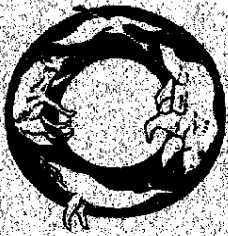


ALASKA BOARD OF GAME
November 13th – November 15th, 2009
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THE ALASKA WILDLIFE ALLIANCE

"LETTING NATURE RUN WILD"

*Attn: Scott
Public Comment
BOG
Archie/Walsten*

October 30, 2009

Alaska Department of Fish and Game
Board of Game
333 Raspberry Road
Anchorage, Alaska 99518-1599

Re: Upcoming Regional Meeting in Nome, Alaska (Arctic Region, mid-November, 2009)

Dear Board of Game:

The Alaska Wildlife Alliance, a non-profit organization with offices in Anchorage, Alaska, Board members residing throughout Alaska, and hundreds of members, endorses and supports the following Proposals that will be heard before you in Nome during your Fall meeting, scheduled for mid-November, 2009:

Proposal 6

Proposal 15

Proposal 18

Proposal 23

Proposal 29

and

Proposal 33

RECEIVED
OCT 30 2009
BOARDS
ANCHORAGE

Our Board of 9 members has authorized this letter and is unanimous in its support for these Proposals.

Thank you for your consideration.

Sincerely,

Andrew Josephson
President
Alaska Wildlife Alliance



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199

Mr. Cliff Judkins, Chairman
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

OCT 29 2009

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (FWS) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game (BOG) during its fall 2009 meeting. We would like to provide the following comments on proposals 1 through 5 which would affect the management of moose populations in Unit 18, including lands within the Togiak and Yukon Delta National Wildlife Refuges (NWR).

Proposal 1 would change the season dates for the Goodnews River drainage and south to the Unit 18 boundary from August 25 to September 20 to September 1 – 30 and change the existing 10 bull quota to no quota for moose.

The FWS **supports adoption of proposal 1 with amendment for a quota of “up to 20 bulls”**. The season date change would allow hunters three extra days (30 days total) to hunt later into September. Hunter success may improve as bull moose become less wary in late September. However, this change should not affect the moose population, as much of the area is inaccessible. Also, the hunt could be closed if the quota or harvest objective is met before the end of the open season. The residents of Goodnews Bay and Platinum have worked cooperatively with the Togiak NWR and Alaska Department of Fish and Game (ADF&G) in promoting the growth of the moose population in the affected area. As a result, the moose population increased from only 2 in 2002 to a minimum of 142 by March 2009.

The FWS **opposes proposal 2** which would lengthen the season dates for moose in the lower Kuskokwim portion of Unit 18 by 10 days from September 1 – 10 to September 1 – 20. During the fall of 2009 the State managed a hunt with a harvest limit of 75 moose in the Lower Kuskokwim. This harvest limit was exceeded by at least 25 animals after the 10 day hunt. The lower Kuskokwim moose population is growing but we believe it cannot sustain additional harvest that would result from an extra 10 days of hunting. The Yukon Delta National Wildlife Refuge biological staff believes a sustainable harvest goal is closer to 50 bull moose for the area along the

Mr. Cliff Judkins, Chairman

2

mainstem of the Kuskokwim River (75 including tributaries). If the moose population in the lower Kuskokwim area is over harvested, we believe it could fall below sustainable levels fairly quickly. This could occur after everyone has worked hard over the past five years to help grow the population during the moose hunting moratorium.

The refuge does plan to continue conducting moose surveys this year in an effort to monitor the growth of the population.

Proposal 3 would open a new winter moose season for the same lower Kuskokwim area of Unit 18 with dates of January 1 – 5. The FWS **opposes proposal 3** since we believe the moose population cannot sustain the additional harvest that would result from a 5 day winter hunt. Our concerns are the same as those outlined in the previous proposal above. We understand the need for local residents to supplement their protein in the winter with more moose, however, we believe this would be detrimental to the long term health of the moose population and ultimately would be detrimental to subsistence users.

The FWS **supports adoption of proposal 4** which would change the hunt area boundary for management of the lower Kuskokwim River moose population in Unit 18. The Yukon Delta National Wildlife Refuge has submitted a similar proposal to the Federal Subsistence Board.

This boundary change would use the Johnson River for much of its length which is a natural geographic midpoint between the Yukon and the Kuskokwim rivers. The geographic separation is easily identifiable by hunters and does not require a map or GPS to determine if you are hunting moose in a particular area.

In recent years the law enforcement effort in this area has been confusing to both LE personal and hunters. The new boundary line would help alleviate this issue for both LE officers and hunters.

The FWS **supports adoption of proposal 5** which would change the hunt area boundary and extend the winter season dates for moose in the Lower Yukon Area of Unit 18. Again, the Yukon Delta National Wildlife Refuge has submitted a similar boundary change proposal to the Federal Subsistence Board.

The area that would now be included with the boundary change would expand the area that includes the exceptionally productive Lower Yukon moose population and more liberal hunting opportunities. The latest estimates of density are almost 3 moose per square mile. Biologically, the additional harvest expected from the boundary change and the extended winter season would likely help slow the growth of this moose population that has a growth rate of 27%.

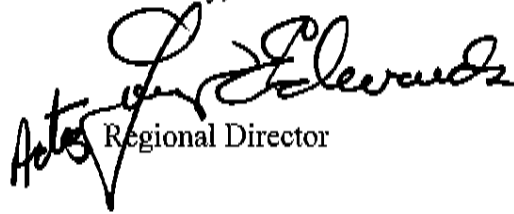
Mr. Cliff Judkins, Chairman

3

The new boundary line would use the Kashunak River which is a natural boundary that would include the Lower Yukon villages that are socially and economically connected. This new boundary line would also help to eliminate confusion for both hunters and LE officers. Currently, a GPS is required to help establish where the legal boundary is located.

Thank you for your time to review our comments on these proposals.

Sincerely,



Regional Director



KAWERAK, INC. • P.O. Box 948 • Nome, AK 99762



TEL: (907) 443-5231 • FAX: (907) 443-4452



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SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

October 29, 2009

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

Dear Board of Game:

The Kawerak Reindeer Herders Association considered the wildlife proposals and hereby submit the following comments in regards to several proposals.

Proposal 6: Wolf *Kawerak Reindeer Herders Association opposes this proposal. There is a growing population of wolves on the Seward Peninsula and low populations of their prey (reindeer, moose, caribou). Human harvest of their prey, the large mammals in the region, is important to family health, traditions and economy.*

Proposal 13: Brown bear *Kawerak Reindeer Herders Association supports this proposal. The brown bear population throughout GMU 22 is large. This proposal would extend the opportunity to legally hunt bear in the spring.*

Proposal 14: Caribou *Kawerak Reindeer Herders Association opposes this proposal as these areas include lands near Teller, the area south of Imuruk Basin and the area northwest of Brevig Mission. This area is closed to caribou hunting unless opened by Emergency order. There are active reindeer herds in these areas throughout the year.*

Proposal 15: Brown bear *Kawerak Reindeer Herders Association opposes this proposal. The brown bear population throughout GMU 22 is large. This proposal would reduce the opportunity to legally hunt bear in the fall. Although the state does not manage wildlife on federal land, we support mutual bear management on all lands.*

Thank you for your consideration. We look forward the meeting to be held in our region.

Sincerely,
KAWERAK REINDEER HERDERS ASSOCIATION

Tom Gray
Tom Gray, President
CC: Donnie Olson



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



IN REPLY REFER TO:

FWS/OSM/BOG/9136

OCT 29 2009

Mr. Cliff Judkins, Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The Alaska Board of Game is scheduled to meet November 13-16, 2009, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Arctic and Western Regions. We have reviewed the 35 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, 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 comments 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 Chuck Ardizzone, Wildlife Liaison, 907-786-3871, with any questions you may have concerning this material.

Sincerely,

Peter J. Probasco,
Assistant Regional Director

cc: Denby Lloyd, ADF&G
Mike Fleagle, Chair, FSB
Kristy Tibbles, Board Support Section
Tina Cuning, ADF&G
Interagency Staff Committee
Chuck Ardizzone, OSM

TAKE PRIDE
IN AMERICA 

RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Arctic and Western Alaska Regions

November 13-16, 2009

Nome, Alaska

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)

PROPOSAL 1 - 5 AAC 85.045. Seasons and bag limits for moose. Modify the resident season dates and quota for moose hunting in Unit 18 as follows:

Goodnews River drainage and south to the Unit 18 boundary: One antlered bull by state registration permit, open season, [AUGUST 25-SEPTEMBER 20] **September 1-September 30, without a quota.**

Current Federal Regulation:

Unit 18—Goodnews River drainage, and south to the Unit 18 boundary—1 antlered bull by State registration permit. Any needed closures will be announced by the Togiak National Wildlife Refuge Manager after consultation with BLM, ADF&G, and the Chair of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council.

Aug. 25–Sept. 20

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

Impact to Federal subsistence users/wildlife: The longer season would provide additional time for subsistence users to hunt moose. A lack of a quota for this hunt could be detrimental to the small moose population by allowing over harvest of the resource.

Federal Position /Recommended Action: The OSM recommendation is to **support with modification**, to amend the quota to “up to 20 bulls”.

Rationale: The residents of Goodnews Bay and Platinum have worked cooperatively with the Togiak National Wildlife Refuge and Alaska Department of Fish and Game in promoting the growth of the moose population in the affected area. Indeed, the moose population increased from only 2 in 2002 to at least 142 by March 2009. The requested season change will allow moose hunters five extra days (30 days total) to hunt. Hunter success may improve as bull moose become less wary in late September. However, this change should not affect the moose population, as much of the area is inaccessible and the hunt can be closed if the quota or harvest objective is met before the end of the open season. The “up to 20 bulls” language would allow managers the flexibility to adjust the quota if the moose population increases.

~~~~~

**PROPOSAL 2 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the season dates for resident moose hunting in Unit 18 as follows:

Unit 18, residents only, one antlered bull, September 1-~~20~~[10]

**Current Federal Regulation:**

Unit 18, that portion east of a line from the mouth of the Isahkowiik River to the closet point of Dall Lake, then to the easternmost point of Takslesluk Lake, then along the Kuskokwim River Drainage boundary to the Unit 18 boarder and north of (and including) the Eek River Drainage.

No Federal open season.

*Federal public lands are closed to the hunting of moose by all users.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No, however a proposal to establish community harvest limits in the Kuskokwim portion of Unit 18 will be considered by the Federal Subsistence Board at its May 2010 meeting.

**Impact to Federal subsistence users/wildlife:** The longer season would provide additional time for subsistence users in the region to hunt moose.

**Federal Position /Recommended Action:** The OSM recommendation is **neutral** on the proposal as there is currently no Federal season in the area and Federal public lands are closed to the hunting of moose by all users.

~~~~~  
PROPOSAL 3 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a winter moose season for residents in Unit 18 as follows:

Unit 18, residents only, one bull only, **January 1-5, 2010.**

Current Federal Regulation:

Unit 18, that portion east of a line from the mouth of the Isahkowiik River to the closet point of Dall Lake, then to the easternmost point of Takslesluk Lake, then along the Kuskokwim River Drainage boundary to the Unit 18 boarder and north of (and including) the Eek River Drainage.

No Federal open season.

Federal public lands are closed to the

hunting of moose by all users.

Is a similar issue being addressed by the Federal Subsistence Board? No, however a proposal to establish community harvest limits in the Kuskokwim portion of Unit 18 will be considered by the Federal Subsistence Board at its May 2010 meeting.

Impact to Federal subsistence users/wildlife: The winter season would provide additional time for subsistence users to hunt moose when conditions are more favorable for snowmachine access.

