

RC 016

**Board Support Section
Juneau. Ak
ATT Bog Chairman**

Dear Chairman and Board Members

PROPOSAL 13

5 AAC 92.200. Purchase and sale of game.

Prohibit the sale of antlers from moose harvested in Unit 18

Opposed

My Name is Len Fabich

I am the owner of Fabich Enterprises. I reside in Homer Alaska but my antler business operates almost solely in Unit 18. I apologize for my late submittal. I only recently became aware of Proposal 13 which I adamantly oppose.

I can tell you that this proposal is almost solely directed at me as the main antler buyer of harvested Moose antlers during Sept and Oct in Unit 18 on the Yukon River.

I would like to provide information, that is in direct opposition to the information provided by the local advisory board in these villages. I am aware of the few members of this board that are in opposition to what I do for the communities in the region. It has come to my attention that there are Advisory Board members that were not even aware of this proposal. It was submitted with a rubber stamp by individuals with malice. As someone with the facts and first hand knowledge of what is really happening in regards to Proposal 13 and antler buying I would like to present the following information.

In regards to people targeting large bulls this is not true. I buy in the 9 villages of Russian Mission, Marshal, Pilot Station, St Marys, Pitkas Point, Mountain Village, Kotlik, Emmonack, Alukanuk, I have been buying harvested antlers since about 2013. Although initially when I began buying antlers in 2013 I saw an increase in antler size harvested for a few years, this quickly diminished as people realized that large bulls do not taste very good compared to younger bulls. Consequently the size has decreased dramatically. The average number of pounds per sale in the nine villages averages approx 21 lbs. As you can see from my data below. 21 lbs would be the antlers from a young bull approx a 30-40 inch spread. The reality of it is that the targeting of large bulls is preferred by ADFG. Actually the harvest of cows is preferred as the population is over its carrying capacity in its upper reaches of unit 18. Thus the liberal harvest allowances of two cows in Oct-Nov. This there is little to no biological justification to this proposal. I made over 272 purchases in Sept Oct of 2019 in the 9 villages. Individual hunters well over 400 hunters as many sales were multiple family member hunters in one sale. This is a big deal to the hunters and families of Unit 18. This proposal was kept quiet and not published for comment to the people of unit 18.

Wanton Waste.

To my knowledge I am not aware of one case that has been prosecuted with regards to antlers being taken and meat not salvaged. I have worked with the Bethel Troopers on one occasion where this did occur. Although a case was not prosecuted it did result in no more incidences that I am aware of in the area. I pursue the letter of the law in this matter and am opposed to any behavior that is not legal.

Increase in Theft

The villages are no stranger to theft. I have lived in the region since 1984 to 2005 and have traveled to the area yearly multiple times per year. If it is of value you better lock it up. Antlers were at one time of no value. With the increase of value as well as multiple places to sell them Antlers are valued and thus stolen. Nobody leaves as much

as a 5 gallon can of gas in their boat any more or in their yard. Or it will be taken. Antlers are no different. People are taking much more care in their protection now. It has been an educational experience for the people.

As far as traditional usage.

What is happening is an increase in hunting opportunity for communities as they can recoup their fuel expense through the sale of antlers. A much appreciated benefit from the antlers that come home for sale.

I have witnessed a huge increase in the outdoor activity regarding seeking of antlers, Mostly in the winter. A healthy alternative to someone staying home with no money or no way to make money. Shed Antlers have become a major source of cash income in the villages. It is a win win for the communities to be able to sell their antlers.

I would like to offer the following statistics with regard to financial benefits to the homes and communities in these 9 villages. In Sept and Oct 2019 and harvested antler. I distributed over \$60,000 into the villages of the Lower Yukon in a one month period of time. The average sale was typically between \$150-\$189 per sale. Weight per sale usually about 20 to 24 lbs per household. This could have been multiple sets of antlers within a home also. This represents a huge influx of needed cash in an economically disadvantaged area. Although harvested antlers do not make up the majority of my antler business now that the local people are in pursuit of sheds It would result in a huge loss of needed cash in the communities.

Sample of sales in Sept /Oct for Harvested Antler	# of Families selling	Average weight of sale in lbs of antler per sale	Total Village sales	Average value per household
Mountain Village	20	21	\$3,588.00	\$179.40
Russian Mission	44	20.73	\$6,539.00	\$145.00
Kotlik	57	26	\$10,811.00	\$189.67
Alukanuk	37	24.8	\$6,838.00	\$184.81

I would like to Thank the board members for your time and effort. I appreciate what you do and am pleased to be part of this process. Thank You for your time and consideration.

I would be more than pleased to talk to anyone regarding this information.

I was able to talk to Board Members on Jan, 14, 2020 Al Barrette and Stach Hoffman.

Sincerely

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