

**Western Interior Subsistence Regional Advisory Council**

**c/o U.S. Fish and Wildlife Service  
Office of Subsistence Management**

**1011 East Tudor Road, MS 121**

**Anchorage, Alaska 99503**

**Phone: 907-786-3888 or 1-800-478-1456, Fax: 907-786-3898**

**Toll Free: 1-800-478-1456**

RC 035

RAC WI15007.CJ

12 MAR 2015

Mr. Ted Spraker, Chairman  
Board of Game  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The Western Interior Alaska Subsistence Regional Advisory Council (Council) is one of ten Councils formed under the Alaska National Interest Lands Conservation Act (ANILCA). The Council is authorized by Title VIII of ANILCA to provide a forum for expressing opinions and offering recommendations on any matter related to subsistence uses of fish and wildlife within the region.

The Council held a public meeting in Fairbanks on March 3, 2015, to discuss Federal wildlife proposals and other matters related to subsistence in the Western Interior Region. During that meeting, the Council took public testimony on Alaska State Board of Game Proposals 202, 207, and 208 and endorsed the position of the Koyukuk River Advisory Committee (attached). We applaud the Board for providing options in the sheep proposals, addressing the declining sheep population and hunter conflicts. We are in favor of all measures to reduce harvest of the Western Arctic and Teshekpuk Caribou Herds.

*Proposal 202*

The Council endorsed the Koyukuk River Advisory Committee's position on this proposal with additional suggestions to provide more protection for cows at certain times of the year and more for bulls during the rut. Avoiding cow caribou harvest during migration will protect lead cows that guide thousands of caribou to the wintering grounds. Providing for harvest after October 1 is sensible as this is the post-lactation period and the meat is in prime condition. Large bulls killed in rut after October 1 do not fill freezers as the meat is not usable and should be conserved for harvest at other times of the year.

*Proposals 207*

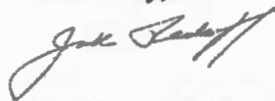
Measure 1 would reduce the use of aircraft and put all hunters on equal footing. With the dwindling sheep populations and very limited number of legal rams available, there is a need to address user conflicts and conserve the resource. Measure 2 would be the easiest to enforce and most equitable to all sheep hunters. In contrast, Measure 3 is not equitable among competing users and would be difficult to enforce.

*Proposal 208*

The Council supports non-resident option 1 and supports option 5 for residents. Options 1-4 require more administrative costs while option 5 is easily enforced, equitable to resident participation, and administratively economical.

Thank you for the opportunity for this Council to assist the Department to meet its charge of protecting our sustainable resources for the maximum benefit of all Alaskans and the opportunity to comment on the Department's proposal for these most important resources. We look forward for continuing discussions about the issues and concerns of subsistence users of the Western Interior Region. If you have questions about this correspondence, please contact me via Melinda Burke, Regional Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456, or (907) 786-3885.

Sincerely,



Jack Reakoff, Chair  
Western Interior Alaska Subsistence Regional  
Advisory Council

cc: Eugene Peltola Jr., Assistant Regional Director, Office of Subsistence Management  
Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management  
Chris McKee, Wildlife Division Chief, Office of Subsistence Management  
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management  
George Pappas, State Liaison, Office of Subsistence Management  
Jennifer Yuhas, Federal Liaison Team Leader, Alaska Department of Fish & Game  
Federal Subsistence Board  
Western Interior Alaska Subsistence Regional Advisory Council  
Administrative Record

### **Koyukuk River AC Comments on Proposal 202:**

We are in favor of all of these measures to reduce harvest of Western Arctic and Teshekpuk caribou. We feel proposal 202 as written has the minimum restrictions to remain within the harvestable surplus of both caribou herds.

We would prefer to see longer cow caribou closures when bulls are better eating (Feb 15-Oct 1). Avoiding cow caribou harvest when Caribou are migrating before Oct. will protect lead cows that lead thousands of caribou to the wintering grounds. Herd deflection away from some communities has been a major user conflict issue. Cow caribou harvested after Oct. 1 are post lactation, and prime meat.

We would prefer to see large Bulls (with shovels) closed after Oct. 1 until they cast their antlers.

Or) Bull caribou with shovels should have trophy value destroyed by cutting the top portion off of the antler after Oct. 1. The top portion of the antler should not be transported from the GMU taken in. Antlerless bulls should become legal in winter, through October 1. Large bulls killed in rut after Oct. 1 do not fill freezers; they fill meat dumps, as they are impalpable. Young bull caribou without shovels should still be available to harvest after Oct.1, as they can be eaten. Bull and cow caribou should be conserved for the proper time of year to harvest.

