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Napaimute Traditional Council Comments to the State Board of Game Regarding Proposed Changes to Game Management Unit 18, 19, & 21 E Boundaries:

Summary:

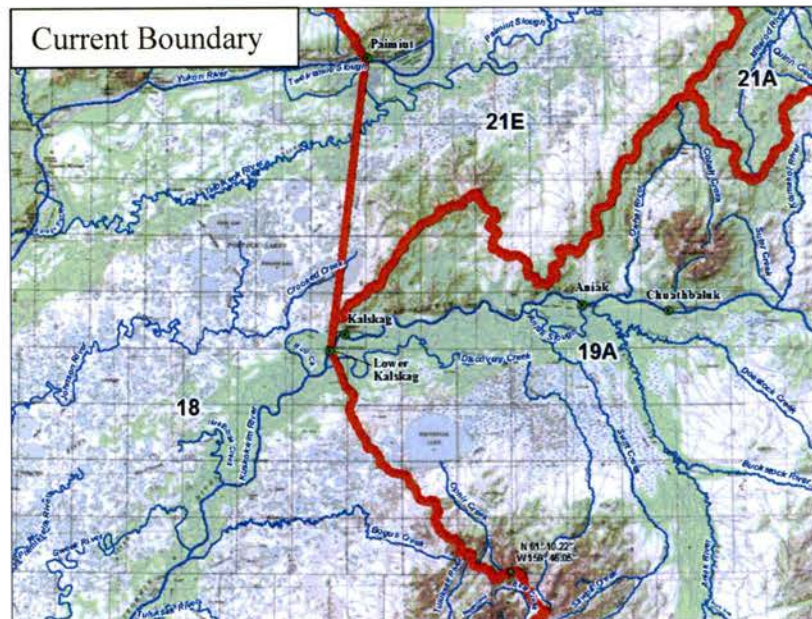
The Napaimute Traditional Council supports Proposal 67 originally submitted by Central Kuskokwim Regional Advisory Committee Member Bob Aloysius (Kalskag) as Proposal 10

Justification:

All of our comments are based on careful consideration of the importance of the September moose season to all residents of the Middle and Lower Kuskokwim and the effect each of the proposed boundaries would have on the hunt. Napaimute's leadership does prioritize the subsistence needs of the full-time Middle Kuskokwim residents in their local area over those from the Lower Kuskokwim who travel into the area to hunt moose for just a short time each year – especially when they have other options for hunting moose such as the Lower Kuskokwim RM615 hunt and the very liberal Lower Yukon hunt.

We also understand the importance of traditional use areas such as Whitefish Lake, Arhymot Lake, and the Johnson River to the People of both the Middle and Lower Kuskokwim.

We are especially mindful that the moose population in the Middle Kuskokwim has been low for the past decade and is still struggling to rebuild.



Current Boundary:

This boundary has worked well for many years in that it allows for residents of the Lower River – particularly People from the Johnson River villages (Nunapitchuk, Kasigluk, Atmauthluak) to hunt the headwaters of their river as well as a portion of the lake that the Johnson River originates from – Arhymot – behind Kalskag. There is some September moose hunting at Arhymot Lake by Kalskag people with ATV and small boat but it is very limited.

In more recent years with the implementation of the Tier II Moose Hunting Permit (RM680) for GMU 19A the current boundary has protected the more important Kalskag traditional use moose hunting areas such as the Old River, Discovery Creek, and Whitefish Lake from being overrun by Lower River hunters as was seen in the 1980’s through early 2000’s.

