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Harvest reports are an important management tool that provides valuable information to aid caribou population management decisions. To address the effects of hunting pressure and changes to State and Federal regulations on North Slope caribou populations, accurate harvest information on location, number, date of harvest, and sex is needed. To date, detailed harvest data has not been available.

PROPOSAL 29 – 5 AAC 85.045(11). Hunting seasons and bag limits for brown bear.

5 AAC 92.132. Bag limit for brown bears. Increase the resident bag limit for brown bears in Unit 26A.

Current Federal Regulations:

Unit 13—Brown Bear

Unit 26A—1 bear by State subsistence registration permit only.

July 1-June 20.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

In 2014, the brown bear population in Unit 26A appeared to be stable to increasing. However, there have been no density estimates or information on brown bear population trends since 2014. From 2000-2013, an average of 23-30 brown bears were take annually in Unit 26A. This includes an estimated 6-12 bears



that are not reported each year. As of 2014, ADF&G believes that this level of harvest was sustainable based on density estimates.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest brown bear in Unit 26A. However, updated population information on this species is recommended before the harvest limit is increased to two bears every regulatory year.

PROPOSAL 31 – 5 AAC 85.050. Hunting seasons and bag limits for muskoxen. Establish a registration permit hunt for muskoxen in Units 21D, 22A, and 24D.

Current Federal Regulation:

Unit 21D – Muskox	<i>No Federal Open Season</i>
Unit 22A – Muskox	<i>No Federal Open Season</i>
Unit 24D – Muskox	<i>No Federal Open Season</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Muskox were reintroduced to Units 22C and 22D of the Seward Peninsula in 1970, and have since expanded their range to the north and east. Currently, muskox occupy suitable habitat in Units 22A, 22B West, 22C, 22D, 22E, and 23-Southwest. Limited harvest of this population is permitted in Units 22B, 22C, 22D, 22E, and 23 under either State or Federal regulations. A majority of the Federal public lands in these areas are closed to the taking of muskox except by Federally qualified subsistence users, due to the low muskox population in the region.

Although the muskox population experienced periods of growth between 1970 and 2010, the Seward Peninsula muskox population began to decline in 2010. Between 2010 and 2012 the muskox population declined 12.5% annually throughout the Seward Peninsula. Recent research suggested that selective harvest of mature bulls on the Seward Peninsula could be a driver of reduced population growth and that



annual harvest be restricted to less than 10% of the estimated number of mature bulls. Following this change in harvest strategy, the Seward Peninsula muskox population remained stable through 2017, but populations still remain lower than in the past. Increasing harvest of this population could lead to another decline in the overall population of muskox in this region.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: In addition to direct mortality due to harvest, muskox survival could be susceptible to herd disturbances during winter months if caloric expenditures are too high. Harvest on the Seward Peninsula was reevaluated and reduced in 2012 due to a declining muskox population. Recently, some localized populations have experienced a slight increase or have remained stable, but they still remain at much lower numbers than in the past. Current harvest strategies should remain in place to ensure that these muskox populations have the opportunity to reach healthy levels.

PROPOSAL 32 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E.

Current Federal Regulations:

Unit 22E—Caribou

<i>Units 22A—that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E—that portion east of and including the Tin Creek drainage—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30</i>
<i>Units 22C, 22D remainder, 22E remainder—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30, season may be announced</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase harvest opportunity for Federally qualified subsistence users hunting between the Sanaguich and Nuluk River drainages. Federal and State hunt areas in Unit 22E are currently misaligned and would remain misaligned if this proposal is adopted. Federal regulations would become slightly more restrictive than State regulations since the season for the area between the Tin Creek and Nuluk River drainages would still be may-be-announced under Federal regulations. However, Federally qualified subsistence users would still be able to harvest caribou on Federal public lands in this area under State regulations. No conservation concerns exist for this proposal as the primary reason western Unit 22E has a may-be-announced caribou season is to protect reindeer.



Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: There are no conservation concerns for this proposal, and it would increase harvest opportunity for Federally qualified subsistence users. State and Federal hunt area boundaries are currently misaligned and would remain misaligned if this proposal is adopted.

PROPOSAL 33 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify hunting seasons and require a registration permit for moose hunting in Unit 22D Remainder.

Current Federal Regulation:

Unit 22D – Moose

<i>Unit 22D remainder—1 bull</i>	<i>Aug. 10–Sept. 14</i>
	<i>Oct. 1–Nov. 30</i>
<i>Unit 22D remainder—1 moose; however, no person may take a calf or a cow accompanied by a calf</i>	<i>Dec. 1–31</i>
<i>Unit 22D remainder—1 antlered bull</i>	<i>Jan. 1–31</i>

Is a similar issue being addressed by the Federal Subsistence Board? Yes

Impact to Federal subsistence users/wildlife: This proposal would mostly align with Proposal WP20-38 that was submitted to the Board and will be considered at the Board’s April 2020 meeting.

The moose population in Unit 22D remainder is currently below State management goals and has been declining at a rate of 14% annually since 2011. The current estimated annual harvest may be above sustainable levels. Due to the declining population, the State removed antlerless hunts from their regulations in Unit 22 and eliminated non-resident harvest opportunity in the area. Requiring a registration permit will help to obtain more accurate harvest data, which is necessary to properly manage the species.

