



Alaska Board of Game  
 P.O. Box 115526 Juneau,  
 AK 99811-5526  
 (907) 465-4110  
[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

**Board of Game Comment from Chugach Regional Resources Commission on Proposals 86, 127, 128, 129, 131, 161, 163, 164, 165, 166, 167, 168, 169, 170, 171, and 172**

The Chugach Regional Resources Commission (CRRC) is an intertribal organization serving seven tribes in the Chugach Region including the Tatitlek Village IRA Council, Native Village of Eyak (Cordova), Port Graham Village Council, Nanwalek IRA Council, Chenega Bay IRA Council, Qutekcak Native Tribe (Seward), and the Valdez Native Tribe. CRRC is writing to the Board of Game (Board) to support Proposals 86, 127, 128, 129, 131, 161, 163, 164, 165, 166, 167, 168, 169, 170, 171, and 172.

CRRC supports Proposal 86 to have the Board reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C. The moose in this region have a history of population fluctuations and the antlerless permits allow the Department of Fish and Game (ADF&G) to manage the moose population in the region in a sustainable way that keeps the population healthy. Too many moose in the Twentymile/Portage/Placer area can lead to starvation as increased moose populations over browse their habitat and increases in moose-vehicle collisions. The current antlerless moose system has been successful and because of this success, CRRC encourages the Board to support this proposal.

CRRC supports proposal 127, extend the TM549 open season for moose in Unit 15C, southwest of a line from Point Pogibshi to the point of land between Rocky and Windy Bays in order to increase hunter opportunity in the area. Nanwalek and Port Graham still participate in the TM549 hunt and currently receive a total of 4 permits between them for moose in the Lower Cook Inlet (ADF&G, 2019; Jones & Kostick, 2016, p. 296), for populations of 212 and 177 people, respectively (U.S. Census Bureau, 2020); however, residents of both communities report that they are experiencing increasing difficulty obtaining moose during the fall hunting season due to the increasing abundance of vegetation and decreased snowpack occurring later in the season. Area hunters have been experiencing effects of climate change. Moose are migrating and rutting later

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than usual. A longer season would allow hunters more flexibility to schedule hunts around challenging weather conditions. ADF&G data shows that Tier II TM549 moose harvest has declined in recent years. From 2011-2017 hunter harvest averaged 2.4 moose/year. However, the most recent three-year average is 1.3 moose/year. ADF&G have reported that no moose have been harvested between 2010-2021 prior to September 1<sup>st</sup>. The earliest date of harvest during this time was September 4<sup>th</sup>.

CRRC supports Proposal 128, to have the Board reauthorize the antlerless moose season for the Homer bench hunt (DM549) and targeted hunt (AM550) along the Sterling Highway in Unit 15C. The Homer bench area of Unit 15C has a high density of moose. During snowy winter these moose migrate into areas of high human population which is problematic. Moose in this area have been reported to die from starvation. The targeted AM550 hunt allows for hunting of moose along the Sterling Highway in Unit 15C. This hunt assists in keeping moose populations down and reducing moose-vehicle collisions in the area. ADF&G decides when and where permits will be issued for these hunts, with the number of permits being dependent on conditions. This method is working for these areas in Unit 15C and as such CRRC encourages the Board to support this proposal.

CRRC supports Proposal 129, to expand the boundaries of the Homer cow moose hunt as follows... Beginning at the mouth of Deep Creek then easterly along Deep Creek to Caribou Lake to the outlet of Fox Creek, then south along Fox Creek to the mouth of Fox Creek. Since the inception of the Homer cow moose hunt (DM549) the land that was once open has for the most part been developed and/or posted. This has resulted in increasing conflict as hunting effort is concentrated in only a few legal areas. Research has shown that cows in Unit 15C wander widely and that expanding the area of the hunt would not be detrimental to the overall moose population. CRRC supports Proposal 131 to have the Board reauthorize the antlerless moose season on Kalgin Island in Unit 15B. The moose on Kalgin Island have successfully been managed by the antlerless moose hunt, this hunt has allowed ADF&G's management to reach their objectives with this moose population. The moose on this island have had high population numbers since at least the early 1990s, and Kalgin Island is predator-free area, so other measures need to be taken so that the moose living on the island do not exceed their carrying capacity.