Federal Position /Recommended Action: The OSM recommendation is **neutral** on the proposal as there is currently no Federal season in the area and Federal public lands are closed to the hunting of moose by all users.

~~~~~

**PROPOSAL 4 - 5 AAC 85.045 (a) (16) Hunting seasons and bag limits for moose.**

Change the hunt area boundary for the registration permit hunt for the Kuskokwim River moose population in Unit 18, as follows:

| Units and Bag Limits | Resident<br>Open Season<br>(Subsistence and<br>General Hunts) | Nonresident<br>Open Season |
|----------------------|---------------------------------------------------------------|----------------------------|
|----------------------|---------------------------------------------------------------|----------------------------|

(16)

Unit 18 **Kuskokwim Area**, that portion easterly of a line from the mouth of the Ishkowik River to the closest point of Dall Lake then to the easternmost point of Takslesluk Lake **then to Kalgsik Lake and south and east of the north bank of the Johnson River upstream to the north shore of Arhymot Lake** [THEN ALONG THE KUSKOKWIM RIVER DRAINAGE BOUNDARY] to the Unit 18 border and north of and including the Eek River drainage

|                                             |                    |                 |
|---------------------------------------------|--------------------|-----------------|
| 1 antlered bull by registration permit only | Sept. 1 - Sept. 10 | No open season. |
|---------------------------------------------|--------------------|-----------------|

...

Remainder of Unit 18

|                                     |                                         |                    |
|-------------------------------------|-----------------------------------------|--------------------|
| 1 antlered bull per regulatory year | Aug. 10 - Sept. 30<br>Dec. 20 - Jan. 10 | Sept. 1 - Sept. 30 |
|-------------------------------------|-----------------------------------------|--------------------|

**Current Federal Regulation:**

Unit 18, that portion east of a line from the mouth of the Ishkowiik River to the closest point of Dall Lake, then to the easternmost point of Takslesluk Lake, then along the Kuskokwim River drainage boundary to the Unit 18 border and north of (and including) the Eek River drainage. No Federal open season.

*Federal public lands are closed to the hunting of moose by all users.*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes, a similar proposal to make the same boundary changes has been submitted to the Federal Subsistence Board.

**Impact to Federal subsistence users/wildlife:** The change in hunt area would redefine portions of the western boundary to the north bank of the Johnson River at Kalgsik Lake and then along the north bank of the river upstream to the Unit 18/19 boundary line in the area between Kalskag and Paimiut. These changes make the hunt area more discernable to subsistence hunters in the field in an area where geographic landmarks are often confusing. This change would also help to separate the management of the Kuskokwim and Yukon moose stocks.

**Federal Position /Recommended Action:** The OSM recommendation is **neutral** on the proposal. However, if the BOG adopts this proposal it is likely that OSM will recommend that the Federal Subsistence Board support the proposal submitted this regulatory cycle.

**Rationale:** If the Board supports this proposal, the geographic descriptions for hunt areas in the Unit would differ between the State and Federal regulations. However a similar proposal will be considered by the Federal Subsistence Board in May 2010.

~~~~~

PROPOSAL 5 - 5 AAC 85.045(a)(16) Hunting seasons and bag limits for moose.
Change the hunt area boundary and extend the season for moose hunting in the Lower Yukon Area of Game Management Unit 18, as follows:

Resident	
Open Season	
(Subsistence and	Nonresident

Units and Bag Limits

General Hunts)

Open Season

(16)

...

Unit 18 Lower Yukon Area,
that portion north and west
of the Kashunuk River including
the north bank from the mouth
of the river upstream to the old
village of Chakaktolik, west of a
line from Chakaktolik to
Mountain Village.

[OF A LINE FROM CAPE
ROMANZOF TO KUSILVAK MT. TO
MOUNTAIN VILLAGE] and exclud-
ing all Yukon River drainages
upriver from Mountain Village.
[HOWEVER, PORTIONS OF THIS
AREA MAY BE CLOSED BY
EMERGENCY ORDER TO THE
TAKING OF CALVES]

1 antlered bull; or
1 moose

Aug. 10 - Sept. 30
Dec. 20 – **Feb. 28** [JAN. 20]

Sept. 1 - Sept. 30

Remainder of Unit 18

1 antlered bull per regulatory year

Aug. 10 - Sept. 30
Dec. 20 - Jan. 10

Sept. 1 - Sept. 30

Current Federal Regulation:

Unit 18, that portion north and west of a
line from Cape Romanzof to Kusilvak
Mountain to Mountain Village, and
excluding all Yukon River drainages
upriver from Mountain Village—1 antlered
bull

Aug. 10–Sept. 30

Unit 18, that portion north and west of a
line from Cape Romanzof to Kusilvak
Mountain to Mountain Village, and
excluding all Yukon River drainages

Dec. 20–Jan. 20

upriver from Mountain Village—1 moose.
The Yukon Delta National Wildlife Refuge
Manager may restrict the harvest to only
antlered bulls after consultation with the
ADF&G.

Is a similar issue being addressed by the Federal Subsistence Board? Yes, a similar
proposal to make the same boundary changes has been submitted to the Federal
Subsistence Board.

Impact to Federal subsistence users/wildlife:

The current southern boundary of the Lower Yukon hunt area is defined as a line from
Cape Romanzof to Kuzilvak Mountain to the community of Mountain Village and this
line crosses broad zones of featureless terrain. It is difficult for subsistence hunters and
law enforcement to determine the geographic area included in the hunt area. A hunt area
boundary that is more easily identifiable by subsistence hunters in the field would be
beneficial.

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

Rationale: If the Board supports this proposal, the geographic descriptions for hunt areas
in the Unit would differ between the State and Federal regulations. However a similar
proposal will be considered by the Federal Subsistence Board in May 2010.

~~~~~  
**PROPOSAL 21 - 5 AAC 92.540(9)(A)(ii). Controlled use areas.** Lengthen the aircraft  
closure dates in the Noatak Controlled Use area as follows:

The Noatak Controlled Use Area is closed for the period **August 15 - September 30**  
[AUGUST 25 – SEPTEMBER 15] to the use of aircraft in any manner either for hunting  
of ungulates, bear, wolf, or wolverine or for transportation of hunters or parts of  
ungulates, bear, wolf, or wolverine except by regularly scheduled flights to communities  
by carriers that normally provides scheduled air service. The Noatak Controlled Use  
Area consists of that portion of Unit 23 in a corridor extending five miles on either side  
of the Noatak River beginning at the mouth of the river and extending upstream to the  
mouth of Sapun Creek.

**Federal Position /Recommended Action:** Refer to comments for **Proposal 22**.

~~~~~  
PROPOSAL 22 - 5 AAC 92.540(9)(A)(ii). Controlled use areas. Lengthen the aircraft
closure period in the Noatak Controlled Use Area as follows:

(A) the Noatak Controlled Use Area:

...

(ii) the area is closed from August **15** [25] through September **30** [15] to the use of aircraft in any manner for big game hunting, including transportation of big game hunters, their hunting gear, or parts of big game; however, this provision does not apply to the transportation of big game hunters, their hunting gear, or parts of big game to and between publicly owned airports;

Current Federal Regulation:

The **Noatak Controlled Use Area** is closed for the period Aug. 25–Sept. 15 to the use of aircraft in any manner either for hunting of an ungulate, bear, wolf, or wolverine, or for transportation of hunters or harvested species. This does not apply to the transportation of hunters or parts of ungulate, bear, wolf, or wolverine by regularly scheduled flights to communities by carriers that normally provide scheduled air service. The Noatak Controlled Use Area consists of that portion of Unit 23 in a corridor extending five miles on either side of the Noatak River beginning at the mouth of the Noatak River, and extending upstream to the mouth of Sapun Creek.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Board has received several proposals addressing this issue during the current call for proposals.

Impact to Federal subsistence users/wildlife: Subsistence hunters who reside in Kotzebue and Noatak will have less competition along the main stem of the Noatak River from commercial operators, their clients, and general hunters who access hunting areas via airplanes

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

Rationale: This proposal was developed through consensus by the Unit 23 User Conflict Working group which includes representatives of Unit 23 Advisory Committees and Regional Advisory Councils, guides, transporters, federal and state agencies, tribal government, native corporations, and the Northwest Arctic Borough and helps to address concerns that OSM has received from Federal subsistence users regarding competition with non-Federally qualified subsistence users in the area.

~~~~~

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

Increase the nonresident bag limit for caribou in Unit 23 as follows:

Nonresidents can shoot **2** [1] caribou bulls per season in Unit 23.

**Current Federal Regulation:**

15 caribou per day; however, cow caribou  
may not be taken May 16–June 30

July 1–June 30

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

**Impact to Federal subsistence users/wildlife:** If an increased bag limit is approved it could cause further user conflicts in the region and result in more cases of wonton waste.

**Federal Position /Recommended Action:** The OSM recommendation is to follow the recommendations of the Unit 23 User Conflict working Group in acting on this proposal.

**Rationale:** This proposal should be vetted through the Unit 23 User Conflict Working Group which includes representatives of Unit 23 Advisory Committees and Regional Advisory Councils, guides, transporters, federal and state agencies, tribal government, native corporations, and the Northwest Arctic Borough prior to the Board taking any action to increase harvest limits for caribou in the region.

~~~~~

PROPOSAL 26 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Increase the nonresident bag limit for caribou in Unit 23 as follows:

Unit 23 caribou bag limit for nonresidents and aliens, 5 [1] caribou total.

Or, the limit could be raised from 1 to 5 caribou in areas designated as "remote" areas of Unit 23. "Remote" might be defined as areas not customarily accessible by boat or foot.

Federal Position /Recommended Action: Refer to comments for **Proposal 25**.

~~~~~

**PROPOSAL 27 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.**

Increase the nonresident bag limit for caribou in Unit 23 as follows:

Unit 23 caribou bag limit for nonresidents, 5 [1] caribou total.

Or, Unit 23 caribou bag limit for nonresidents, 2 [1] caribou total.

**Federal Position /Recommended Action:** Refer to comments for **Proposal 25**.

~~~~~

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

Increase the nonresident bag limit for caribou in Unit 23 as follows:

Unit 23, caribou bag limit for nonresidents, 5 [1] caribou total (1st option).

Unit 23, caribou limit for nonresidents, 2 [1] caribou total (2nd option).

