



**Gates of the Arctic National Park
Subsistence Resource Commission
4175 Geist Road
Fairbanks, Alaska 99709
(907) 455-0639 or Fax (907) 455-0601**

November 16, 2021

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

Dear Boards Support,

The Gates of the Arctic National Park Subsistence Resource Commission (SRC) met on November 16, 2021 and took up Board of Game Statewide proposals. At this time, the SRC is submitting comments on proposals 172 and 173 in time for the Board of Game meeting scheduled for March 4-11, 2022.

Proposal 172

Clarify the legal use of highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area (DHCMA) for hunting and trapping. Clarify the use of firearms, and transport of furbearers and trapping bait when trapping in the DHCMA.

Gates of the Arctic National Park Subsistence Resource Commission comments

The current regulations on prohibition of firearms and off-road vehicles and other land management regulations are redundant because State statutes already cover this.

The SRC opposes this proposal (5 to 0). Justification – This proposal relies heavily on statutory change by the Alaska State legislature and the Governor’s concurrence. The likelihood of the State legislature taking this up is slim. The following issue would need to be addressed: federally qualified subsistence users from Wiseman, Anaktuvuk Pass, and Nuiqsut should be able to access federal public lands within the Dalton Highway Corridor with all-terrain vehicles and should be able to return home.

The SRC strongly suggests that instead of taking this regulatory route, ADF&G should speak with the North Slope Borough Planning Department so that the oil industry checkpoints are being enforced. Non-North Slope residents should not be egressing certain areas in the oil industry complex to go hunting.

The SRC suggests the following language in order to clarify **Regulation 5 AAC 92.530**.

The Dalton Highway **Controlled Use** [MANAGEMENT] Area:

- (A) the area consists of those portions of Units 20 and 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River **traveling north to Deadhorse to the intersection at East Lake Colleen Drive, to Spine Road, to West Dock Road, and ending at 70° 18' 17.44" N. lat., 148° 30' 16.05" W. long.** [TO THE ARCTIC OCEAN] and including the Prudhoe Bay Closed Area.
- (B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway **Controlled Use** [MANAGEMENT] Area is closed to hunting **and open to**

Taqulik Hepa (Chairperson), Jack Reakoff (Vice-Chair), Pollock Simon Sr., Tim Fickus, Raymond Woods., Hugh Bifelt, and Esther Hugo

trapping; however big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;

(C) no **off-road** [MOTORIZED] vehicle, **as defined in 5 AAC 92.004(c)**, may be used to transport [HUNTERS] **individuals actively engaged in hunting** [,HUNTING GEAR OR PARTS OF GAME], within the Dalton Highway Corridor **Controlled Use** [MANAGEMENT] Area, except that

i) **Off-road** [LICENSED HIGHWAY] vehicles may be used on the following roads:

*****Take out licensed highway vehicles**

(1) Dalton Highway

(2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the is open for winter travel,

(3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including gravel pit access road when the gate is open,

(4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility, (5) **the Sagavanirktok River boat launch at the DOT camp at Dalton Highway milepost 305.6**

(6) Wiseman Village Road,

(7) any constructed roads and Community Winter Access Trails to Anaktuvuk Pass, Nuiqsut, Utqiagvik, Atqasuk, and Wainwright during the periods when the Bureau of Land Management and the North Slope Borough announce the road or trail is open for winter travel [THE SAGAVANIRK TOK RIVER ACCESS ROAD TWO MILES NORTH OF PUMP STATION 2, AND (6)]

and (8) any constructed roadway or gravel pit, within one [ONE-QUARTER] mile of the Dalton Highway, that does not have a locked barrier;

[(II) AIRCRAFT AND BOATS MAY BE USED;]

[(III) A SNOWMACHINE MAY BE USED TO CROSS THE MANAGEMENT AREA FROM OUTSIDE THE MANAGEMENT AREA TO ACCESS LAND ON THE OTHER SIDE OF THE MANAGEMENT AREA];

[(IV) GAME MAY BE TRANSPORTED BY MOTORIZED VEHICLES UNLESS PROHIBITED BY STATUTE;]

(D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor **Controlled Use** [MANAGEMENT] Area;

(E) a snowmachine may not be used for hunting within the Dalton Highway Corridor Controlled Use Area or to access areas outside the corridor to hunt big game or to transport big game hunters, big game hunting gear, or parts of big game, except that

(i) a snowmachine may be used by a person who must traverse land in the highway corridor to travel to or from private property that has an established history of use as a homestead, or to a residence in Nuiqsut, Anaktuvak Pass, Kaktovik, Utqiagvik, Atqasuk, Wainwright, Point Lay, or Point Hope;

(ii) a snowmachine may only be used if that use begins and ends outside the corridor;

(F) aircraft and boats may be used.

Proposal 173

Repeal the Dalton Highway Corridor Management Area

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The current regulations on prohibition of firearms and off-road vehicles and other land management regulations are redundant because State statutes already cover this. If these regulations were to be repealed by the Board of Game, nothing changes because the State statutes would cover the legalities.

The SRC opposes this proposal (5 to 0). Justification – This proposal relies heavily on statutory change by the Alaska State legislature and the Governor’s concurrence. The likelihood of the State legislature taking this up is slim. The following issue would need to be addressed: federally qualified subsistence users from Wiseman, Anaktuvuk Pass, and Nuiqsut should be able to access federal public lands within the Dalton Highway Corridor with all-terrain vehicles and should be able to return home.

The SRC strongly suggests that instead of taking this regulatory route, ADF&G should speak with the North Slope Borough Planning Department so that the oil industry checkpoints are being enforced. Non-North Slope residents should not be egressing certain areas in the oil industry complex to go hunting.

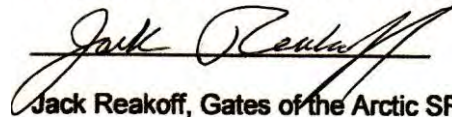
The SRC would also like to point out that eliminating the Dalton Highway Corridor Management Area (DHCMA) would eliminate the draw moose hunting permit in Unit 24A because the DHCMA delineates the regulatory language. The moose population in Unit 24A is already in hardship, so one season without a draw hunting permit could devastate the population. There are several concerns about the hunting regulations in Units 26A and 26B and protecting the Teshekpuk and Central Arctic caribou herds. There’s a lot of management involved in the DHCMA and if this management were to be modified, there could be a lot of problems.

Thank you for your time and consideration.

Sincerely,



Taqulik Hepa, Gates of the Arctic SRC Chair



Jack Reakoff, Gates of the Arctic SRC Vice-Chair