Fall composition surveys indicate a negative change in the composition within Unit 22D remainder. Results from 2016 and 2018 surveys showed a bull:cow ratio of 23 and 18 bulls:100 cows, respectively, both of which are below the State management objective of 30 bulls: 100 cows. Due to the vulnerability of rutting bulls, the removal of the October and November season may be beneficial to the stabilization of this moose population.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: If this proposal is adopted, it would limit subsistence opportunity for Federally qualified subsistence users in Unit 22D remainder, but it would also help to ensure that users have the



moose resource available for future generations. Requiring a registration permit would put more of a burden on users, but it would provide more accurate tracking of moose harvest in the hunt area.

PROPOSAL 35 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting with an option to require a registration permit for the Unit 22D Remainder hunt.

Current Federal Regulation:

Unit 22 – Moose

Unit 22A—that portion north of and including the Tagoomenik and Shaktoolik River drainages—1 bull. Federal public lands are closed to hunting except by federally qualified users hunting under these regulations Aug. 1–Sep. 30.

Unit 22A—that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of the Tagoomenik and Shaktoolik River drainages—Federal public lands are closed to the taking of moose, except that residents of Unalakleet, hunting under these regulations, may take 1 bull by Federal registration permit, administered by the BLM Anchorage Field Office with the authority to close the season in consultation with ADF&G Aug. 15–Sep. 14.

Unit 22A, remainder—1 bull. However, during the period Jan.1-Feb. 15, only an antlered bull may be taken. Federal public lands are closed to the taking of moose except by federally qualified subsistence users Aug. 1–Sep. 30.
Jan. 1–Feb. 15.

Unit 22B—west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations Sep. 1–14.

Unit 22B—west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS, and ADF&G. Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations Jan. 1–31.

Unit 22B, remainder—1 bull Aug. 1–Jan. 31.



Unit 22C—1 antlered bull Sep. 1–14.

Unit 22D—that portion within the Kougarok, Kuzitrin, and Pilgrim River drainages—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by residents of Units 22D and 22C hunting under these regulations Sep. 1–14.

Unit 22D—that portion west of the Tisuk River drainage and Canyon Creek—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G Sep. 1–14.

Unit 22D—that portion west of the Tisuk River drainage and Canyon Creek—1 bull by Federal registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by residents of Units 22D and 22C hunting under these regulations Dec. 1–31.

Unit 22D, remainder—1 bull Aug. 10–Sep. 14.
Oct. 1–Nov. 30.

Unit 22D, remainder—1 moose; however, no person may take a calf or a cow accompanied by a calf Dec. 1–31.

Unit 22D, remainder—1 antlered bull Jan. 1–31.

Unit 22E—1 antlered bull. Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations Aug. 1–Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in local priority for users residing within Unit 22, by making nonlocal users travel to the region in July to obtain their permits.

Federal public lands in many portions of Unit 22 are currently closed to the harvest of moose except by Federally qualified subsistence users, due to low moose populations throughout the region. This proposal would increase opportunity for local users, by limiting competition near villages. This proposal may also decrease overall harvest, thus allowing the moose populations to increase and protecting this important resource into the future.



Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: Moose populations are low in many portions of Unit 22. This proposal would provide increased opportunity for local Federally qualified subsistence users throughout Unit 22 by limiting competition with non-local users.

PROPOSAL 36 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting.

See comments for Proposal 35.

PROPOSAL 41 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the season dates for brown bear hunting in Unit 22B and 22C.

Current Federal Regulation:

Unit 22 – Brown Bear

Unit 22B—2 bears by State registration permit only. Aug. 1–May 31

*Unit 22C—1 bear by State registration permit only. Aug. 1–Oct. 31
Apr. 1–May 31*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations and registration permit seasons, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Although there are no current population estimates for the area, the current brown bear population appears to be healthy and productive. Current harvest levels within Units 22C and 22B are currently within State management goals.

Although harvest in Unit 22C increased by 87% from 2014 to 2015 with a previous liberalization of regulations, the population appears to be healthy throughout the unit. Federal public lands make up a negligible fraction of the total land area of Unit 22C, so the proposed regulation is unlikely to impact Federally qualified subsistence users hunting on Federal public lands. This proposal could, however, provide local users with an increased opportunity to harvest brown bear on State managed lands under State regulations.

This proposal would allow for harvest of brown bear during the time of year when these animals have used the majority of their winter fat reserves. Brown bears are rarely hunted by locals during this time of year when the bears are considered lean and their hides are of lesser quality. Therefore, this would not be a time of year when brown bears are typically harvested for subsistence purposes.



Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale for comment: If this proposal is adopted, it would misalign State and Federal regulations which could lead to user confusion in the area. This proposal would also extend the harvest season into a time of year when Federally qualified subsistence users do not typically harvest brown bear for subsistence uses, however it could still provide additional opportunity for users if needed.

PROPOSAL 43 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Address customary and traditional use findings for Alaska hares in Unit 22 and modify the season and bag limits.