Federal Position /Recommended Action: Refer to comments for **Proposal 25.**

~~~~~  
**PROPOSAL 35 - 5 AAC 99.025. Customary and traditional uses of game populations:** Revise the Amount Necessary for Subsistence for moose in Units 18, 19 and 21.

The Alaska Board of Game is requested to review the existing Amount Necessary for Subsistence (ANS) for moose for Units 18, 19 and 21, based upon the amounts needed for all the communities in this area.

The current ANS for moose in these Units are:

|                                                                   |                                                                       |
|-------------------------------------------------------------------|-----------------------------------------------------------------------|
| Unit 18                                                           | 80 - 100                                                              |
| Unit 19, that portion outside of the Lime Village Management Area | 400 - 700, including 175 -225 in Unit 19(A) and 20 - 24 in Unit 19(B) |
| Unit 19, that portion within the Lime Village Management Area     | 30 - 40                                                               |
| Unit 21                                                           | 600-800                                                               |

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

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

**Rationale:** The Federal Subsistence Management Program does not use Amounts Necessary for Subsistence (ANS). However, the Federal Management Program recommends that the Alaska Board of Game utilize the best available information when making these findings, as they have significant bearing on subsistence users. The OSM has recently contracted for a study of big game harvests to be done in nine Unit 18 communities; it is anticipated that these data (expected due date of February 2011) will be useful in developing an understanding of rural users harvests.


**NATIONAL WILDLIFE FEDERATION®**

Alaska Regional Center  
 750 West Second Avenue, Suite 200  
 Anchorage AK 99501  
 907-339-3900  
 www.nwf.org

Attn: Board of Game Comments  
 Alaska Department of Fish and Game  
 Boards Support Section  
 PO Box 115526  
 FAX 907 465-6094

Re: Comments on Proposals 15 and 23, GMUs 22E and 23

Dear Sirs:

The National Wildlife Federation encourages the BOG to adopt the above-referenced proposals. Adoption of these proposals is the appropriate action to take biologically and politically. It is appropriate biologically as there have not been recent studies in these areas documenting impacts of harvests on brown bear populations which have low densities and low reproductive rates in northern Alaska. It is appropriate politically as brown bears in National Parks and Preserves serve a variety of interests and constituencies other than subsistence, sport hunting or predator reduction which are the management paradigms in much of the rest of the state. Failure to adopt these proposals would likely set up a state-federal confrontation over whether state or federal paradigms were most appropriate in these areas and this confrontation can and should be avoided.

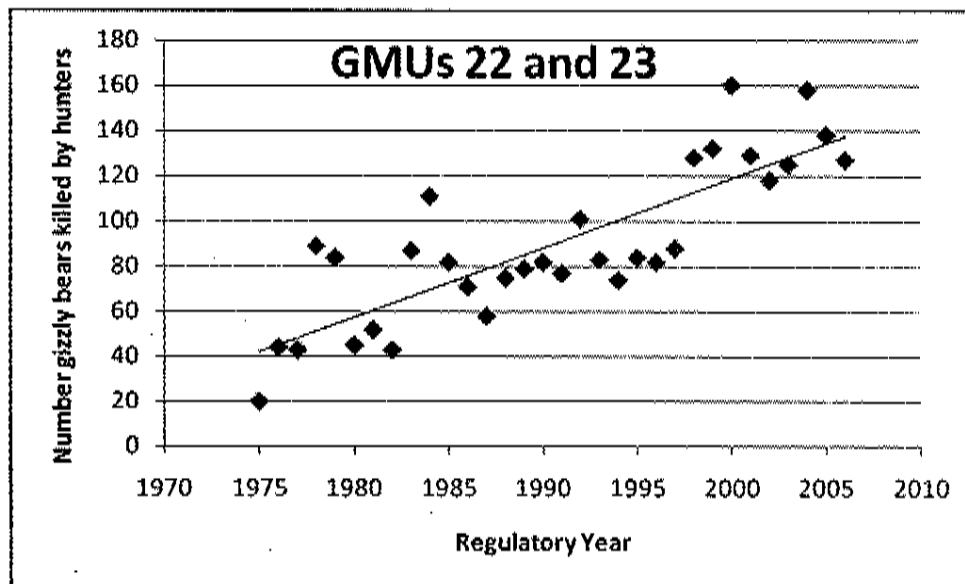
Even absent biological studies in this region subsequent to the work by Ballard et al. (in the 1990s), hunting regulations have been dramatically liberalized in GMUs 22E and 23 as documented in the following table.

| Regulatory year | Subunit 20E   |                     |                       | GMU 23        |                     |                       |
|-----------------|---------------|---------------------|-----------------------|---------------|---------------------|-----------------------|
|                 | Season length | Bag limit (No/year) | Resident tag required | Season length | Bag limit (No/year) | Resident tag required |
| 75/76           | 76            | 1/four              | Yes                   | 76            | 1/four              | Yes                   |
| 85/86           | 1311          | 1/four              | No                    | 80            | 1/four              | No                    |
| 95/96           | 101           | 1/four              | Yes                   | 80            | 1/four              | Yes                   |
| 05/06-present   | 304           | 1/year              | No                    | 304           | 1/year              | No                    |


October 28, 2009

Page 2

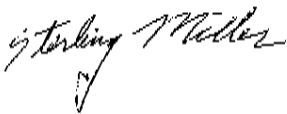
This liberalization in regulations has resulted in a more than 3-fold increase in harvest during the period 1975-2006 as indicated in the following graphic that combines kills in Units 22 and 23. Increases in harvest like this without corresponding studies puts the population at risk of being depleted through excessive harvest.



Thank you for your consideration of these comments.



Jim Adams, Director



Sterling Miller Ph.D.  
Senior Wildlife Biologist, NWF  
ADF&G bear biologist (retired)

NATIONAL RIFLE ASSOCIATION OF AMERICA  
INSTITUTE FOR LEGISLATIVE ACTION  
11250 WAPLES MILL ROAD  
FAIRFAX, VIRGINIA 22030



# NRA

October 27, 2009

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

Dear Board Members:

I am writing on behalf of the millions of National Rifle Association (NRA) members throughout the country to register support for proposals 25, 26, 27 and 28 to be considered during your Fall 2009 Meeting. All of these proposals request that the nonresident bag limit for caribou in GMU 23 be increased to at least two bulls per year. Your approval of this increase is biologically justified and will return lost economic activity and conservation funding to the great State of Alaska.

There can be little question that modestly increasing the nonresident bag limit for caribou is biologically sustainable in light of the current resident bag limits of five per day for Alaskans and 15 per day for those who reside in GMU 23. As hunters know, the successful North American Model of Wildlife Conservation dictates that game laws be justified by sound science, not political considerations.

The startling disparity that exists between the current resident and nonresident caribou bag limits in GMU 23 gives the appearance that politics are at play (discrimination against nonresident hunters). This can cast reasonable doubt on the justification for all of the Board's regulations, ultimately harming public confidence. Proposals 25 through 28 offer the Board an opportunity to address this perception problem.

Prior to 2006, the nonresident limit was five caribou per year. It is reported that claims of misconduct by some nonresident hunters caused the Board to subsequently decrease the limit to one caribou. It is the NRA's contention that an entire class of ethical and responsible hunters should never be punished because of the isolated acts of a few. Instead, the individuals who engage in misconduct should be prosecuted to the full extent of the law. This contention is rooted in basic principles of fairness.

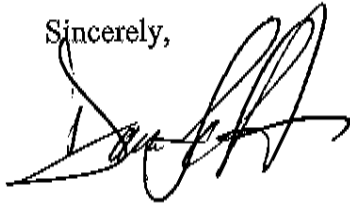
**GMU 23 Proposal Comments****Page 2**

Many NRA members who would rather hunt in the United States have chosen to travel to Canada to hunt caribou because of the more generous bag limits there relative to GMU 23. This diverts much-needed economic stimulus from Alaska. As you know, hunters who visit Alaska spend thousands of dollars on transportation, accommodations, meals and guide services. According to the Association of Fish and Wildlife Agencies, the economic impact of hunting in the state is nearly \$200 million annually and hunters create more than 2,000 jobs. Those who depend on hunter-generated economic activity as a means of making a living have been unnecessarily placed at a competitive disadvantage. Increasing the bag limit in GMU 23 will once again level the playing field for all Alaskans who benefit from hunting tourism.

Finally, it is reported that as much as 80 percent of the Department's annual budget is funded by nonresident hunters. This is something that should generate great pride in all Alaskans. It is evidence that The Last Frontier really is the dream destination of hunters throughout America and the rest of the world. It is also essential in light of Alaska's relatively small population and enormous conservation challenges that result from an expansive geographical area and diverse wildlife populations. In light of this, regulations should encourage, not discourage, nonresident hunter participation where biologically justified.

Thank you for the opportunity to voice the NRA's strong support for proposals 25, 26, 27 and 28. An increase in the nonresident caribou bag limit in GMU 23 to at least two bulls per year presents a win-win opportunity for hunters throughout the United States and all Alaskans.

Sincerely,



Darren LaSorte  
NRA-ILA  
Manager of Hunting Policy

To: Boards Support Section

From: Larry Dalrymple  
907-456-1922

Subject: Comments for the BOG meeting in Nome November 13-16.

## Comments for Fall 2009 BOG meeting in Nome

Proposal #6—Oppose—This area still needs active predator control in order to maintain the population of moose and caribou.

Proposal #8—Oppose—If this proposal were to pass it would be an unenforceable situation. There would be no way to assure the skulls with horns were only being used for handicrafts and not leaving the area intact.

Proposal #9—Oppose—What's next—allowing caribou to be shot from an airplane??

Proposal #10—Support—Would allow more predators to be taken, and a healthier moose population.

Proposal #15—Oppose—Still need to reduce brown bear numbers in Unit 22E.

Proposal #18—Oppose—There is still a need to reduce predators on Unit 23, to allow moose and caribou populations to grow.

Proposal #19—Oppose—This proposal, submitted by the “Unit 23 User Conflict Sorking Group” is laughable, and if passed would open up a real can of worms. If passed, I would submit a similar proposal requiring all hunters from Southcentral Alaska who are now coming up to hunt in the area in GMU 20A that I have hunted for 35 years to attend a class with the same subjects, i.e. the “traditional way of life and the importance of (subsistence) hunting to local residents”, “proper care of meat”, etc. Well, you get the picture. This is just an attempt by a local population to control the increasing number of hunters that are now coming into “their” area to hunt.

Proposal #21—Oppose—Once again, this is just a proposal, submitted by a village council, in an attempt to keep “outside” hunters from hunting in their area.

Proposal #22—Oppose—see #19 and 21 above.

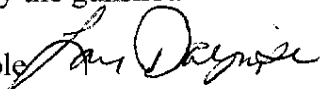
Proposal #23—Oppose—There is a healthy population of brown bear in GMU 23, and they need to be reduced in number in order to ensure healthy moose and caribou populations.

Proposal #27—Oppose—There is no biological justification to increase the non-resident bag limit for caribou to 5, other than to line the pockets of Transporters and outfitters.

Proposal #28—Oppose—see #27 above.

Proposal #29—Oppose—Wolf populations in GMU 26A must still be reduced.

Proposal 34—Oppose—This is a not so veiled attempt to allow villagers to slaughter caribou and leave them lay in the field. In my 50 years of hunting I have never taken an animal that I could not use at least 95% of. The 5% left in the field was usually bloodshot meat, caused by the gunshot.

Larry Dalrymple   
907-456-1922



*Native Village of Goodnews Bay  
P.O. Box 138  
Goodnews Bay Ak, 99589  
(907) 967-8929 phone  
(907) 967-8330 fax*

**FAX TRANSMITTAL  
COVER SHEET**

|                                                |                         |                                       |                           |
|------------------------------------------------|-------------------------|---------------------------------------|---------------------------|
| NAME:<br><i>Kristy Tibbles, Exec. Dir.</i>     |                         | FIRM:<br><i>Board Support Section</i> |                           |
| DATE:<br><i>10/21/09</i>                       | FAX:<br><i>465.6094</i> | PHONE:                                | PAGES + cover<br><i>3</i> |
| SUBJECT: <i>Support letter for Proposal #1</i> |                         |                                       |                           |

FROM:

Peter Julius

Bessie Galila

Judith Merritt

Alice Julius

Karin Merritt

\_\_\_\_\_

MESSAGE:

*Please pass to appropriate person for their consideration - hard copy is being mailed.*

NATIVE VILLAGE OF GOODNEWS BAY  
TRADITIONAL VILLAGE COUNCIL  
P.O. BOX 138  
GOODNEWS BAY, ALASKA 99589

PHONE NO. 907-967-8929 FAX NO. 907-967-8330  
E-MAIL ADDRESS: GOODNEWS907@GMAIL.COM

October 21, 2009

Cliff Judkins, Chairman  
Alaska Board of Game  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

RE: Support letter for Proposal 1- 5AAC85.045 Season and bag limits for Moose

Dear Mr. Judkins,

This letter is to support Proposal #1 within your booklet published recently, page one within Unit 18-Bethel Area.

The current moose hunt for Unit 18, the Goodnews River Drainage and south to the Unit 18 boundary is one antlered bull by state registration; open season is August 25- September 20 with a quota of ten.

The residents of Goodnews Bay and Platinum have abided to all the rules and regulations that have been imposed upon us by both Federal and State governments, including moratorium to build up the moose population in Goodnews River drainage.

The reasoning behind our proposal to change moose season and bag limit in our area is that we have found within these past two years since it opened, most of the moose are further uplands early on of the season, away from the river and are inaccessible for most hunters. Most of the moose start coming down to the river by mid September. September 1-30 season would be more accommodating.

With the gas and oil being so high in rural communities across the State, the residents of both Goodnews Bay and Platinum cannot keep going everyday hoping that a moose would be close by the river. Also, with the quota of only ten (10) moose, we feel like we are being forced to compete against each other, try to catch a moose before the quota is all caught by other hunters. Those families that didn't catch a moose are being left out.