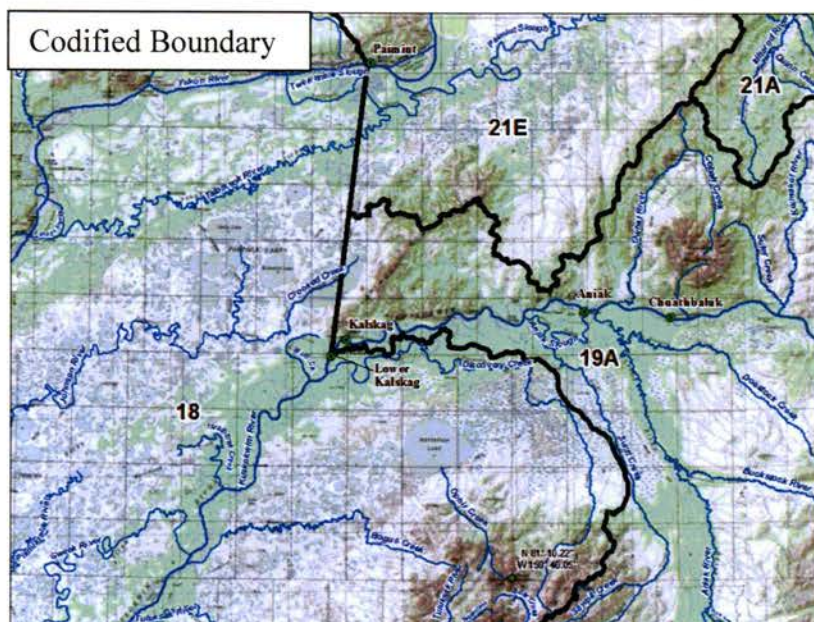
There is still some hunting activity by Lower River hunters in this area (those few that do receive RM680 Permits and some with Federal Permits) but it is not nearly at the level that was seen prior to the implementation of Tier II in GMU 19A.

The main problem with the current boundary is that it has never been clear in 4 locations:

- On the main Kuskokwim near Lower Kalskag (critical during September when the greatest number of hunters use this area)
- West and south of Whitefish Lake (not so critical as little or no September moose hunting takes place west and south of Whitefish Lake)
- Where it crosses Arhymot Lake north of Kalskag because this boundary is not clear going across the Lake; consequently, Lower Kuskokwim September moose hunters have historically hunted the entire lake and its east/northeast drainages in 21E.
- North of Kalskag to the Yukon – critical because this area sees a lot of moose hunting activity during the GMU 18 winter hunt and it abuts GMU 21E where there is no winter hunt on State land.

All People hunting moose during the winter hunt have come to rely on the Paimiut trail as the boundary line for the winter hunt in GMU 18. Everyone perceives that the area west of the Trail is open for the winter hunt and the area east of the Trail is closed – but officially, that is not the case.

Drawing arbitrary straight lines on a map between GMUs makes it hard for even the most ethical hunter to be law-abiding. The lack of clear landmark- based boundaries has led to much self-interpretation with the potential for increased hunting regulation violations.



Codified Boundary:

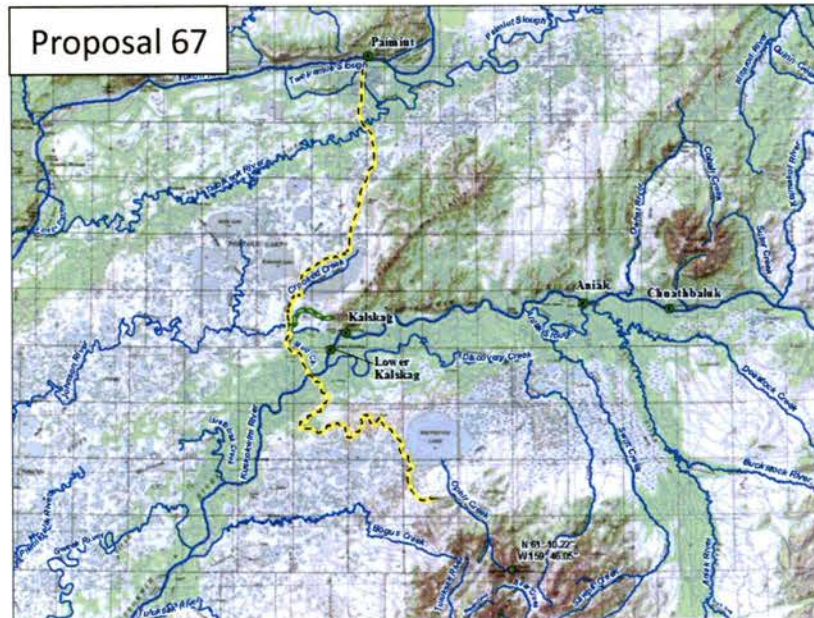
This boundary is completely unacceptable to the residents of the Middle Kuskokwim. It not only continues the confusion over straight-line boundaries, but also intensifies the accessibility of critical Kalskag traditional use areas such as Whitefish Lake and Discovery Creek to September moose hunting by Lower River hunters; something we see as more important.



One of several graves at Whitefish Lake – an almost sacred traditional use area for the Kalskag/Middle Kuskokwim People

We respectfully request that the State Board of Game review the 2010 U.S. Census numbers for the Lower Kuskokwim to gain a clear understanding of the substantial increase in hunting pressure that could be put on the struggling moose population by including these areas in GMU 18. The Lower Kuskokwim population continues to increase at over 2% per year – about 400 more people annually. That’s like adding another village to the region each year.