See Proposal 15.



From: [Peter Evon](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Cc: [Mary Matthias](#); [Denise Kinegak](#)
Subject: Board of Game Comments - Western Arctic/Western Region Proposal 1
Date: Friday, January 3, 2020 9:47:00 AM
Attachments: [ONC Comment - Proposal 1 Mulchatna Herd Closure.pdf](#)

Hello,

I have attached the comments being submitted by Orutsararmiut Native Council for the Western Arctic/Western Region meetings. The information is as follows:

Name: Peter Evon
Organization: Orutsararmiut Native Council (Bethel)
Email Address: pevon@nativecouncil.org
Position: Support
Comment: Please see attached file.

Please let me know if you have any questions or need any additional information. I have also submitted these comments on the Board of Game website as well. Thank you.

--

Peter Evon,
Executive Director
Orutsararmiut Native Council (ONC)
ph: 907-543-2608
email: pevon@nativecouncil.org





U.S. Fish and Wildlife Service

Contact: Kenton Moos
(907) 842-1063 or 1-800-817-2538
kenton_moos@fws.gov

For Immediate Release:
December 26, 2019

MULCHATNA CARIBOU SEASONS CLOSED ON FEDERAL PUBLIC LANDS THROUGHOUT RANGE OF THE MULCHATNA CARIBOU HERD

The Togiak National Wildlife Refuge Manager, under authority delegated by the Federal Subsistence Board, will close caribou hunting at 11:59 pm on December 31, 2019 on Federal public lands to all hunters under Registration Permit RC503 in the following areas:

Units 9A, 9B, that portion of Unit 9C draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek, all drainages west of Right Hand Point in Unit 17A, 17B, 17C east of the east banks of the Wood River, Lake Aleknagik, Agulowak River, Lake Nerka, and the Agulupak River, 18, 19A, and 19B.

This closure does not affect caribou hunters under Registration Permit RC501 in Unit 17A east of Right Hand Point or in Unit 17C west of the east banks of the Wood River, Lake Aleknagik, Agulowak River, Lake Nerka, and the Agulupak River, or caribou hunters under FC1702 in that portion of Unit 17A and 17C consisting of the Nushagak Peninsula south of the Igushik River, Tuklung River and Tuklung Hills, west to Tvativak Bay.

Justification:

The summer 2019 population estimate of the Mulchatna Caribou Herd was approximately 13,500, which is about half of the estimated herd size from the previous five years. This population estimate is well below the Alaska Department of Fish and Game's minimum population objective of 30,000. As a result of this decline, the Federal Subsistence Board reduced the bag limit from two to one caribou, restricted the harvest to bulls only in Units 18, 19A and 19B, and delegated in-season management authority to the Togiak Refuge Manager. Since receiving management authority, the Togiak Refuge staff, working with staff from the Alaska Department of Fish and Game, determined there is no harvestable surplus that would allow herd growth. As of December 16, 2019, 79 caribou have been reported harvested and an additional 7 caribou were known harvested but not reported. Thus, in the interest of allowing herd recovery, no additional harvest is warranted. The federal in-season manager consulted with and has concurrence from affected Federal Subsistence Regional Advisory Councils and other federal land managers.

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Orutsararmiut Native Council is in full support of the closure of the Mulchatna Caribou Herd on Federal Public Lands throughout the range of the MCH and is requesting the Alaska Board of Game support the closure of the Mulchatna Caribou Season on state public lands throughout the range of the Mulchatna Caribou Herd. If the state doesn't enact in going into conservation and preservation mode for all units/portions on State lands for the protection of the Mulchatna Caribou Herd, we believe this herd will be wiped out to extinction. There was a report about law enforcement who went out to monitor the Mulchatna Caribou Herd, they found a lot of dead caribou, shot, reporting's of unreported harvests, illegal poaching, in compliant of laws and regulations, and determined that this herd cannot survive.

We are asking the AK Board of Game to follow its Laws and Regulations Annotated:

Chapter 20 Protection of Fish and Game; Refuges, Sanctuaries, Range Areas, and Habitat Areas.

Article 1. State Game Refuges (16.20.010 – 16.20.080)

Sec. 16.20.020.

Sec. 16.20.075.

Article 3. Endangered Species (16.20.180 – 16.20.210)

Article 3. Endangered Species. Section 180., 185., 190.

Sec. 16.20.180. Declaration of purpose

Sec. 16.20.185. Protection of habitat

Sec. 16.20.190. Determining endangered species

Justification:

The summer of 2019 population estimate of the Mulchatna Caribou Herd was approximately 13,500, which is about the half of the estimated herd size from the previous five years. This population estimate is well below the Alaska Department of Fish and Games minimum population objective of 30,000. The Federal Subsistence Board reduced the bag limit from two to one caribou, restricted the harvest to bulls only in Units 18, 19A and 19B, and delegated in-season management authority to the Togiak Refuge Manager.

Alaska Fish and Game Laws and Regulations Annotated 2018-2019

Chapter 20 Protection of Fish and Game; Refuges, Sanctuaries, Range Areas, and Habitat Areas.