As you may be aware of everything in rural communities are expensive and families that did not catch a moose have been and will continue to have a hard time making the ends meet. We would rather hunt without having to worry about the quota and where our next meal will come from and beside the moose population have been steadily growing in Goodnews River area and will continue to do so in coming years.

Our proposal will alleviate some of the pressure we have been facing since you have opened the season for us two years ago and it is our hope that you can accommodate the wishes of residents of Goodnews Bay and Platinum.

Quyana for your consideration.

Sincerely,  
NATIVE VILLAGE OF GOODNEWS BAY  
GEORGE BRIGHT, SR., PRESIDENT

~~\_\_\_\_\_~~  
Peter R. Julius, Tribal Administrator

CC: Togiak National Wildlife Refuge-Dillingham  
Yukon-Kuskokwim Wildlife Refuge-Bethel  
Alaska Department of Fish & Game-Bethel  
Andrew DeValpine-Southwest Region

RECEIVED

OCT 29 2009

Brian Simpson  
P.O. Box 61210  
Fairbanks, AK 99706

BOARDS

10/28/09

Board of Game Comments  
Board Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**Wolf Proposal #6 and Proposal #33**  
**Oppose** these proposals.

According to the harvest data from the ADF&G's Wildlife Harvest Summary 2005-2006, the reported harvest for wolves in unit 22 remains uniform, averaging 28 wolves per year for the entire unit.

This despite the fact that wolves are becoming more plentiful due to the recent influx of caribou into the western portions of game unit 22. Most of unit 22 was traditionally reindeer range with many thriving herds and virtually wolf free. One of the undesirable consequences of the expansion of the caribou migrations (aside from the loss of reindeer) has been the influx of wolves into areas of the unit that had rarely seen these predators for many decades.

The main issue concerning wolves for the BOG should be to focus on how to increase the harvest of wolves before a crisis amongst the remaining moose population due to wolf predation occurs.

Most wolves in unit 22 are harvested by hunters transported by snow machines which are a very inefficient method to make any meaningful dent in their numbers. It is a fact that wolf fur is considered a very valuable resource in the making of winter parkas, but the bigger current issue is to find the viable means to reduce wolf numbers to the level they were before the recent caribou migrations.

One of the proposals's supporting arguments in favor of limiting hunting and trapping opportunity is that the early and later season's fur quality is not prime and wolves should be managed as a "subsistence" resource.

1) The value of moose, caribou and reindeer to subsistence needs is far more important than "prime" wolf fur. Ruffs can be traded for from regions of the state where they naturally and traditionally occur, rather than having a productive region of the state become depopulated of food animals as a consequence of an out of control wolf population increase.

2) Few wolves are harvested in the early fall, and those taken by trophy hunters are such a rarity, that the importance of the trophy and the opportunity to take such a trophy, is far more valuable than the quality of the fur.

3) April is one of the best months for travel in the western Arctic and to restrict hunting and trapping opportunity during this month has no reasonable basis. Most wolf harvests are incidental to other hunting activities and gas is very expensive. The BOG should seek to enhance opportunity and economy for game management and closing the wolf season during April is counter productive.

Spring caribou and bear hunters should continue to have the option to harvest wolves while out in the field. If anything, the BOG should extend the seasons through May and the ADF&G should donate a barrel of gas to the hunter or trapper for each wolf harvested in unit 22.

In a time of economic depression and soaring energy costs, people should not have to lose their primary food sources to an animal that only recently migrated into areas such as the western portions of unit 22.

I have spent a lot of time in the field over the last 20 year period and it is alarming to witness wolves not only coming into the region, but the rate at which they multiply into large packs.

Supporting Data:

Page 7 Wildlife Harvest Summary 2005-2006

**Wolverine Proposal #7**

**Support** this proposal.

Wolverines are increasing in units 22D and 22E, with 6 sealed for both subunits in year 2007 and 5 and 4 respectively in year 2005. The fact that this proposal advocates and increased hunting and trapping season for Wolverines in three subunits of Game Unit 22, there will undoubtedly opposition to it.

I support conservation of all wildlife; reasonable opportunity to enjoy and harvest this resource is not advocating regulations that would endanger the resource. The far western portions of unit 22 experience late winters and extreme weather conditions are common.

The harvest of this animal is very low and as the BOG reviews and has the ability to change regulations every two years, if it appears that Wolverines are being overharvested remedial action can be taken. Opposition to the proposal will be primarily from those who never enter the field in the areas affected by the proposal.

Supporting Data:

Page 7 Furbearer Annual Survey and Inventory 2007/2008

Page 6 Furbearer Annual Survey and Inventory 2007/2008

Page 9 Furbearer Annual Survey and Inventory 2004/2005

**Brown Bear Proposal #10**

**Support** this proposal.

Winter conditions have continued to extend into the spring throughout the Seward Peninsula in recent years. Hunting regulations should be designed to enhance sound management and provide for quality hunting experiences. Lingering shelf sea ice hinders access for spring bear hunting and it is nonsensical to close the season early.

22A has experienced serious problems with the moose population and if extending the bear season would result in a higher harvest it would enhance hunting opportunity for spring bear hunters and help the moose population recover which benefits everyone.

**Moose Drawing Permits Proposal #11**  
**Support** this proposal.

The Guide-Client agreement is key to making a non-resident moose drawing permit system successful. The area covered by DM845 is extremely remote and the issue of non-resident harvest of moose and the manner, planning and logistics on how to care for and transport the ½ ton of edible meat from each moose harvested is of keen concern to the local residents.

The loss of large quantities of edible meat due to a lack of experience or due diligence on the part of outside guides or disinterested transporters will cause serious conflicts with local residents as the BOG has had experience with in adjacent game unit 23.

At a minimum, non-resident applicants for the DM845 drawing moose permits should have in their possession a signed and valid guide-client agreement, as this indicates that there is a responsible and knowledgeable guide who is established in the hunting area and is responsible for dealing with judging the animal to insure it is a legal animal and planning for the care and transport of the edible meat.

Another large problem this proposal will resolve is large booking agencies put in hundreds of applications for drawing permit hunts nationwide. No forethought is given to the potential that there are no host guides available in a given unit with the booking agency. Therefore the hunter who obtains a drawing permit without a signed Guide-Client agreement is unable to use the permit and it decreases the odds of hunters who do have their guide lined up.

This proposal is proactive in sound management which will help avoid most conflicts between non residents and local hunters and residents.

**Brown Bear Proposal #13**  
**Support** this proposal.

**Brown Bear Proposal #15**  
**Oppose** this proposal.

The harvest of brown bears on Bering Land Bridge National Preserve Lands in sub unit 22E is minimal. ANILCA specifically protected sport hunting on Preserve lands, and the National Park Service has ignored ANILCA for the past 29 years in not allowing for guide concessions within the Bering Land Bridge NP with the consequence that all non-Alaska resident American citizens have been denied access to their Federal lands for brown bear hunting.

I am enclosing ADF&G harvest data which illustrates how low the harvest is. My operation is responsible for the majority of bear harvests within unit 22E under the DB690 brown bear drawing permit system and this harvest all occurs on State lands.

Local Villagers take few bears and other resident harvest is also minimal. The bear population in unit 22E is increasing and there is strong local support to increase the bear harvest, not limit it further. It would be beneficial to increase the harvest of bears between Shishmaref and Cape Espenburg and east through the Lane, Pish and Goodhope drainages. The effects of increased predation by bears and wolves should be avoided with

sound management currently and delay until the resources in the unit are damaged or destroyed.

There is a distinct difference between the Organic Act and ANILCA on one hand and more recent "management policies" which do not comply with the original intents of Congress. Park Service Directors and Superintendents have in many instances initiated policy's which are special interest driven and not in compliance with the original intent of the various legislation enacted by Congress or Executive orders.

The current State seasons for brown bear are not set under intensive management and should not be shortened on Preserve lands because of misinterpretation of recent Park management policies. The average age of harvested bears remains static.

Supporting Data:

Page 4 Wildlife Harvest Summary 2005-2006

Page 8 Brown Bear Annual Survey and Inventory 2007/2008

Page 11 Brown Bear Annual Survey and Inventory 2003/2004

Page 262 Brown Bear Management Report 2002 - 2004

Musk Ox **Proposal #16 and Proposal #17**

Support these proposals.

The ADF&G is administering the drawing process for the DX097 musk ox permits with an "up to" 10% of the total allocation. This maximizes the total to 2 permits for non-residents, but does not allow for a minimum number of permits.

There have been several years of ox hunting in sub unit 22E to establish a pattern of harvest, and the total harvest of oxen remains less than what is accepted as an ideal total. The remoteness of the unit and the weather conditions makes it difficult for most out of local area hunters to successfully access the hunt area without the use of outfitting services.

Successful drawing permit applicants are often fail to consider the logistics and expense of hunting their permits before applying for them. Non-resident hunters tend to be prepared for the "sticker" shock of the costs involved of the required travel, licensing and logistical expenses of this hunt and tend not to let their permits go unfilled.

The oxen are controversial amongst local residents and were transplanted to the area with the use of federal funds paid by sportsmen all across the country. Having an opportunity for non-residents to hunt this animal remains minimal and should have at least a 10% minimum floor (or preferably 20%), which can only be achieved by implementing the drawing process to "shall" issue the minimum 10% (or 20%) allocation of permits to non-residents.

If this proposal passes, residents retain 90% (or if the BOG passes the companion proposal #17, 80%) of the DX097 drawing permits, all the Registration RX104 permits, and the local residents retain all the federal permits.

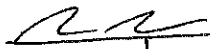
The total annual quota for DX097 and RX104 is 82 oxen of which these proposals are requesting a set aside for a total of 2 (or 4 if proposal #17 also passes) which is a 2.5%, or at most a 5.0% of the total harvest, not including the local federal harvest 100% set aside to residents.

If the total harvest was being met and residents were being deprived of the opportunity to oxen, an argument could be made that non-residents are being allocated too much of the opportunity to hunt. The numbers of available oxen and how they are distributed clearly illustrates that proposals #16 and #17 can be implemented by the BOG without prejudicing resident interests.

Musk ox management goals, at this time, would also be enhanced by these proposals because the percentage of permits resulting in an actual harvest would be increased.

Supporting Data:

Page 5 Musk Ox Annual Survey 2007/2008

  
Signed

Brian Simpson



**Supporting Data for comments on Proposal #6 and Proposal #33:**

Wildlife Harvest Summary 2005/2006 Page #7

Supporting Data: *Comments on: proposal #6 and #33*

**ADF&G – Harvest Summary 2005-2006**

| <u>Species</u>           | <u>GMU</u> | <u>Reported Harvest 2001-02</u> | <u>Reported Harvest 2002-03</u> | <u>Reported Harvest 2003-04</u> | <u>Reported Harvest 2004-05</u> | <u>Reported Harvest 2005-06</u> | <u>5yr Average Harvest</u> |
|--------------------------|------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|----------------------------|
| <b>Sheep (cont.)</b>     |            |                                 |                                 |                                 |                                 |                                 |                            |
|                          | 20         | 141                             | 151                             | 143                             | 132                             | 154                             | 144.2                      |
|                          | 23         | 18                              | 0                               | 1                               | 9                               | 22                              | 10.0                       |
|                          | 24         | 65                              | 19                              | 17                              | 22                              | 24                              | 29.4                       |
