

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**  
c/o Office of Subsistence Management  
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JAN 15 2020

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

Re: Comments for Board of Game Proposals 1, 2, 6, 7, 11, 12, 15, and 16

Dear Chairman Spraker:

I am writing to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide comments on Proposals 1, 2, 6, 7, 11, 12, 15, and 16 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 Yukon-Kuskokwim Delta 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 November 6-8, 2019 in Bethel. Among the agenda items discussed were several Alaska Board of Game proposals that would affect subsistence users and resources in the Yukon-Kuskokwim Delta Region. At that meeting the Council reviewed and made recommendations on the following 2019/2020 Alaska Board of Game statewide and Unit 18 wildlife proposals:

**Proposal 1:** Prohibit nonresident hunting of moose or caribou under intensive management in the Western Arctic/Western Region until harvest or population objectives are met.  
**Support.**

The Council supports the plan to close moose and caribou hunting to non-residents in the event moose or caribou populations decline enough to warrant intensive management. This would help provide for local communities needs until the harvest or population objectives are met.

**Proposal 2:** Establish intensive management programs for bear across the Western Arctic/Western Region.

**Support**

The Council believes that the bear population is increasing across the Yukon-Kuskokwim Region with many reports of bears in and around local communities causing safety concerns. Bears are increasingly getting into fish camps and eating subsistence fish, which are important to Federally qualified subsistence users.

**Proposal 6:** Add muskoxen to the list of species that can be taken under a cultural education permit for Unit 18.

**Support proposal 6 with modification to include both Nunivak and Nelson Island public schools.**

The Council supports this cultural and education opportunity for youth to be able to harvest muskoxen and learn traditional skills associated with the hunt and preparation of meat and hides. The Council views this as a positive opportunity for youth that should be open to Nelson Island, as well as Nunivak Island residents, since they traditionally hunt muskoxen.

**Proposal 7:** Change the opening date for the registration moose hunt, RM615, in Unit 18 from September 1 to September 5.

**Support.**

The Council supports pushing back the start date of the moose season in zone 1 Kuskokwim of the moose hunt area so that the start of the hunt begins later in the season when it is not so hot and humid. The hunt will still only be open until the harvest quota is met, so there won't be a conservation concern. The Council supports a more effective hunt for subsistence hunters when weather is cooler and later in the season, when the conditions are better for meat preservation. The Council suggests, if the later opening date is adopted, that outreach will be important to ensure everyone is aware that the moose hunt will not be opening on September 1, so that they don't inadvertently hunt out of season.

**Proposal 11 and 12:** Establish and minimum caliber rifle to harvest moose in Unit 18 to require a minimum caliber of .243 or 6 mm caliber centerfire rifles for the harvest of moose in Unit 18.

**Support**

The Council supports encouraging ethical moose hunting and salvage practices by mandating .243 caliber and larger caliber, which provide real killing power. The Council stressed that a smaller caliber rifle is not sufficient to effectively hunt large animals such as moose.

**Proposal 13:** Prohibit the sale of antlers from moose harvested in Unit 18.

**Support.**

The Council is in support of this proposal due to increasing concerns over wanton waste and harassment of moose in order to obtain antlers for sale. The Council feels a regulation would help monitor antlers being shipped out of the region and ensure that moose are not being killed

just for the antler value while the meat goes to waste. Some communities have reported antlers being stolen from properties, now that the antler value is so high.

**Proposal 15:** Address customary and traditional use findings for Alaska hares in Unit 18 and modify season and bag limit for Alaska hares from no closed season and no bag limit to 2 Alaska hares per day, 6 in possession with an Aug. 1 – May 31 season.

**Support.**

The Council is supportive of some harvest limits being placed on Alaska hares (locally referred to as jackrabbits) until more is known about this hare population. Some limits enacted now will help prevent overharvest and ensure this subsistence resource is available into the future.

**Proposal 16:** Extend the hunting seasons and bag limits for brown bears in Unit 18.

**Support with an amendment to extend the season closing date. The new season would be September 1 to July 31.**

The Council supports extending the brown bear season since the population has been increasing in the area and there is no conservation concern at this time. The Council recommends extending the season further into the end July, so that brown bears can be hunted when they are encountered around fish camps.

The Council thanks the Alaska Board of Game for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Yukon-Kuskokwim Delta Region. We look forward to continuing discussions with the Alaska Department of Fish and Game and the Alaska Board of Game on subsistence matters affecting the region. If you have questions about this letter, please contact me through Eva Patton, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 786-3358 or [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov).

Sincerely,



Alissa Rogers  
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,

**Eva Patton, 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  
Y-K Delta Subsistence Regional Advisory Council  
Interagency Staff Committee  
Administrative Record**