Article 1. State Game Refuges (16.20.010 – 16.20.080)

Sec. 16.20.020. Purpose. The purpose of AS 16.20.010 – 16.20.080 is to protect and preserve the natural habitat and game populations in certain designated areas of the state. (1 ch 114 SLA 1960)

Sec. 16.20.075. Regulations. The board shall, under AS 16.05, adopt regulations governing the taking of game on state game refuges it considers advisable for conservation and protection purposes.



Article 3. Endangered Species (16.20.180 – 16.20.210)

Article 3. Endangered Species. Section 180., 185., 190.

Sec. 16.20.180. Declaration of purpose. The legislature recognizes that, due to growth and development, certain species or subspecies of fish and wildlife are now and may in the future be threatened with extinction. The purpose of AS 16.20.180 – 16.20.210 is to establish a program for their continued conservation, protection, restoration, and propagation. (1 ch 115 SLA 1971)

Sec. 16.20.185. Protection of habitat. On land under their respective jurisdictions, the commissioner of fish and game and the commissioner of natural resources shall take measures to preserve the natural habitat of species or subspecies of fish and wildlife that are recognized as threatened with extinction.

Sec. 16.20.190. Determining endangered species. (a) A species or subspecies of fish or wildlife is considered endangered when the commissioner of fish and game determines that its numbers have decreased to such an extent as to indicate that its continued existence is threatened. In making this determination the commissioner of fish and game shall consider

- (1) The destruction, drastic modification, or severe curtailment of its habitat;
- (2) Its overutilization for commercial or sporting purposes;
- (3) The effect on it of disease or predation;
- (4) Other natural or man-made factors affecting its continued existence.

(b) after making a determination under (a) of this section, the commissioner of fish and game shall, in accordance with AS 44.62 (Administrative Procedure Act), publish a list of species or subspecies of fish and wildlife that are endangered. The commissioner shall, at least once every two years thereafter, conduct a thorough review of the list to determine what changes have occurred concerning the species or subspecies listed. Consideration of existing species or subspecies of fish and wildlife for listing under this section shall be made on a continuing basis. The review of listed species or subspecies conducted under this section shall be submitted in writing to the governor and the legislature and shall be made available to the public.

(c) in making the determination and review under (a) and (b) of this section, the commissioner of fish and game shall seek the advice and recommendation of interested persons and organizations, including but not limited to ornithologists, ichthyologists, ecologists, and zoologists. (1 ch 115 SLA 1971)

Sec. 16.20.195. Permit of taking endangered species.

A species of subspecies of fish and wildlife listed as endangered under AS 16.20.190 (b) may not be harvested, captured, or propagated except under the terms of a special permit issued by the commissioner of fish and game for scientific or educational purposes, or for propagation in captivity for the purpose of preservation. (1 ch 115 SLA 1971)



RE: PROPOSAL 40: Require a registration permit for brown bear hunting in Unit 22C

There has been a dramatic increase in brown bear harvest in Unit 22C since the hunting season was lengthened to include the month of April, allowing Nome's avid bear hunters to easily access bears by snowmachine. Since this regulation went into affect in RY2017, I have observed very few bears in the areas I frequent in Unit 22C compared to my prior 22 years of living in Nome. We have not seen a single bear from our home in Banner Creek since the lengthened season was implemented, after enjoying bear watching from our home every previous summer. During my extensive backpacking and hiking trips in the Kigluaik Mountains and ridges of Unit 22C, not only have I seen few bears (compared to previous years), I have noticed markedly less sign of bears using the country (tracks, scat, diggings, hair in rub rocks) than previously accustomed to. I enjoy sharing the country with bears and their apparent diminished presence is disturbing to me. I support providing ample opportunity to hunt bears, but without population data, I believe harvest should be managed conservatively and carefully and that a registration hunt will give the Department the tools it needs to manage this resource responsibly while still providing flexibility to hunt when conditions are good. I support setting a harvest quota to maintain harvest at levels prior to RY2017. It is important to me that Fish and Game demonstrates to the public that bears are a valued part of our ecosystem by managing harvest with the same thoughtful care used when regulating harvest of game species.



Reindeer Herders Association

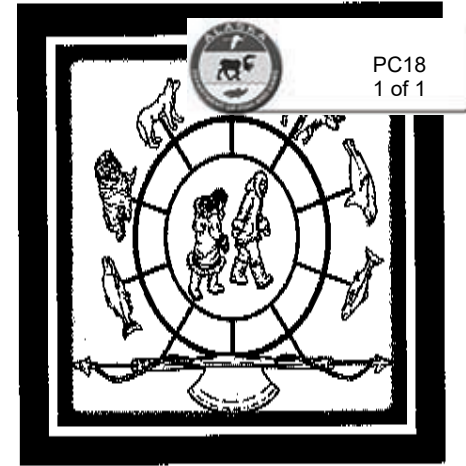
Kawerak, Inc

PO Box 948

Nome, Alaska 99762

(907) 443-4378 PH

(907) 443-4458 FX



PC18
1 of 1

January 2, 2019

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Reindeer Herders Association opposes the following Board of Game proposal.