|                          | 25         | 97                              | 53                              | 78                              | 59                              | 76                              | 72.6                       |
|                          | 26         | 3                               | 58                              | 75                              | 93                              | 92                              | 64.2                       |
|                          | Unknown    | 0                               | 1                               | 2                               | 1                               | 2                               | 1.2                        |
| <b>Statewide Totals:</b> |            | 872                             | 881                             | 947                             | 945                             | 913                             | 911.6                      |
| <b>Wolf</b>              |            |                                 |                                 |                                 |                                 |                                 |                            |
|                          | 1          | 78                              | 46                              | 49                              | 28                              | 29                              | 46.0                       |
|                          | 2          | 58                              | 104                             | 29                              | 35                              | 57                              | 56.6                       |
|                          | 3          | 51                              | 73                              | 36                              | 41                              | 60                              | 52.2                       |
|                          | 5          | 6                               | 13                              | 5                               | 8                               | 7                               | 7.8                        |
|                          | 6          | 2                               | 4                               |                                 | 7                               | 7                               | 5.0                        |
|                          | 7          | 7                               | 15                              | 3                               | 25                              | 5                               | 11                         |
|                          | 9          | 105                             | 38                              | 115                             | 64                              | 116                             | 87.6                       |
|                          | 10         | 1                               | 2                               | 4                               | 0                               | 4                               | 2.2                        |
|                          | 11         | 22                              | 19                              | 15                              | 15                              | 26                              | 19.4                       |
|                          | 12         | 39                              | 37                              | 25                              | 29                              | 39                              | 33.8                       |
|                          | 13         | 223                             | 137                             | 246                             | 136                             | 145                             | 177.4                      |
|                          | 14         | 21                              | 32                              | 27                              | 31                              | 14                              | 25.0                       |
|                          | 15         | 30                              | 33                              | 42                              | 38                              | 23                              | 33.2                       |
|                          | 16         | 88                              | 47                              | 70                              | 127                             | 60                              | 78.4                       |
|                          | 17         | 91                              | 29                              | 155                             | 60                              | 61                              | 79.2                       |
|                          | 18         | 89                              | 11                              | 82                              | 58                              | 13                              | 50.6                       |
|                          | 19         | 162                             | 123                             | 102                             | 122                             | 134                             | 128.6                      |
|                          | 20         | 309                             | 206                             | 258                             | 266                             | 209                             | 249.6                      |
|                          | 21         | 120                             | 44                              | 37                              | 74                              | 72                              | 69.4                       |
|                          | 22         | 36                              | 32                              | 2                               | 39                              | 29                              | 27.6                       |
|                          | 23         | 45                              | 57                              | 41                              | 97                              | 29                              | 53.8                       |
|                          | 24         | 71                              | 31                              | 3                               | 17                              | 23                              | 29.0                       |
|                          | 25         | 52                              | 32                              | 55                              | 65                              | 48                              | 50.4                       |
|                          | 26         | 25                              | 8                               | 19                              | 10                              | 16                              | 15.6                       |
|                          | Unknown    | 1                               | 10                              | 0                               | 0                               | 0                               | 2.2                        |
| <b>Statewide Totals:</b> |            | 1732                            | 1183                            | 1420                            | 1392                            | 1226                            | 1390.6                     |

Most of these harvest totals do not include unreported harvest which may be substantial and can even exceed the reported harvest for black bear where sealing is not required, or for certain caribou herds. In addition most harvest totals do not include harvest from federal hunts. Information is from the harvest/sealing files posted on 7/31/06 by Information Management. Some of the numbers for caribou and deer are estimated harvest provided by area biologists. The harvest totals for the 2005-2006 regulatory year are considered preliminary.

**Supporting Data for comments on Proposal #7:**

Furbearer Annual Survey and Inventory 2007/2008 Page #7

Furbearer Annual Survey and Inventory 2007/2008 Page #6

Furbearer Annual Survey and Inventory 2004/2005 Page #9

**ACTIVITY 4:** Use public communication and education to obtain better harvest data through increased observance of sealing requirements.

Throughout Region V we communicated with local trappers to improve harvest reporting through the fur sealing process; explained the importance of harvest reporting at public meetings in villages; and prepared newspaper articles explaining the importance of sealing furs to obtain harvest data.

**ACTIVITY 5:** Assess population status and trends utilizing sealing records, track surveys, cache surveys, hunter/trapper interviews and questionnaires, village harvest surveys and observations by staff and the public.

Unit 18: Trapper questionnaires for the previous year (2006-2007) were received and reviewed. We observed furbearers and furbearer sign opportunistically during aerial and ground based work for other species; sent out trapper questionnaires; and continue to interview trappers, pilots, and others regarding furbearers. We have determined there are no furbearer problems related to low populations in Unit 18.

Unit 22: Furbearers are currently plentiful particularly in Units 22A and 22B where hare numbers have been high for a number of years. In Unit 22A lynx are thought to be abundant and stable. In Unit 22B lynx appear to be common throughout the subunit. Lynx are uncommon in Units 22C and 22D and scarce in Unit 22E. River otters are believed to be more common than the low harvest numbers would indicate, but their abundance is unknown. Wolverines are thought to be common throughout the unit and increasing in Units 22D and 22E. In Units 22A, 22B, 22C and 22D beaver continue to be common or abundant with numbers stable or increasing.

Unit 23: Furbearer populations appeared to be within the range of levels observed in previous years based on sealing records, opportunistic observations of furbearers, contacts with hunter and trappers, and community-based harvest assessments. Lynx population levels appear to be stable although their distribution has varied substantially among drainages in recent years. Wolverine numbers appeared to be low throughout Unit 23 during the reporting period.

Unit 26(A): Through opportunistic observations of fur bearers and interviews with local residents, we felt that the current population number of wolverines is fairly high and stable, while arctic and red foxes are both in a period of medium population level. Coyotes are rare and river otter densities are very low. During 14 hours of moose surveys in April of 2008, we observed 5 wolverines, indicating that wolverine densities remain fairly high. The number of wolverines that were sealed was higher than last year (6), but not as high as some previous years. The number of wolverines sealed is probably more an indicator of trapper effort than of wolverine numbers. We saw 5 lynx during moose surveys and 4 were sealed, indicating that lynx numbers may be increasing in Unit 26A.

**ACTIVITY 6:** Prepare unit summaries of furbearer population status and harvest to be included in the Statewide Trapper Questionnaire report.

We provided names and addresses of >100 known hunters/trappers that reside within Region V to assist the Statewide Trapper Questionnaire program. We prepared summary furbearer reports for Units 18, 22, 23, and 26A to be included in the Statewide Trapper Questionnaire distributed to trappers in the region.

## **The Status of Furbearer and Factors Influencing Their Populations in Region V**

### **Regionwide Activities:**

**ACTIVITY 1:** Provide information to State and Federal regulatory processes on furbearer management.

Area management staff reviewed State and Federal regulatory proposals, attended regulatory process meetings, and presented furbearer information to the State Board of Game, State Fish and Game Advisory Committees, Federal Subsistence Board, and Federal Subsistence Regional Advisory Councils.

**ACTIVITY 2:** Maintain the ability in all units to monitor harvests by collecting data through the furbearer sealing process.

The area offices in Barrow, Bethel, Kotzebue and Nome maintained designated fur sealers in villages in each Game Management Unit to collect harvest information through sealing certificates. Staff supported 32 fur sealers in Unit 18, 17 in Unit 22, 6 in Unit 23, and 5 in Unit 26A.

**ACTIVITY 3:** Monitor the harvest through the fur sealing program, fur acquisition reports, annual hunter/trapper questionnaires and community-based harvest surveys conducted annually in selected villages.

Unit 18: We analyzed fur sealing data for the 2007–2008 trapping season but only preliminary harvest figures are available. The reported harvests are 19 river otters, 66 lynx and 16 wolverine. We expect that harvests will be consistent with recent years.

Unit 22: The preliminary harvest report on 2007-2008 sealing certificates included 32 lynx: 13 taken in Unit 22A, 15 in Unit 22B, and no lynx in Units 22C, 22D and 22E. The total reported river otter harvest was 14 otters: 1 from Unit 22A, 8 from Unit 22B, 4 from 22C, 1 from Unit 22D, and 0 from Unit 22E. Thirty-two (32) wolverines were sealed in Unit 22: 8 from Unit 22A, 6 from Unit 22B, 6 from Unit 22C, 6 from Unit 22D, and 6 from Unit 22E. (Note that community based harvest assessment surveys were not completed in Unit 22 due to sampling effort directed to Unit 23 during the reporting period).

Unit 23: We monitored harvests through the fur sealing program, fur acquisition reports, annual hunter/trapper questionnaires and community-based harvest assessment surveys in three communities (Deering, Kivalina, Noatak). Sealing information for 2007-2008 was not available at the time this report was prepared.

Unit 26(A): We examined sealing certificates for wolverine and lynx. During 2007-2008, 11 wolverine were harvested and sealed by 3 Unit 26A residents. Ten were male and 1 was female. Six were ground shot and 5 were trapped. Snow machines were used for transportation in all cases. Two wolverines were harvested in November, 1 in January, 2 in February, and 6 in March. Four lynx were harvested and sealed by one Unit 26A resident trapper. Two males and 2 females were sealed. The trapper used a snow machine for transportation and snared all of the lynx in March.