### **Koyukuk River AC Comments on sheep proposals:**

#### **Proposal 207 to restrict aircraft use for sheep hunting:**

We very much support the concept of further restrictions of aircraft use for dall sheep hunting.

Measure 1. To prohibit the use of aircraft to spot or locate dall sheep during the open hunting season is critical to equitable participation of all sheep hunters. Hunters that have aircraft at their disposal fly all of the hills to locate sheep. If they screw up the first stalk, they fly until they find the rams again and land near by for consecutive hunts until the sheep are taken. With the dwindling sheep populations and very limited number of legal rams available, fair chase hunters have little chance to compete. There are a large percentage of hunters in the sheep survey that feel there is a need to address the combat aspect of sheep hunting today. We are in agreement with hunters that feel there is a need to address the user conflicts.

We feel measure 2 to make it against the law to take or assist some else to take dall sheep until 2 PM of the following day you have been air born, would be the easiest to enforce. It also would be fairest to all sheep hunters, to not allow hunters to take or assist in taking sheep until 2 PM until the following day of flight.

Measure 3, that sets a starting time for 24 hours after being air born is not equitable. Hunters that use air service to access a sheep hunting area do not have any control over when they may be dropped of on a given day. If they are dropped off late on

the previous day they would be at a disadvantage to hunters that are dropped off earlier in the previous day. Or to hunters that have their own aircraft and fly and land earlier the previous day. It would also be problematic to enforce a 24-hour rule. It would be hard for an enforcement officer to know exactly the hour when a hunter had actually flown the previous day.

### **Proposal 208**

#### **We fully support non-resident option number 1.**

Non-resident hunters need to be restricted to drawing permit hunts on State, BLM and private lands that have unlimited guide participation. The drawing hunts for non-residents need to be for the entire season.

The law of supply and demand is causing, and will continue an escalation of dall sheep hunt prices. The unlimited guide use areas will have a lot of pressure during any part of the season that does not limit non-resident participation.

The non-resident drawings should be divided into about 4 ten-day hunt periods during the current Aug. 10 to Sept. 20. This would eliminate all drawn non-residents from competing at one time with other sheep hunters at the beginning of the season.

#### **We fully support option number 5 for residents.**

**Option 5** allows all resident hunters to hunt in any year, within one of the three hunt periods.

This option disseminates the resident competition with non-resident and other resident hunters out over the three hunt periods.

This option has a fair rotation of the resident user group to another hunt period the following year.

Hunters are not eliminated from accompanying a hunting friend with an alphabetically disparate name who is hunting, or vice-a versa.

Options 1-4 require more administrative costs to the Department.

Option number 5's rolling alphabetical participation is easily enforced and equitable to resident participation, and administratively economical.

We applaud the Board for providing options in these sheep proposals, addressing the declining sheep population and sheep hunter conflicts. The BOG requested sheep hunter survey, substantiated the sheep hunter dissatisfaction. High competition of all sheep hunters, especially in areas with unlimited non-resident guide use on State, BLM and private land status has reached a breaking point. The current sheep population decline has resulted in virtually no: 2012, 2013, and 2014 lamb recruitments.

Areas with full extirpation of all adult legal rams that are older than 7-8 years old are approaching a biological breeding ram crisis. Within four years there will be inadequate adult ram numbers to sustain the population. The harvestable surplus within four years will be very limited if any.

It is imperative the Department and the BOG restrict excessive harvest in the unregulated guide areas now. Full extirpation of all legal rams must be reduced in all areas to allow an adequate post hunt reserve of adult rams for breeding during the upcoming adult ram reduction.

In four years, within many areas of Alaska, the ratio of breeding age rams >  $\frac{3}{4}$  curl will be very low, possibly 1-3 adult rams : 100 ewe likes. Moose and caribou populations require adequate bull: cow ratios of 20-30 for moose, and 35-40 for caribou. Healthy breeding male ratios maintain reproductive sustainability. In areas where almost all legal rams are removed the ram population could easily be predominately 1-3 year old rams ( $\frac{1}{4}$  to  $\frac{3}{4}$  curl). It is a known fact sub-7/8 curl rams produce low-grade smaller lambs.

We request the Board to require a biological model development for the adult ram population for at least 5 years forward. This will allow the BOG and ADF&G to anticipate the reproductive failure when the current recruitment failure (2012, 2013, & 2014) enters breeding age. Without ram conservation modeling, ADF&G and the BOG are flying blind biologically. The current cull curl/ both horns broken, or 8 years old regulatory regimes, rely on relatively consistent lamb recruitments into the population.