Proposal 32 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E. There is still an active Reindeer Herd within Unit 22E so there is a very high probability that privately owned reindeer will be shot by non-resident hunters. Opening Unit 22E east of and including the Nuluk River drainage may also diminish the Alaska State Troopers ability to enforce illegal take of reindeer due to the area being opened to caribou.

Fish & Game has the option to open this area by executive order, but has not used this tool in previous years. The Western Arctic Caribou Herd does not make it on the Seward Peninsula until late October/November.

Reindeer Herders Association President – Tom Gray



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

**Comments to Alaska Board of Game
Region V Arctic/Northwest Region - Nome
January 17 – 20, 2020**

Proposals we support: 1, 5 (support as amended), 8, 9, 16, 19, 20, 33, 38, 169

Proposals we oppose: 27, 28, 29, 34, 37

**Proposal 1 – 5AAC 85.025 Hunting seasons and bag limits for caribou
5AAC 85.045 Hunting seasons and bag limits for moose**

Nonresident hunting shall not be allowed in Region V (Western/Arctic Region) for any moose or caribou population under a current active Intensive Management (IM) Predation Control Program designed to help feed Alaskans until the minimum IM population or harvest objective for that population has been reached.

SUPPORT

This is a RHAK proposal we believe is consistent with the intent of Intensive Management (IM) Law and consistent with the board’s past opinions.

Case in point: the board passed a proposal to allow limited nonresident hunting of the Nelchina caribou herd, which is an IM listed caribou population thousands of Alaskans depend upon for food, stating that nonresident hunting will only be allowed when the herd is within IM objectives. Every moose and caribou herd in the state listed as an IM population with specific objectives should fall under this same guideline, regardless if there is an Active IM predation control program in place.

According to our Intensive Management law, the highest and best use of certain prey populations is for human consumption by Alaskans, and Alaskans are given a priority to these populations. When those populations are under the population or IM objective, no nonresident hunting should be allowed.

Proposal 5 – 5AAC 85.050 Hunting seasons and bag limits for muskoxen

SUPPORT as Amended

This is a Department proposal asking for a longer muskox season on Nunivak Island for both residents and nonresidents, based on the population being over the management goal.



The Department already has discretionary authority to issue up to 110 permits for this hunt, and in recent years has been increasing the number of permits awarded to up to 60+ permits for the winter hunt (DX 003), but in doing so has equally allocated between residents and nonresidents.

Any draw hunt means there aren't enough animals to provide opportunity for all and RHAK firmly believes that all drawing hunts should be allocated 90 percent to residents and 10 percent to nonresidents.

This is a unique hunt in that residents pay a \$500 tag fee and utilize the same transporter and other services as nonresidents. Nonresident U.S. citizens are not required to hire a guide to hunt muskox. Nonresident hunters already have plenty of opportunity to hunt muskox on Nunivak Island and to bring in revenue to the Department and transporters on the Island.

We support extending the fall and winter seasons, but for **residents only**. We also suggest giving the Department additional allocation authority beyond the 110 currently in regulation.

Unit 18 Nunivak Island	Residents	Nonresidents
1 bull by drawing permit only	Aug. 1 [SEPT. 1] – Sept. 30	Sept. 1 – Sept. 30
Up to XXX permits may be issued	Jan. 15 [FEB. 1] – March 31 [15]	Feb. 1 – March 15

Proposal 8 – 5AAC 85.045 Hunting seasons and bag limits for moose

Extend resident season for moose hunting in Unit 18 Remainder

SUPPORT

We support allowing more resident opportunity where it is sustainable, and the Department has no conservation concerns for this population. We also support allowing hunters longer weather windows to get out into the field.

Proposal 9 – 5AAC 85.045 Hunting seasons and bag limits for moose

Modify the hunting season and bag limit for moose in Unit 18

SUPPORT

This is a Department proposal and we fully support more resident hunting opportunity and extending seasons so that hunters can take advantage of weather windows and snow conditions to get out into the field

Proposal 16 – 5AAC 85.020 Hunting seasons and bag limits for brown bear

Extend brown bear season

SUPPORT



RHAK supports more bear hunting opportunity where it is sustainable, and the Department has no conservation concerns regarding this proposal. Aligning the black and brown bear baiting seasons as this proposal would do also has our support.

Proposal 19 & 20 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Open a year-round, resident season for caribou bull harvest in Unit 23

SUPPORT

These two proposals are identical, and RHAK understands the enormous amount of time and work the Kotzebue Sound AC and Western Arctic Caribou Herd Working Group puts in on understanding these issues. We support allowing more resident opportunity to harvest bulls, as long as hunters are aware that taking mature bulls in October/November/December is typically not a good idea as the meat is inedible due to the rut. According to the Department, if this proposal is adopted, it could lead to a reallocation of harvests that could have a positive influence on the trajectory of the herd.

Proposal 27 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Increase nonresident bag limit for caribou in Unit 26

OPPOSE

This proposal is also before the board at the Region III 2020 meeting as Proposal 81, and as it refers to the Central Arctic Herd primarily within Region III, we expect the board to defer it to that meeting. We will also defer our extensive comments on Proposal 81 to the Region III meeting in March 2020.