## **The Status of Furbearer and Factors Influencing Their Populations in Region V**

### **Regionwide Activities**

**Activity:** Maintain the ability in all units to monitor harvests by collecting data through the furbearer sealing process.

The area offices in Barrow, Bethel, Kotzebue and Nome maintained staff throughout villages in each Game Management Unit to collect harvest information through sealing certificates.

**Activity:** Monitor the harvest through the fur sealing program, fur acquisition reports, annual hunter/trapper questionnaires and community-based harvest surveys conducted annually in selected villages.

Unit 18: We analyzed fur sealing data for the 2004–2005 trapping season, but only preliminary harvest figures are available, including 56 lynx, 305 otters, and 4 wolverines. In 2003–2004 sealing certificates revealed 72 lynx, 330 otters, and 32 wolverines were harvested. Within the department, we commented that fur acquisition reports are poorly maintained and provide little useful information to area management staff. Trapper questionnaires for 2003–2004 were received and reviewed.

Unit 22: Harvest reported on 2004–2005 sealing certificates included 99 lynx—51 taken in Unit 22A, 44 in Unit 22B, 4 in Unit 22C, and no lynx in Units 22D and 22E. The total reported river otter harvest was 8 otters—3 from Unit 22A, 1 from Unit 22B, 3 from Unit 22C, and 1 from Unit 22D. Forty-five (45) wolverines were sealed in Unit 22—16 from Unit 22A, 12 from Unit 22B, 8 from Unit 22C, 5 from Unit 22D and 4 from Unit 22E. Community-based Harvest Assessment surveys were completed in Koyuk and Unalakleet, and we found additional wolverine harvest: 3 in Koyuk and 4 in Unalakleet. Sealing of beaver is no longer required in Unit 22, so we do not have harvest data for this species.

Unit 23: We monitored harvests through the fur sealing program, fur acquisition reports, annual hunter/trapper questionnaires and Community-based Harvest Assessment surveys.

Unit 26(A): We examined sealing certificates for wolverines taken in Unit 26A. Seven wolverines were sealed, of which 6 were males, and 1 was a female. Six were ground shot, while 1 was trapped. Snowmachines were used for transportation in all 7 cases. One wolverine was harvested in November, 1 in February, and 5 in March. Four lynx were harvested from Unit 26A, 1 male and 3 females. Snowmachines were used to harvest 3 lynx and an ATV for 1. Three were ground shot, while 1 was trapped.

**Activity:** Use public communication and education to obtain better harvest data through increased observance of sealing requirements.

Throughout Region V we communicated with local trappers to improve harvest reporting through the fur sealing process; explained the importance of harvest reporting at public meetings in villages; and prepared newspaper articles explaining the importance of sealing furs to obtain harvest data.

Unit 18: In Russian Mission we provided information regarding harvest reporting.

**Supporting Data for comments on Proposal #15:**

Wildlife Harvest Summary 2005/2006 Page #4

Brown Bear Annual Survey and Inventory 2007/2008 Page #8

Brown Bear Annual Survey and Inventory 2003/2004 Page #11

Brown Bear Management Report 2002/2004 Page #262

**ADF&G – Harvest Summary 2005-2006**

| <u>Species</u>           | <u>GMU</u> | <u>Reported Harvest 2001-02</u> | <u>Reported Harvest 2002-03</u> | <u>Reported Harvest 2003-04</u> | <u>Reported Harvest 2004-05</u> | <u>Reported Harvest 2005-06</u> | <u>5yr Average Harvest</u> |
|--------------------------|------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|----------------------------|
| <b>Bear (Cont.)</b>      |            |                                 |                                 |                                 |                                 |                                 |                            |
|                          | 9          | 682                             | 18                              | 634                             | 28                              | 651                             | 402.6                      |
|                          | 10         | 8                               | 10                              | 13                              | 10                              | 9                               | 10.0                       |
|                          | 11         | 10                              | 11                              | 15                              | 24                              | 18                              | 15.6                       |
|                          | 12         | 18                              | 12                              | 8                               | 23                              | 22                              | 16.6                       |
|                          | 13         | 119                             | 132                             | 120                             | 141                             | 135                             | 129.4                      |
|                          | 14         | 21                              | 20                              | 26                              | 14                              | 22                              | 20.6                       |
|                          | 15         | 12                              | 14                              | 9                               | 9                               | 9                               | 10.6                       |
|                          | 16         | 88                              | 70                              | 91                              | 126                             | 126                             | 100.2                      |
|                          | 17         | 93                              | 101                             | 105                             | 86                              | 119                             | 100.8                      |
|                          | 18         | 8                               | 14                              | 17                              | 38                              | 23                              | 20.0                       |
|                          | 19         | 83                              | 75                              | 78                              | 80                              | 79                              | 79.0                       |
|                          | 20         | 48                              | 55                              | 46                              | 74                              | 61                              | 56.8                       |
|                          | 21         | 19                              | 7                               | 4                               | 16                              | 19                              | 13.0                       |
|                          | 22         | 84                              | 71                              | 88                              | 89                              | 89                              | 84.2                       |
|                          | 23         | 47                              | 39                              | 42                              | 71                              | 49                              | 49.6                       |
|                          | 24         | 15                              | 11                              | 15                              | 10                              | 14                              | 13.0                       |
|                          | 25         | 20                              | 34                              | 27                              | 32                              | 31                              | 28.8                       |
|                          | 26         | 42                              | 28                              | 30                              | 32                              | 19                              | 30.2                       |
|                          | Unknown    | 1                               | 0                               | 0                               | 0                               | 1                               | 0.4                        |
| <b>Statewide Totals:</b> |            | 1867                            | 1130                            | 1903                            | 1389                            | 1980                            | 1653.8                     |
| <b>Caribou</b>           |            |                                 |                                 |                                 |                                 |                                 |                            |
| Adak                     |            | 23                              | 31                              | 48                              | 27                              | 118                             | 49.4                       |
| Alaska Peninsula North   |            | 165                             | 118                             | 212                             | 113                             | 4                               | 122.4                      |
| Alaska Peninsula South   |            | 116                             | 100                             | 80                              | 87                              | 76                              | 91.8                       |
| Beaver Mountains         |            | 2                               | 10                              | 4                               | 2                               | 1                               | 3.8                        |
| Central Arctic           |            | 764                             | 760                             | 311                             | 625                             | 687                             | 629.4                      |
| Chisana                  |            | 0                               | 0                               | 0                               | 0                               | 1                               | 0.2                        |
| Delta                    |            | 33                              | 37                              | 33                              | 46                              | 37                              | 37.2                       |
| Farewell/Big River       |            | 31                              | 35                              | 16                              | 12                              | 4                               | 19.6                       |
| Forty Mile               |            | 679                             | 898                             | 718                             | 873                             | 745                             | 782.6                      |
| Fox River                |            | 2                               | 1                               | 1                               | 0                               | 0                               | 0.8                        |
| Galena Mountain          |            | 0                               | 1                               |                                 | 0                               | 0                               | 0.25                       |
| Kenai Mountains          |            | 23                              | 21                              | 22                              | 19                              | 19                              | 20.8                       |
| Killy River              |            | 53                              | 46                              | 17                              | 12                              | 3                               | 26.2                       |
| Kodiak                   |            | 0                               | 0                               | 0                               | 0                               | 17                              | 3.4                        |
| Kuskokwim Mountains      |            | 2                               | 0                               | 0                               | 0                               | 0                               | 0.4                        |
| Macomb                   |            | 42                              | 26                              | 29                              | 7                               | 16                              | 24.0                       |
| Mentasta                 |            | 0                               | 0                               | 0                               | 1                               | 0                               | 0.2                        |
| Mulchatna                |            | 9319                            | 5043                            | 2592                            | 2299                            | 2175                            | 4285.6                     |

Most of these harvest totals do not include unreported harvest which may be substantial and can even exceed the reported harvest for black bear where sealing is not required, or for certain caribou herds. In addition most harvest totals do not include harvest from federal hunts. Information is from the harvest/sealing files posted on 7/31/06 by Information Management. Some of the numbers for caribou and deer are estimated harvest provided by area biologists. The harvest totals for the 2005-2006 regulatory year are considered preliminary.



Unit 23: No brown bears were reported taken under the subsistence brown bear registration hunt (RB700) in Unit 23 during this period.

Unit 26A: One brown bear was reported taken under the subsistence brown bear registration hunt (RB697) in Unit 26A during this period.