In addition to the potential for increased hunting pressure on moose in the lower portion of what is currently GMU 19A, the Board must also consider that while moose hunting people often opportunistically take any other fish and game they come upon. We have experienced this in GMU 19A in the years prior to Tier II implementation. It can leave an area depressed of fish and game resources for the local people after the Lower River hunters have departed.



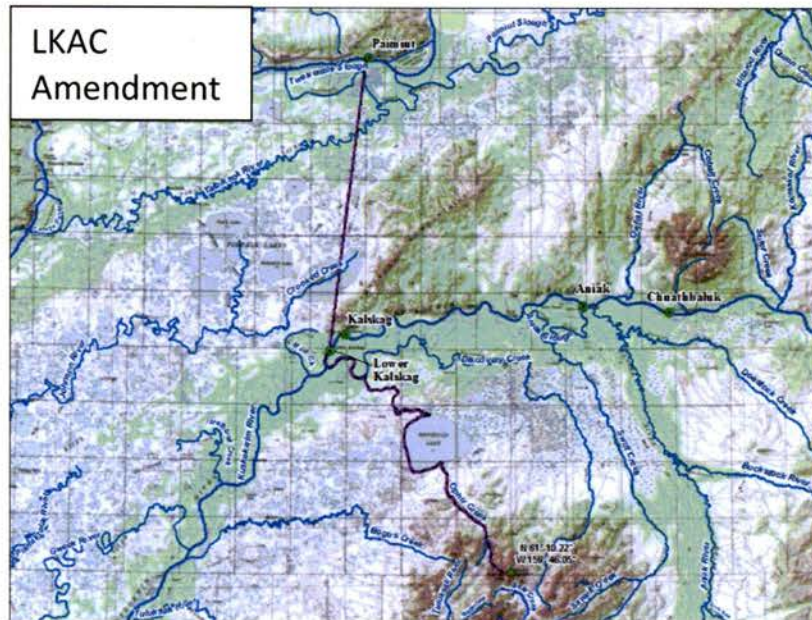
Proposal 67:

This proposed boundary change is the most equitable to both residents of GMU 18 & 19A.

First and foremost is that this proposal greatly clarifies the boundary between the two game management units using local landmarks that are easily recognized and understood by the average subsistence hunter – even if they can’t read the written regulations:

- It crosses the Kuskokwim at one narrow, easily recognizable point between Dick Nash’s (south bank) and Sam Savage’s (north bank) fish camps then follows the north side of the old river channel (where the pre-contact village of Kalskag was located) up to Mud Creek. It then follows Mud Creek up to the well-known historical Kuskokwim terminus of the Yukon/Kuskokwim Portage. It then uses the Johnson River as a boundary up to Arhymot Lake and follows the northern edge of the Lake to the Paimiut Trail. The Paimiut Trail serves as the clear (and already commonly accepted) boundary all the way to the Yukon River and the old village of Paimiut on the north bank.
- Lower Kuskokwim hunters would still be able to hunt the north side of the Johnson River and the north side of Arhymot Lake.
- The Paimiut Trail follows the same route from year to year as it has for generations and is therefore a reliable boundary line.

- The boundary line south of the Kuskokwim follows the ridge of high ground that runs from the Kilbuck Mountains to the river corridor. Although the least utilized portion of the area in question, this part of the boundary is easily recognizable and still allows access to the west side (only) of Whitefish Lake by Lower River hunters.



LKAC Amendment:

We oppose this amendment for the following reasons:

- It does not clarify the very important boundary north of Kalskag between GMU 18, 19A, and 21E. Again it is just a straight line that no one can recognize on the ground as they travel and hunt. Our People can get into trouble over straight-line boundaries.
- This amendment opens up the lower few miles of the Old River, the entire west bank of Whitefish Creek, the entire west half of Whitefish Lake, and the Ophir Creek drainage to hunting pressure from the immense and highly effective Lower River population (they can catch over 100 moose during the first week of September in the Lower Kuskokwim under the RM615 hunt). At this time the struggling moose population in this area cannot withstand any increase in hunting pressure. If anything it needs less hunting or none at all for several more years.

These are the comments submitted to the State Board of Game regarding proposed changes to the boundaries for GMUs 18, 19A, and 21E by the Napaimute Traditional Council.

If you have further questions please feel free to call or email.

Thank you for your consideration.