Bottom line: ***Allocating more caribou to nonresident hunters is the exact opposite of what the board should do. See RHAK Proposal 80 before the board at the Region III March 2020 meeting.***

Proposal 28 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Eliminate the RC 907 caribou registration permit and general season caribou harvest ticket requirement for North Slope residents

OPPOSE

Prudent wildlife management and conservation involves cooperation among hunters in informing the Department of Fish & Game of our harvests. That information, along with survey and inventory data, helps determine seasons and bag limits. Without that data, the Department must manage more conservatively.

**Proposal 169 – 5AAC 92.012 Licenses and tags
5AAC 92.990 Definitions**



Big game tags must be paid for and issued prior to hunters taking big game that requires tags

SUPPORT

This is an Alaska Wildlife Trooper proposal clarifying that nonresidents and nonresident aliens must comply with the same locking tag requirements as residents, and previously purchase locking tags prior to hunting. We fully support it.

Thank you to Board of Game members for your service, and as always thank you to Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)
www.residenthuntersofalaska.org
info@residenthuntersofalaska.org



12/31/2019 10:32 PM AKST

RE: PROPOSAL 40: Require a registration permit for brown bear hunting in Unit 22C

I support Proposal 40 requiring a registration hunt for brown bear hunting in Unit 22C. I have lived 12 miles north of Nome for 24 years and am concerned about the apparent lack of brown bears in the area during the past two years after the expansion of the hunting season to April 1 - May 31. Prior to the season expansion every year I would see bears in the distance from my house with some regularity every spring, summer and fall, now I seldom see bears or encounter signs of their presence. This proposal allows the Department of Fish & Game to evaluate and monitor harvest, and take necessary management action, while still allowing hunting opportunity.



Seward Peninsula Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

RAC/SP 19050.KD

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

Re: Comments for Board of Game **Proposals 30, 33, 34, 39, 40, 41, and 42**

Dear Chairman Spraker:

I am writing to you on behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council) to provide comments on **Proposals 30, 33, 34, 39, 40, 41 and 42** coming before the Alaska Board of Game (BOG) at its Western Arctic/Western Region meeting scheduled for January 17 - 20, 2020, in Nome.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Seward Peninsula Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 22-23, 2019 in Nome. Among the agenda items discussed were several BOG proposals that would affect subsistence users and resources in the Seward Peninsula Region. The Council discussed and voted to submit the following comments to the BOG for consideration as it deliberates these proposals:



Spraker

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Proposal 30: 5 AAC 5 AAC 92.011(k). Taking of game by proxy.

Include muskox on the list of species that can be taken under a proxy permit in Unit 22.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal.

Council comments: Council members highlighted that muskox hunters in the region are well known and very proficient. It is a traditional practice for those with the means and hunting expertise to help those who are in need. Muskox should not be treated any differently than other species that are shared with community members who are either physically or economically unable to participate in this subsistence activity.

Proposal 33: 5 AAC 85.045. Hunting seasons and bag limits for moose.

Modify hunting seasons and require a registration permit for moose hunting in Unit 22D Remainder.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal.

Council comments: This proposal is similar to Federal Wildlife Proposal WP20-38, which was recently supported *with modification* by the Council at its October 22 - 23, 2019 meeting in Nome. The Council would like to align Federal and State regulations and therefore supports Proposal 33, which requests: 1) a to-be-announced Dec. 1 - Jan. 31 season for one antlered bull in Unit 22D Remainder, 2) the elimination of the Oct. 1 - Nov. 30 season, and 3) a registration permit system. The Council believes a to-be-announced system for a winter hunt would protect the low density moose population in Unit 22D Remainder, and allow for additional harvest during December and January if the harvest quota was not met in the fall. The Council determined that a harvest limit of one antlered bull during the December and January season is necessary to protect cow moose. The Council also agrees with the elimination of the Oct. 1 - Nov. 30 season in order to protect breeding bulls during the rut. (The Council proposed to eliminate the Oct. 1 - Nov. 30 season under Federal subsistence regulations through WP20-38 as well.) Users will still have the opportunity to harvest moose during the August and September, which is generally preferred due to the quality of meat, and possibly during a to-be-announced December and January season, if the harvest quota was not met in the fall. Finally, the Council believes that a registration permit is needed to document moose harvest in Unit 22D Remainder.

Proposal 34: 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a nonresident drawing hunt for moose in Unit 22D Remainder.

Council recommendation: The Council voted unanimously to **OPPOSE** this proposal.



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Council comments: Council members discussed the low-density moose population in Unit 22D Remainder. Opening up a non-resident hunt in this region would negatively impact subsistence users and threaten an already low density moose population.

Proposal 39: 5 AAC 85.020. Hunting seasons and bag limits for brown bear. 5 AAC 92.132. Bag limit for brown bears. Extend the hunting season for brown bear in Unit 22D and 22E, and increase the resident harvest limit.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal.

Council comments: Council members heard from the Alaska Department of Fish and Game that they are continuing to monitor the impacts of previous regulatory changes in these units and are neutral on this proposal. The Council, however, supports giving hunters more opportunity to take bears and does not believe it will negatively impact the population. The Council also believes that hunters would take two versus one bear if given the opportunity.