ACTIVITY 5: Use public education programs and/or increased communication with the public to improve understanding of hunting regulations and the value of conserving brown bear populations, and to obtain better harvest data through increased harvest reporting.

Unit 18: We addressed bear conservation education in Unit 18 through opportunistic interviews with hunters, village police officers, berry pickers, and other interested members of the public.

Unit 22: At Advisory Committee, Regional Advisory Council meetings, and during individual contacts with local residents we discussed bear hunting regulations, the importance of harvest reporting, DLP bears, and methods to minimize human-bear conflicts.

Unit 23: We spoke to the public about the importance of reporting all bears killed while hunting or in defense of life and property.

Unit 26A: At public meetings and during individual contacts with local residents, we discussed bear hunting regulations, the importance of reporting harvest and DLP bears, and methods to minimize human-bear conflicts.

ACTIVITY 6: Collect data, determine sex, and extract a tooth for aging from brown bears presented for sealing.

Unit 18: Four female and 15 male bears were reported harvested in Unit 18. Teeth were extracted for aging when these bears were presented for sealing.

Unit 22: Data was collected from 76 brown bears (51 males, 23 females and 2 of unknown sex) taken in Unit 22 during the reporting period. Teeth were extracted for aging when these bears were presented for sealing.

Unit 23: Teeth were extracted at the time of sealing from all bears taken during the reporting period for aging.

Unit 26A: All bears were sealed outside the unit where other staff collected data and teeth.

ACTIVITY 7: Obtain estimates of ages of sealed bears by tooth sectioning.

Unit 18: Premolars were extracted and sent to Matson's Lab for sectioning and aging but results for these samples are not available.

Unit 22: Age information for bears taken during this reporting period was not available at the time of this report. The mean age of all bears taken in Unit 22 was 6.7 yrs for each of the last 2 regulatory years. The previous 10-year average age for bears harvested in Unit 22 is 6.2 years.

Unit 23: Age information for bears taken during this reporting period was not available at the time of this report. The average age of all bears taken in Unit 23 during 2001-2002 through 2005-2006 was 7 yrs (7 yrs for males and 6 yrs for females).

Kotzebue and there were 30 males, 11 females and 1 bear of unknown sex. in the harvest. In Unit 26A, all bears were sealed outside the unit where other staff collected data and teeth; there were 11 males and 4 females in the harvest.

Activity 7: Obtain estimates of ages of sealed bears by tooth sectioning.

Unit 18. Premolars from 15 bears harvested in 2003-2004 were extracted and sent to Matson's Lab for sectioning and aging and results for these samples are not available. Results from teeth of 12 bears harvested in 2002-2003 show an average age was 8.75 years and range in age from 2 to 26 years.

Unit 22. Premolars from 85 bears harvested in 2003-2004 were extracted and sent to Matson's Lab for sectioning and aging but results for these samples are not available. Results from teeth of 80 bears harvested in 2002-2003 show an average age was 6.4 years and range in age from 1 to 27 years. Since record-keeping began in 1967, the average age of bears harvested in Unit 22 has been 6.5 years.

Unit 23. Premolars from 42 bears harvested in 2003-2004 were extracted and sent to Matson's Lab for sectioning and aging but results for these samples are not available. Results from teeth of 25 bears harvested in 2002-2003 show a median age of 7.5 years and range from 2 to 28 years. The median age of all male bears taken and aged in Unit 23 since 1961 has been 7 years.

Unit 26A. Premolars from at least 14 bears harvested in 2003-2004 were extracted and sent to Matson's Lab for sectioning and aging but results for these samples are not available. In 2002-2003 14 bears were harvested and 13 were aged, showing an average age of 7.8 years, with ages ranging from 2 to 21 years

Activity 8: Communicate and coordinate with local residents to reduce bear/human problems, improve understanding of defense of life or property (DLP) situations, and reduce need for DLP kills.

Unit 18. We installed an electric fence at a fish camp near St. Marys along the Andreafsky River as a demonstration project to reduce human-bear conflicts. This project yielded ample evidence for the efficacy of this tool and the village participant in the demonstration project has been a strong, and vocal, proponent of using electric fences to reduce bear problems.

Unit 22. During the reporting period we acquired a solar-operated electric fence to loan to the public experiencing problems with brown bears. The fence was set up at a seasonal fish camp on a river approximately 70 miles east of Nome, and it proved to be a very effective bear deterrent. We used public service announcements on the radio and in newspapers to emphasize awareness of bears in the area, the importance of clean camps and not leaving food, dog food, garbage or other attractants unattended or accessible to bears. Copies of the bear safety video, "Staying Safe in Bear Country," are available on loan from the Nome Fish and Game office to interested groups or individuals. The pamphlet "Bear Facts - The Essentials for Traveling in Bear Country" has been distributed throughout Unit 22, and is also available at the Nome Fish and Game office.

# Unit 22 Reported Brown Bear Harvest, 1983-2003

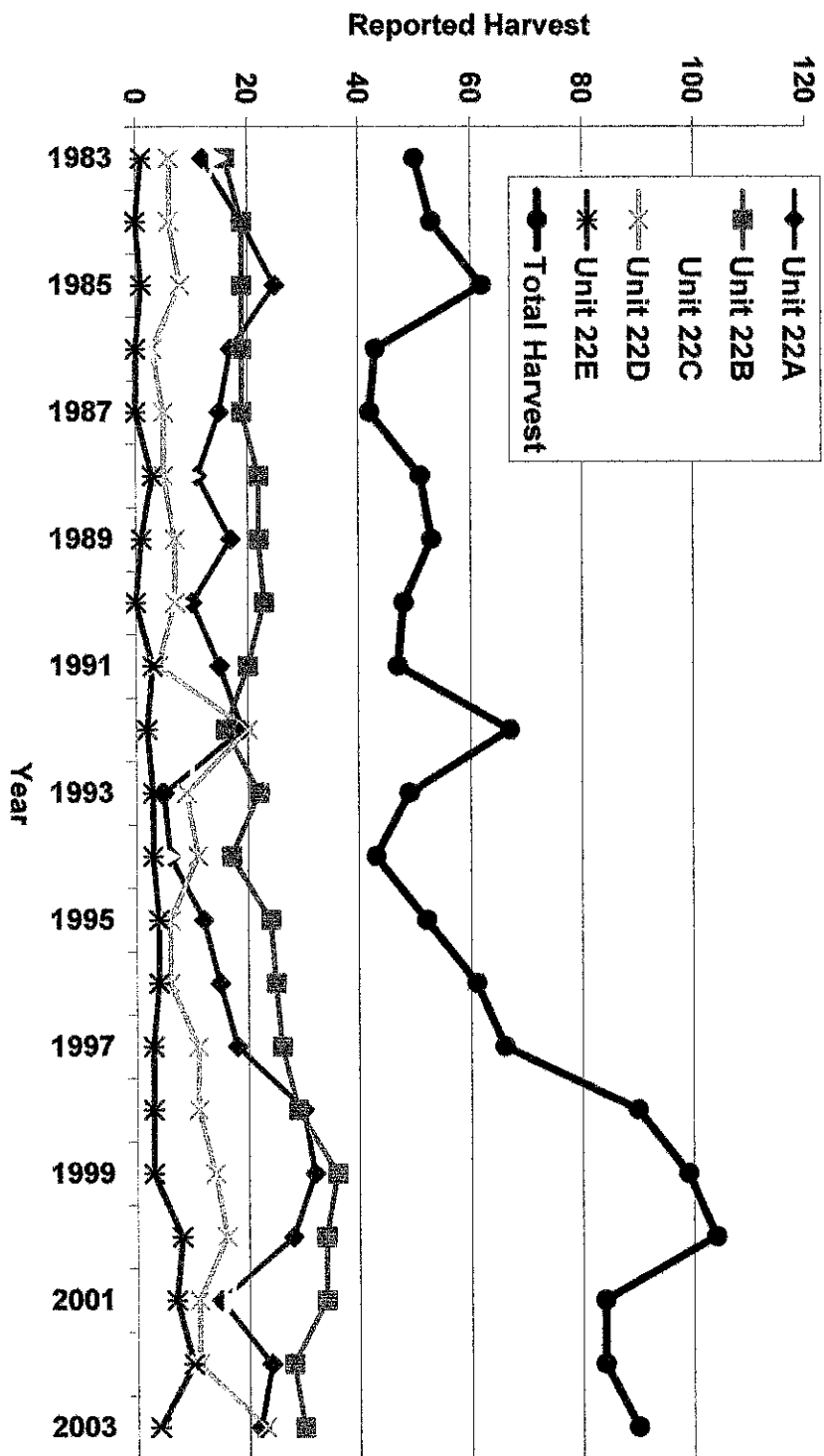


Figure 1 Unit 22 reported brown bear harvest, 1983-2003

**Supporting Data for comments on Proposal #16 and Proposal #17:**

Musk Ox Annual Survey 2007/2008 Page #5

Monitoring of hunts was coordinated with federal staff administering federal subsistence hunts on federal public lands. In combined state and federal hunts in Unit 22B 138% of the harvest quota was filled when the harvest quota of 16 was exceeded by 6 animals (total harvest = 22). In combined state and federal hunts in Unit 22C 69% of the harvest quota was filled, 88% in Unit 22D, and 67% in Unit 23SW.

In Unit 22E we monitored a federal subsistence hunt and a combination of state Tier I subsistence registration and general season drawing hunts. Two of eighteen (2 of 18) federal permits (11%) were filled, 30 of 57 state registration permits (53%) were filled, and 13 of 20 (65%) state drawing permits were filled. In total, 55% of the harvest quota was filled in Unit 22E.

**ACTIVITY 5:** Work with local reindeer herders to identify and minimize conflicts between reindeer and muskoxen in an effort to conserve muskoxen and allow for population growth and expansion.

Activities related to reindeer herding occurred in Units 22 and 23SW. Nome staff provided information for the annual Reindeer Herders Association meeting.

**ACTIVITY 6:** Encourage cooperation and sharing of information among agencies and users of the resource in developing and executing management and research programs.

Nome staff works closely with BLM and NPS staff to coordinate management activities. Staff attended Seward Peninsula Regional Advisory meetings and reported on muskox population status and hunt administration.

**ACTIVITY 7:** Provide orientation for Tier II and drawing permit muskox hunters in Unit 22.

Department staff used in-person and telephone interviews and web-based orientation information on the ADF&G website to provide hunters and the public with muskox identification, sex and age classification and hunting information.

**ACTIVITY 8:** Investigate causes of declining recruitment in portions of the Seward Peninsula using calving surveys and analysis of Nitrogen from urine samples collected from winter range in Unit 22.

No calving surveys were conducted during this reporting period. Urine and fecal samples were collected from muskox groups on winter range during composition surveys in Unit 22C. Analysis is on-going.

### **Units 23NW, and 26A:**

**ACTIVITY 1:** Census muskox and evaluate population sex/age composition at least once every 3 years in Unit 23NW.

We censused muskox in the northwest portion of Unit 23 and westernmost portion of Unit 26A during February, 2008, and observed 324 individuals. This was slightly fewer than in previous years. Opportunistic observations of mixed sex-age groups and solitary bulls in Units 23 and 26A outside of their core range suggest emigration may be starting to limit the growth of this population.

**ACTIVITY 2:** Census and conduct muskox composition surveys annually in eastern Unit 26A (ANWR population).

PROPOSAL 34

RECEIVED  
OCT 23 2009  
BOARDS

OPPOSE

WILL BE MISUSED, WHAT'S TO STOP SOMEONE FROM  
BRINGING OUT THE HIND QUARTERS ONLY AND LEAVING  
THE REST. JUST ON THEIR ASSUMPTION IT WAS DISEASED.

Allen J. Avengei  
P. O. Box 354  
Delta Jct, Alaska  
99737



# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



## BOG Arctic and Western Regions Proposal Comments – Fall 2009

Proposal 9 – 5 AAC 92.085(8)(D) Unlawful methods of taking big game; exceptions

### **OPPOSE**

Hunting opportunity for caribou in Unit 22 is *not* limited by lack of access, as this proposal states. If this proposal were to pass, both resident *and non-resident* hunters would be able to land and shoot caribou during the fall season the same day they have been airborne.

We can find no reasonable justification to allow such a practice.

Proposal 34 – 5 AAC 92.990 (17) Modify definition of edible meat

### **OPPOSE**

We strongly oppose passage of this proposal.

It would allow unethical resident and non-resident hunters to skirt the intent of Alaska's wanton waste law and incompletely salvage the meat of a big game animal by falsely claiming it was somehow diseased.

It would prevent adequate enforcement of Alaska's wanton waste law. Alaska Wildlife Troopers does not have the enforcement personnel or funding to investigate and prove claims of animals not harvested due to disease.

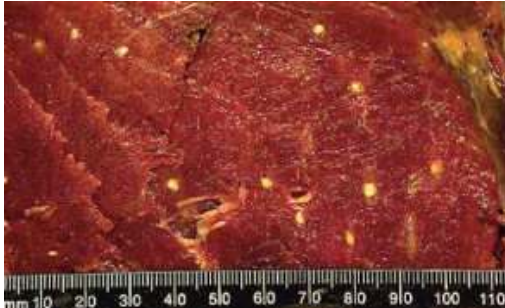
Ethical hunters, who indeed would normally salvage all the edible meat according to the current definition, could be confused (if this proposal were to pass) as to what is truly a disease that would make an animal inedible or pose a risk to humans, resulting in an increase of wanton waste of game meat.

Passage of this proposal could lead to a statewide definition of edible meat that would only compound the above concerns.

AK BHA understands that there are instances where diseased game animals are taken, and that there are some diseases that, while not prevalent, can and do pose a risk to humans. However, most diseases found in game animals don't pose a risk to humans, and

for most of those that do, humans can prevent or eliminate that risk using simple protections like wearing gloves when butchering, and thoroughly cooking the meat.

The *taenia krabbei* muscle cysts pictured below can be common in caribou and moose populations. They do not pose a risk to humans, and the meat from animals with this “disease” can be eaten dried or uncooked.



ADFG Photo

Sometimes, hunters who see these muscle tapeworm cysts incorrectly deem the meat unfit for human consumption, and if this proposal were to pass it would essentially legalize wanton waste of meat that commonly contains the *taenia krabbei* cysts.

Where there are genuine cases of wildlife with a disease such as brucellosis, that can indeed pose a risk to humans, the solution doesn't lie in a blanket allowance to leave all the meat in the field; **the solution lies in educating hunters how to gauge if an animal may be diseased before shooting, and how to protect themselves and their families after the fact if they do shoot a diseased animal.**

AK BHA is frankly skeptical with the wording of this proposal by the Arctic Advisory Committee that alludes that common-sense protections from a wide array of wildlife diseases (such as *Trichinella* and *Tularemia*), such as wearing protective gloves or cooking meat thoroughly, are not real options among the subsistence hunters in northwest Alaska.

Bear meat is known to commonly have the *trichinella spiralis* roundworm, and thanks to education efforts most all hunters know that bear meat must be thoroughly cooked to render it completely safe for human consumption. This proposal, if passed, would make it legal to just leave all bear meat because it is “diseased,” based not on the premise that some hunters *can't* protect themselves, but because those hunters **won't** take adequate precautions when cooking bear meat.

Finally, we want to also address the issue brought up in this proposal of shooting animals because they are believed to be diseased, under the premise of either a “mercy” killing or to prevent spread of that disease. It seems there are contrary arguments within this proposal. On the one hand, this proposal seems to argue that it is difficult if not impossible to always tell if a caribou is diseased, and such a thing is only determined upon butchering. On the other hand, this proposal argues that it is often easy to determine diseased caribou and that tradition dictates those animals should be killed and left there completely unsalvaged. What is the real truth here?

This proposal from the Arctic Advisory Committee goes against everything we believe hunting should stand for, and if passed would not only lead to all the negative



consequences listed earlier, but would further divide within Alaska among groups of hunters. In the words of Selawik elder Daniel Sipahk Foster Sr., *“You don’t play with any of the animals. You don’t kill them and leave them. You must get only what you need.”*

We all must support and adhere to the basic credo of what hunting is really about, and our laws regarding wanton waste must apply to all hunters statewide.

---

Alaska Backcountry Hunters & Anglers  
alaskabha@starband.net

11-26-09

Proposal No. 34

RECEIVED

OCT 29 2009

BOARDS

I appose the change to the definition of inedible meat in the regulation. While I understand the concern, I feel that this change will give "carte blanche" to the "hunters" like the group who left over a hundred animals to rot. I feel that if a hunter feels it necessary to cull an obviously diseased animal, he should have made provisions to transport this animal to a Fish and Game facility where an official decision can be made.