CRRC supports Proposal 161, that directs ADF&G to conduct a feasibility study for transplanting Sitka Blacktail deer in Unit 15C, southside of Kachemak Bay. This would increase opportunity for hunting, food security, local economy, and wildlife viewing in Unit 15C. The southside of

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Kachemak Bay would be a productive area to explore the idea of transplanting Sitka Blacktail deer. The area is ecologically quite different than the Homer side and provides very similar habitat, browse, and other fauna to Prince William Sound, northern Southeast Alaska, and much of the Kodiak Archipelago; all locations of successful past ADF&G transplant operations which now provide opportunity for all.

CRRC Opposes proposal 163 to rescind the bag limit restrictions for sea duck hunting in Unit 15C as follows: In effect, eliminate special sea duck restrictions for Unit 15C, restoring seasons and bag limits applicable to the entire Gulf Coast Zone – Units 5, 7, 9, 10, (Unimak Is. Only) and Units 14-16. Rescind bag limit restrictions for sea duck hunting in Unit 15C adopted by the Board of Game in 2010. The reductions in bag limits for eiders, harlequin ducks and long-tailed ducks were not based on best available scientific data nor were they consistent with management guidelines by ADF&G, Pacific Flyway Council, or U.S. Fish and Wildlife Service to address necessary conservation needs.

CRRC supports proposal 164 to reduce the bag limit for Goldeneye in Units 7 and 15 as follows: Bag limit for Goldeneye: 4/day, 8 in possession. Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of populations trends, we suggest that a bag limit on some sea ducks be reduced.

CRRC supports proposal 165 to reduce the bag limit for goldeneye in Unit 15C as follows: 4 Goldeneye per day, 8 in possession. Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.” A bag limit reduction on goldeneye is needed to ensure hunt opportunities now and in the future.

CRRC supports proposal 166 to reduce the bag limit for bufflehead in Units 7 and 15 as follows: Bufflehead: 4 per day, 8 in possession. Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation

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concerns conservatively. In lieu of any current accurate data of populations trends, we suggest that a bag limit on some sea ducks be reduced.

CRRC supports proposal 167 to reduce the bag limit for bufflehead in Unit 15C as follows: 4 Bufflehead per day, 8 in possession. Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.” A bag limit reduction on bufflehead is needed to ensure hunt opportunities now and in the future.

CRRC opposes proposal 168 to reduce the bag limit for harlequin duck in Units 7 and 15 as follows: Harlequin Duck : 1 per day, 2 in possession. Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of populations trends, we suggest that a bag limit on some sea ducks be reduced.

CRRC supports proposal 169 to reduce the bag limit for harlequin in Unit 15C as follows: 1 Harlequin per day, 2 in possession. Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.” A bag limit reduction on harlequin is needed to ensure hunt opportunities now and in the future.

CRRC opposes proposal 170 to reduce the bag limit for long-tailed duck in Units 7 and 15 as follows: Long-tailed Duck: 1 per day, 2 in possession. Anecdotal and undeniable evidence attests to a drastic decline in sea duck numbers in Kachemak Bay in recent history. Given the three year delay in addressing management issues in Units 7 and 15, it would be prudent to address conservation concerns conservatively. In lieu of any current accurate data of populations trends, we suggest that a bag limit on some sea ducks be reduced.

CRRC supports proposal 171 to direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6, 7, and 15 as follows: Direct the ADF&G to institute mean and methods to record sea duck harvest as accurately as possible. Given that there is nearly no current

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data on sea duck harvest and that there is growing concern about population trends hunter harvest data should be collected.

CRRC supports proposal 172 to require mandatory harvest reporting for sea ducks in Kachemak Bay in Unit 15C as follows: Regulatory language could be modeled on regulations in the State of Washington, which reads: "To improve management of certain limited migratory bird species, you are required to possess a Migratory Bird Authorization and Harvest Record Card(s) if you are hunting those species (see page 10). The current reporting system, Alaska's Migratory Bird Harvest Information Program (HIP), does not give us enough information and puts us in danger of over-harvest. HIP invites voluntary reporting from a very small, randomized group of hunters from across the state: it gives just a little information on a statewide level and does not consider regional variations.

CRRC thanks the Board for taking the time to read our comments and again urges the Board to support proposals 86, 127, 128, 129, 131, 161, 163, 164, 165, 166, 167, 168, 169, 170, 171, and 172.

If you have any questions for us you can contact me at [REDACTED] or by phone at [REDACTED]

Thank you,

Willow Hetrick Price

Willow Hetrick  
Executive Director  
Chugach Regional Resources Commission

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