Proposal 40: 5 AAC 85.020. Hunting seasons and harvest limits for brown bear. Require a registration permit for brown bear hunting in Unit 22C.

Council recommendation: The Council voted unanimously to **OPPOSE** this proposal.

Council comments: The Council believes requiring a registration permit would be burdensome to hunters in an area where local subsistence users believe the brown bear population is high, and predation on moose and conflicts at fish camps are a problem.

Proposal 41: 5 AAC 85.020. Hunting seasons and harvest limits for brown bear. Extend the season date for brown bear hunting in Unit 22B and 22C.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal.

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Council comments: Council members support extending and aligning the season closing dates in Units 22B and 22C with the closing dates in adjacent Unit 22A. This would reduce regulatory complexity and provide additional opportunities to hunt brown bears in the region.

Proposal 42: 5 AAC 92.080(4)(B)(i). Unlawful methods of taking game; exceptions. Allow the use of snowmachines to position brown bears for harvest in Unit 22.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal.

Council comments: Council members noted that the use of snowmachines to position caribou, wolves or wolverine is currently permitted in Unit 22. These species may also be shot from a stationary snowmachine. Therefore, allowing the use of snowmachines to position bears would be consistent with current methods and means in the region. Permitting the use of snowmachines to position brown bears would be especially helpful during the spring months when access is difficult.

The Council thanks the BOG for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Seward Peninsula region. We look forward to continuing discussions with the Alaska Department of Fish and Game and BOG on subsistence matters affecting the region. If you have questions about this letter, please contact me through Karen Deatherage, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 474-2270 or karen_deatherage@fws.gov.

Sincerely,

Louis Green, Jr.
Chair

Cc: Federal Subsistence Board
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management
Gregory Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management



Suzanne Worker, Acting Subsistence Policy Coordinator, Office of Subsistence Management

Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management

Pippa Kenner, Anthropologist, Office of Subsistence Management

Tom Kron, Acting Council Coordination Division Supervisor, Office of Subsistence Management,

Karen Deatherage, Subsistence Council Coordinator, Office of Subsistence Management

Ben Mulligan, Assistant Commissioner, Alaska Department of Fish and Game

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game

Janet Bavilla, Regional Coordinator, Western Region, Board Support Section

Alaska Department of Fish and Game

Seward Peninsula Subsistence Regional Advisory Council

Interagency Staff Committee

Administrative Record



DEC 16 2019

BOARDS

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Alaska Board of Game and Parks Support
Sections.

Comments to:

2019/2020 Proposed Changes to
Regulations Western Arctic / Western Region

Submitted by: Brian West
1000 Oceanview Drive
Anchorage, Alaska 99515

Proposal 11. Support.

Proposal 12. Support.

Proposal 13. Support.

Proposal 21. Support. Adoption will help to limit the practice of taking only choice cuts from an animal and leaving the rest to rot. I have personally witnessed this, complaints to officials feel on deaf ears. By limiting harvest to what a person could actually use you also improve the health of the herd. Twenty five caribou would still provide over 2500 pounds of meat, or over 7 pounds each day.

Proposal 22. Oppose. There is no actual reason for the proposed change.

Proposal 23. Support.



Comments 2019/2020 Proposed Changes to
Western Arctic/Western Region.

Proposal 24. **OPPOSE**. With the generous bag limit in this area this will lead to the targeting of calves, to the detriment of the herd. Additionally, how can a person tell with certainty that a calf has been orphaned or abandoned? The mother could merely be out of sight. Adoption of this proposal would make it legal to shoot a cow accompanied by a calf, and then, since the calf has been orphaned, shoot the calf. The concern identified is that abandoned or orphaned calves all fall to predators and hence should be shot by people instead of falling prey to wolves and the like. However, some of these calves will survive. Adoption of this proposal will lead to lower calf survival rates to the detriment of the herd. It is short sighted and should be denied.

Proposal 25. **OPPOSE**. See comments to proposal 24.

Proposal 26. **OPPOSE**. Read the issue to be addressed and it becomes obvious that the moose population in this area is transitory. Fish & Game have not addressed how this harvest will affect the moose population in the area from which the moose migrate. Their own moose estimates



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Comments 2019/2020 Proposed Changes to
Western Arctic / Western Region

Proposal 26 ~~OPPOSE~~. Continued.

show that moose numbers are low.

The number of animals take is so small that this can not be seen as a viable population, therefore, hunting of cows should be eliminated not encouraged.

Proposal 28. ~~OPPOSE~~. If these residents need neither harvest tickets or licenses then no resident in the State can be required to obtain them. Laws cannot be selectively enforced. Why should the Department of Wildlife management be required to travel to these villages to collect required information spending money needlessly? I would think issuing citations for hunting without proper tags etc. is more appropriate than changing the regulations.

Proposal 36. ~~OPPOSE~~.

Proposal 37. SUPPORT. The needs of Alaska residents must have priority. When Alaska residents are restricted there should be no non-resident hunting.