Mary Malcolm  
PO Box 256  
Kellita Pt, Ak  
99737



**Native Village of White Mountain  
IRA TRIBAL COUNCIL  
P.O. Box 84082**

**White Mountain, AK 99784**

**TELEPHONE: (907) 638-3651 & FAX: (907) 638-3652**

August 28, 2009

Chinik Eskimo Community  
P.O. Box 62020  
Golovin, AK 99762

Dear Irene:

The Native Village of White Mountain supports the Chinik Eskimo Community's proposal to the Alaska Department of Fish and Game to changes in the fall moose season for Unit 22B for the last two weeks in September since we may have problems with the river freezing up early in October.

One of the concerns of our community members is that hunters from Nome come in our area during the Labor Day weekend and catching our Remainder of the quota for moose.

The Native Village of White Mountain IRA Council is in full support of this proposal.

Sincerely,

Mary D. Charles Vice President for  
Lincoln M. Simon Sr., President

Non-resident moose allocation for units 22D Remainder and 22E  
Not Numbered

**SUPPORT** this proposal, request the BOG direct the ADF&G to combine both hunt, RM842 and RM853 into one harvest total.

I submitted a proposal with two proposed solutions concerning combining the harvest totals for RM 842 and RM 853 into one total of 20 bulls, instead of the current two separate totals of 10 bulls each.

The BOG Support staff indicated that this request does not require regulatory change, but rather is a request that the BOG give direction to the ADF&G on this proposal and therefore would not assign the proposal a number or place it in the proposal booklet.

There are several distinct moose populations within Unit 22 with varying degrees of abundance. The moose population in sub-unit 22D Remainder and 22E are healthy and the region is remote for access from major population centers in Unit 22. Therefore, you will note that the hunting seasons in both of these sub units are much longer (and except for non-resident harvest) and are managed with a general hunt harvest ticket rather than a registration hunt.

Non-resident moose hunting opportunity is regulated within sub unit 22D Remainder through RM 842 and in sub unit 22E through RM 853. The boundaries of RM 842 include two distinct geographical areas with two distinct moose populations. The moose north of the Imuruk Basin and Tisuk Channel are distinct from the moose south of this natural divide. Both populations are managed under one Registration hunt.

The moose within sub-unit 22E are also largely in two distinct populations, one population amongst the drainages flowing north and west from the continental divide (which is the common border of both sub-units and the two registration hunts in question) and the other population along the main Serpentine River and its' headwaters.

Although RM 853 regulates the entire sub-unit in theory, in fact the northern and eastern portions of the sub-unit are within federal lands and this includes the main Serpentine River moose population. Federal regulations deny non-residents moose hunting opportunity in sub-unit 22E, which limits the area RM853 covers to the moose population adjacent to the moose within 22D Remainder, which together, are one distinct moose population.

The moose population occupying the country north of the Imuruk Basin, including the drainages flowing north and west of the continental divide, are one population which winters in large herds in the middle of 22D Remainder and seasonally disperses north and west throughout 22D Remainder and into the drainages flowing off the continental divide into 22E.

Managing this population with two different Registration hunts with two different harvest totals could well be accomplished with one Registration hunt with one harvest total. Fall hunting season access is very limited and the overall surplus that is available for non-resident hunting would not be increased.

I understand the ADF&G would like to see an increased bull harvest in unit 22E. I do not disagree with the department; rather, the harvest of this population of bull moose that migrate seasonally between both adjacent units is neither increased nor decreased by

this proposal. It addresses the issue of access for the only time of year (Sept 1 to 14) wherein non-residents can harvest moose in both units.

These are very remote areas and the logistical planning and access is very important for both the success of non-resident hunters, but more importantly the successful care and salvage of edible meat and perishable portion of trophies.

If the BOG were to direct the ADF&G and the department were to implement this proposal it would not conflict with the departments' management goals and enhance the logistics of the hunts and care for the resource.

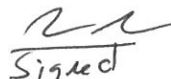
As the primary provider of big game services to non-residents in the region this directive is very important to successful logistical planning and implementation of operations in the area. The moose registration hunts are managed on an emergency closure order basis, and an early closure would be disastrous to hunts in progress in the field. We already plan the number of hunts well below the annual quota limitations.

Your support in enacting this proposal would enhance sound management and quality hunting opportunity within what the BOG and ADF&G have found to be the non-resident allocation of the harvestable surplus.

Supporting Data:

Map of Area

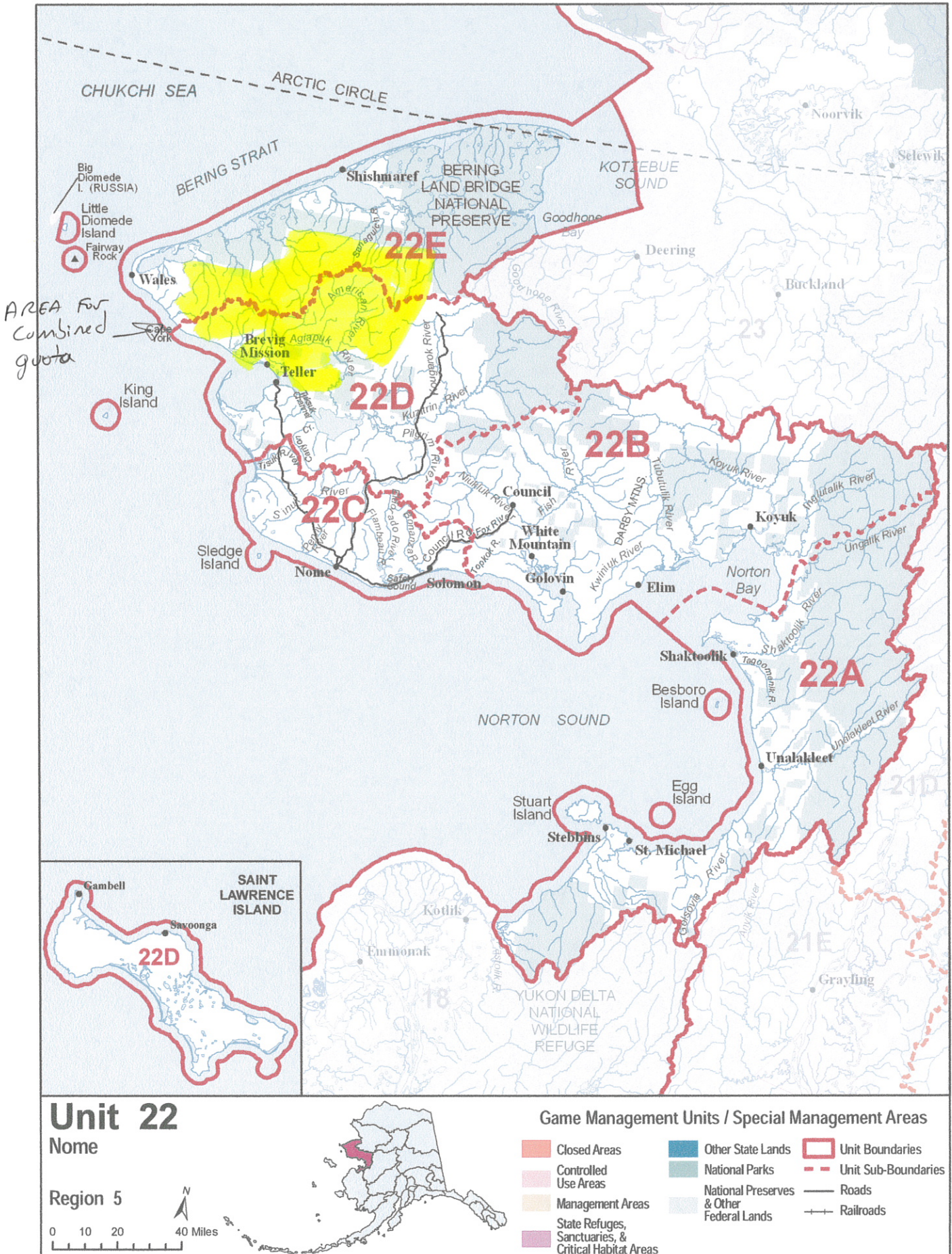
Original copy of the unnumbered proposal

  
Signed  
Dian Simpson

**Supporting Data for comments on the unnumbered proposal concerning non-resident moose allocation in units 22D Remainder and 22E:**

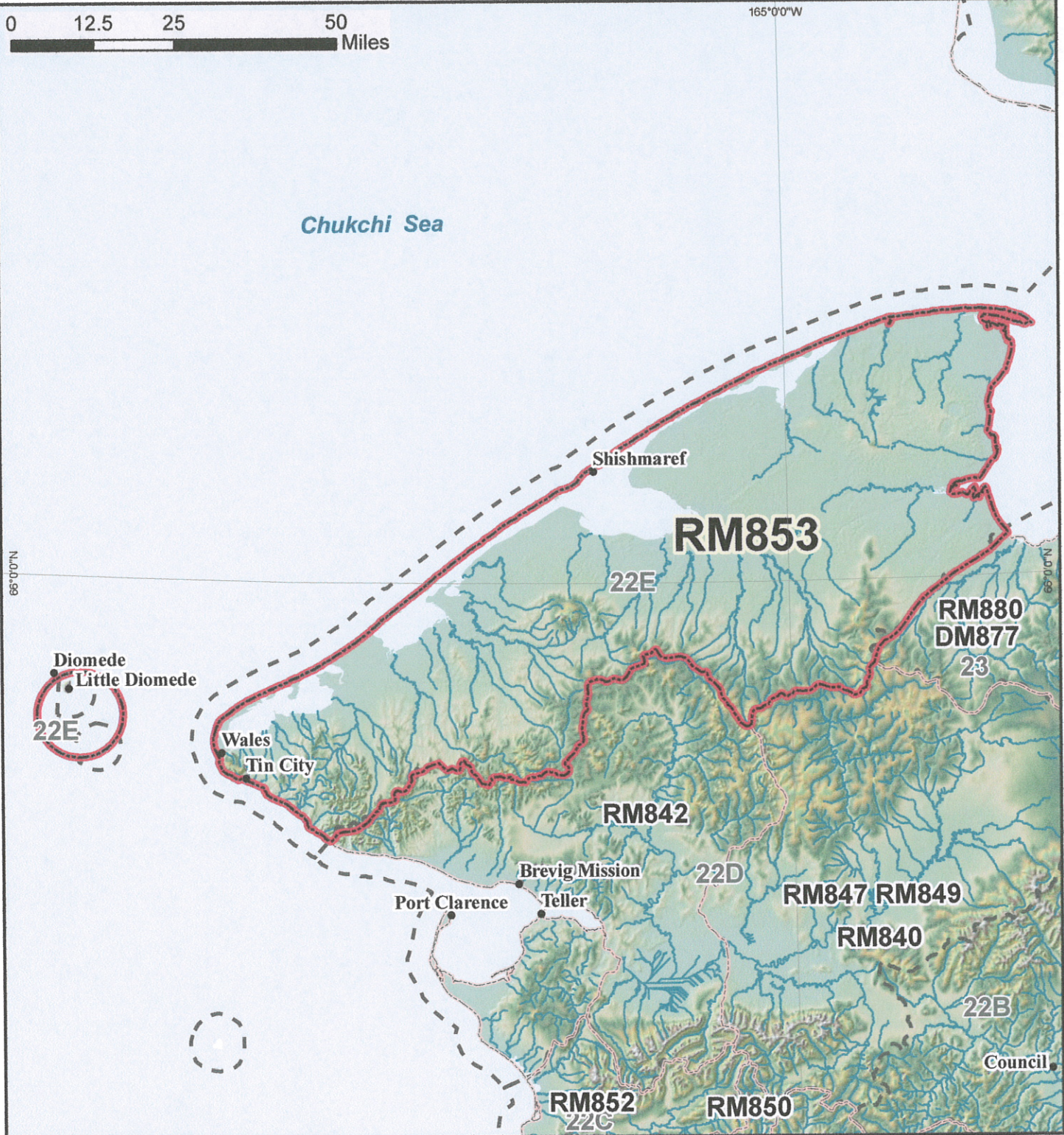
Copy of original proposal

Maps





# RM853 - Moose Registration Permit Hunt



## AREA DESCRIPTION RM853 - Moose - Registration Permit Hunt

HUNT AREA: Unit 22E. Nonresidents only.



Source maps: USGS 1:63,360 Bendeleben, Kotzebue, Shishmaref, Teller

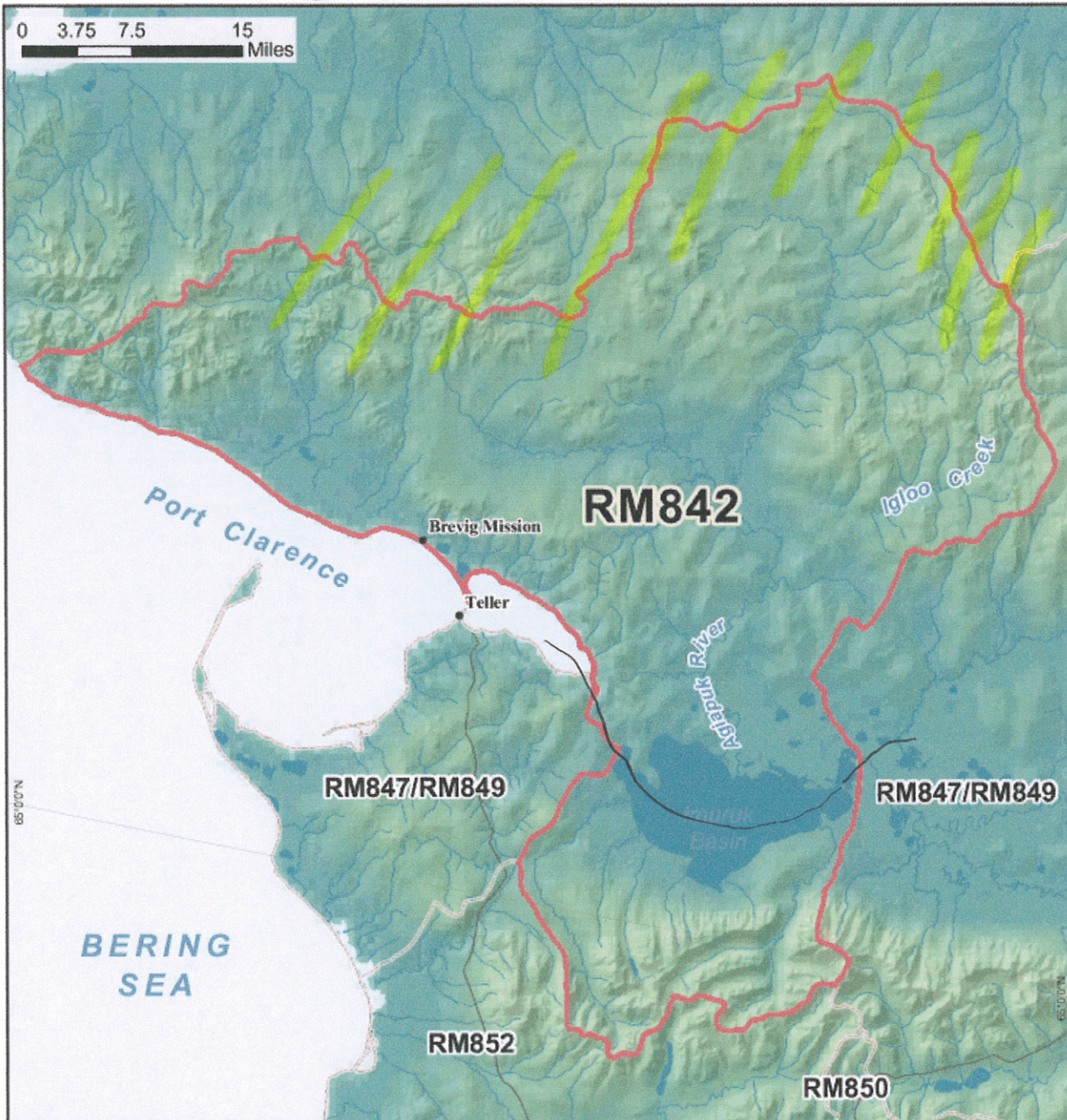




# RM842 - Moose Registration Permit Hunt



0 3.75 7.5 15  
Miles



## AREA DESCRIPTION FOR RM842 - Moose - Registration Permit Hunt

Hunt Area: Remainder of Unit 22D.

Source maps: USGS 1:63,360 Teller, Nome

t:\wch\huntarealarcmap\rm842.mxd 08/04 skt; 08/30/05 skt

**BOARD OF GAME  
REGULATION PROPOSAL**

Hunting  
Non-Resident  
Unit 22D Remainder  
and Unit 22E

1) Alaska Administrative Code:                      Regulation booklet page:  
    5AAC 85.045                                              100

2) What is the problem you would like the Board to address?

The non-resident moose allocation for units 22D Remainder and 22E are divided into two separate registration hunts RM842 and RM853 which have identical seasons and harvest limits. The boundary between 22E and 22D Remainder follows the continental divide and these moose tend to travel south during the fall for the rut and form up in wintering herds primarily in unit 22D Remainder and then they tend to disperse all over the area and across the continental divide into state owned lands adjacent to the divide within unit 22E in the summer.

Federal lands within unit 22E are closed to moose hunting by non-residents which covers virtually the remainder of 22E outside the lands managed for non-resident moose hunting under the authority of RM853. The primary moose population in this vast area is concentrated in the Serpentine River drainage and is a separate population.

The area of unit 22E covered by RM853 has very few access points and the terrain is unfavorable in most places to access by small aircraft or riverboat. The actual areas to hunt falls mainly along the continental divide which makes hunting under two different management permits cumbersome at best. The portion within 22E most accessed is the limited portion accessible from the cat trail extending into 22E from the Kougarak Road outside of Federal lands which prohibit the use of ATVs.

Having two separate permits and hunts for the same moose population which tends to be harvested at a higher rate in unit 22D Remainder than unit 22E should either be combined into one hunt with a total harvest equal to the existing harvest maximum, or have each hunts' totals adjusted to allow for a higher harvest in unit 22D Remainder. This total number of ten bulls un-necessarily restricts hunting opportunity in the sub unit of 22D Remainder and exaggerates the need in unit 22E.

3) What will happen if this problem is not solved?

Continued under utilization of this important resource. Non-resident hunting services provide a major economic boost to the local economy. The large "trophy" bulls harvested by non-residents are at their most prime during this time of year and difficult to access by the local residents. The meat and fat from the bulls harvested is carefully cared for and distributed locally for which there is a high demand from families and elders.

Most local hunters from the surrounding villages hunt moose by river access in the fall and snow machine access in the winter. The non-resident season is limited to 1 to 14 September and is concentrated away from areas commonly accessed and hunted by the local communities.

The same animals when harvested after October 1<sup>st</sup> when they are easier and more affordable to access by local hunters tend to be very lean and lack the nutritional quality and fat most sought after in rural areas.

The same moose population is being hunted under two hunt systems and could result in the cancelation of hunts in mid season due to the inflexible nature of the permits' administrative boundaries. These hunts are the culmination of tremendous planning, logistical effort and expense. Every effort is expended to insure that each hunt is viable and not in conflict with best management goals for the resource itself.

4) What solution do you prefer?

This proposal offers two solutions to choose from to solve the problem addressed.

The preferred solution is:

Combine the two existing registration hunts:

**5AAC 85.045                      RM842 Non-resident moose**

Season closed by emergency order when (10) bulls are taken.

**5AAC 85.045                      RM853 Non-resident moose**

Season closed by emergency order when (10) bulls are taken.

Into one registration hunt with a combined harvest limit:

**5AAC 85.045                      RM842 Non-resident moose**

Season closed by emergency order when 20 bulls are taken.

The alternate solution is to maintain the two existing hunts (RM842 in sub unit 22D Remainder and RM853 in unit 22E) and change the total bull harvest limit distribution in the following manner:

**5AAC 85.045                      RM842 Non-resident moose**

Season closed by emergency order when 14 (10) bulls are taken.

**5AAC 85.045                      RM853 Non-resident moose**

Season closed by emergency order when 06 (10) bulls are taken.

5) Does your proposal address improving the quality of the resource harvested or products produced?

This proposal is neutral on the quality of the resource harvested. The antler size restrictions and harvestable surplus issues have already been set in the regulations. This proposal would be greatly beneficial to the products or services produced.

Rural Alaska and the entire US economy is in a difficult period. One industry that remains viable in rural Alaska is the provision of quality hunting services to non-resident hunters. Tremendous effort has been expended to provide quality services in this remote corner of Alaska. The issues of caring for the resource itself, the issues of eliminating user conflicts and addressing subsistence needs, the care of the meat and fat harvested and distributed where it is greatly needed and appreciated have all been worked out. The hunting services industry, when it is practiced in an ethical and viable manner should be protected as a priority, not merely as an after thought.

The main goal of the solutions offered through this proposal is to minimize the potential destructiveness from an emergency closure in the middle of the hunting season due only to administrative boundaries and better distribute the hunting opportunity.

6a) Who is likely to benefit if your solution is adopted?

1. Non-resident hunters, who contribute a disproportionate amount of the funds spent on managing game, would have less chance of their hunt being cancelled in the middle of the season with a more balanced allocation of the harvestable surplus of moose.
2. Hunting service providers would have a more dependable season and not face the potential of a catastrophic economic disaster of a prematurely closed season. This type of disaster would have no conservation based need, merely an administrative regulation driven issue that can be addressed through this solution.
3. The ADF&G hunt manager would have one less hunt to manage and be able to maintain the same management goals for the particular moose population being regulated.


6b) Who is likely to suffer if your solution is adopted?

1. The total harvest would not be increased from the same population if either solution were adopted.
2. User conflicts, which are currently non-existent, would not develop or increase because of the solution proposed as it does not change hunting dates or change modes of access or areas to be hunted.

7) List any other solutions you considered and why you rejected them?

1. Increasing the harvest total in unit 22D Remainder. Rejected because the goal of this proposal is not to increase the overall moose harvest. The goal is to modify the existing regulations to improve the hunting experience for the hunter, improve the business dependability for the service provider and decrease the overall management work load for the local ADF&G.

2. Return non-resident moose hunting in both units to harvest ticket hunts. Although there never was a legitimate justification to create a registration hunt in unit 22D Remainder for non-residents, the purpose of this proposal is to enhance the current regulations and avoid controversial arguments on this subject.

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