Comments 2019/2020 Proposed Changes
to Western Arctic/Western Region

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Proposal 42. OPPOSE. What does "positioning" even mean? Does it mean chasing an animal until it collapses from exhaustion and then shooting it because it is now "positioned"? Positioning has no definition and should be removed from all regulations. Instead of adding brown bears the Board should eliminate this practice.



Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

P.O. Box 175, Nome, AK 99762

December 31, 2019

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

**SUBJECT: Board of Game Proposals 19, 20, 21, 22, 23, 24, 25, 28, 32
Western Arctic/Western Region**

To the Alaska Board of Game:

At its December 10-12, 2019 meeting, the Western Arctic Caribou Herd (WACH) Working Group voted to submit the following comments to the Alaska Board of Game regarding regulatory proposals 19, 20, 21, 22, 23, 24, 25, 28 and 32 for the Western Arctic/Western Region.

PROPOSAL 19 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Open a year-round, resident season for caribou bull harvest in Unit 23 as follows: ...

Comment: The WACH Working Group voted to support Proposal 19 (vote 18:0) to keep the bull season open year-round. If this change is made, some hunters would take young bulls during the currently closed period, which would relieve some pressure on the cows.

PROPOSAL 20 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Open a year-round, resident season for caribou bull harvest in Unit 23 as follows: ...

Comment: The WACH Working Group voted to support Proposal 20 (vote 18:0) to keep the bull season open year-round. If this change is made, some hunters would take young bulls during the currently closed period, which would relieve some pressure on the cows.

PROPOSAL 21 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in Unit 23 as follows: ... Limit total harvest per hunter to 5 caribou a day, 25 caribou total annually, this to include no more than 5 females annually.

Comment: The WACH Working Group voted to not support Proposal 21 (vote 0:18). The Working Group does not support a the proposed regulatory cow harvest limit at this time. The herd is currently within the Conservative Management Level in the



2019 Western Arctic Herd Cooperative Management Plan. The plan recommends only a voluntary reduction in cow harvest at this management level, not a regulatory restriction on cow harvest.

PROPOSAL 22 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Extend the season for taking cow caribou in Unit 23 Remainder through April 15 (season currently closes March 31).

Comment: The WACH Working Group voted to not support Proposal 22 (vote 9:9, motion in support did not carry). As the vote tally indicates, the Working Group was split on this proposal.

- Those who voted not to support the proposal thought it important to avoid stressing or harvesting pregnant cows in April as they begin migrating toward the calving grounds.
- Those who voted to support the proposal wanted to provide additional opportunity for hunters to get meat for their families for the spring months and thought that the current herd population level could support additional cow harvest.

PROPOSAL 23 – 5 AAC 92.080(4)(B). Unlawful methods of taking game; exceptions. Restrict the use of snowmachines for taking caribou in Unit 23 as follows: ...

Comment: The WACH Working Group voted to support Proposal 23 (vote 11:7).

- Those who spoke in support of the proposal noted that it would still allow the use of snowmachines to position for hunting. They saw a conservation benefit in requiring the driver to slow to 15 mph when within 200 yards of the herd to avoid harassing or tiring the herd.
- Those who voted to oppose the proposal believe that current regulation is sufficient and there is no need for change.

PROPOSAL 24 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Remove the restriction on caribou calf harvest in Unit 23 as follows: ...

Comment: The WACH Working Group voted to support Proposal 24 (vote 15:1, 2 abstentions). The intent of this proposal is to allow for calves to be harvested in those circumstances where they have lost their mother and are wandering unattached to the herd.

PROPOSAL 25 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Remove the restriction on caribou calf harvest in Unit 23 as follows: ...

Comment: The WACH Working Group voted to support Proposal 24 (vote 15:1, 2 abstentions). The intent of this proposal is to allow for calves to be harvested in those circumstances where they have lost their mother and are wandering unattached to the herd.



PROPOSAL 28 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope resident hunters as follows: ...

Comment: The WACH Working Group voted to not support Proposal 28 (vote 9:9, motion in support did not carry). As the vote tally indicates, the Working Group was split on this proposal.

- The Working Group members who did not support the proposal noted that the 2019 Western Arctic Caribou Herd Cooperative Management Plan calls for intensifying efforts to monitor harvest when the herd is at the Cooperative Management Level. It is important to get more harvest data, through the RC907 permit and other methods, to evaluate management needs and options. The Working Group has been encouraging hunters to report their harvest (e.g., through articles in its annual newsletter *Caribou Trails*). The North Slope Borough (NSB) collects data on subsistence harvest, but the methodology is more similar to community harvest surveys than reporting of individual harvest data. There is value to continuing both of these methods of collecting data about caribou harvest.
- The Working Group members who voted to support the proposal have more confidence in the NSB data than in the harvest ticket data, and they suggest that the NSB data should be used for management. They believe that local hunters will give more accurate harvest information to local NSB interviewers. They view the state registration permit to be duplicative, without substantial benefit.

PROPOSAL 32 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E as follows: ...

Comment: The WACH Working Group voted to not support Proposal 32 (vote 1:17).

On behalf of the Western Arctic Caribou Herd Working group, I thank you for this opportunity to comment.

Regards,

Vern Cleveland, Sr., Chair