

Proposal #33

After discussion with many Nelchina Caribou hunters, both Local Copper Basin Residents and Residents from more urban areas, as well as ADF&G Staff, we ask the board to make one simple amendment to Proposal #33 as follows:

When Nelchina Caribou populations are above the upper end of the Population Objective (40,000 animals) the bag limit will be 2 caribou per person.

The two caribou bag limit is intended to allow ADF&G to reach their harvest objectives without excessive crowding and pressure on the land.

Other issues to consider, some of these were discussed at the Copper Basin AC Meeting. (not necessarily suggested):

- Instructing ADF&G to manage for all harvest in the fall, or, managing for some winter harvest.
- Consider fewer but longer seasons in the Fall or possibly a single season in the winter
- Consider a portion of the Registration Tags be made available in local communities
- Consider a longer season beginning in July to spread out some of the pressure
- Consider allowing hunters to register for two periods at a time to allow for hunters that spend a couple weeks in the field at a time.
- Consider a separate registration hunt that would have longer seasons and possibly higher bag limits; but only be available in communities within the Nelchina Caribou Range to satisfy local traditions.

Proposal #43

After discussion with local residents of the Copper River Basin we have made some revisions to our Proposal #43. We have eliminated the corridor along the highways that would have encompassed mostly Ahtna Lands due to concerns voiced by the public that were worried about a hunt that would be offered with very little access to the general public. There were also valid concerns from Ahtna Leaders that this portion of the hunt may lead to increased trespassing issues. We also decided to leave the GMU 13 season unchanged due to concerns that a longer season would attract extra attention in a time of already high pressure. A longer season could still be considered by the board if it is determined necessary to meet harvest goals. We also determined that, to meet the needs of local hunters, some November Registration permits should be available in local communities. There is a general concern that if all permits are given online that the local communities, with slower internet service will be kept out of highly competitive online registrations. Please Amend the Proposal, in its entirety to read as follows.

Amend Proposal #43 entirely to read:

Amend resident moose hunting seasons in GMU 11 and 13 by eliminating the CSH moose hunt and conditions, and adding a late season any bull registration hunt.

Retain existing moose registration hunt in GMU 11 and moose drawing hunts in GMU 13.

General Season: GMU 11 and 13 retaining existing general seasons and bag limits in each unit, GMU 13: Spike/Fork, 50", 4 Brow Tine, GMU 11: Spike/Fork, 50", 3 Brow Tine.

New Late Season Registration Permit Hunt(s): The late season registration moose hunt(s) will have a bag limit of any bull and run November 15 - 30. Registration Permits will be issued in GMU 13 communities starting November 13. The hunt(s) will be offered in GMU 11 and 13 as follows:

- Remainder of GMU 11. Issue up to 50 permits.
- GMU13A West. Issue up to 20 permits.
- Remainder of GMU13A. Issue up to 50 permits.
- GMU 13B. Issue up to 50 permits.
- GMU 13C. Issue up to 100 permits.
- GMU 13D. Issue up to 100 permits.
- GMU 13E. Issue up to 100 permits.

Hunters should be limited to one late season registration moose permit per season within GMU 11 and 13.

These hunts will provide a reasonable opportunity for subsistence moose hunting for all Alaskan hunters, while eliminating the confusing and burdensome regulations associated with the CSH. General season moose hunts offer subsistence opportunity throughout the state, and have in GMU 11 for many years. They can offer this opportunity again within GMU 13, particularly given recent general season harvest numbers that exceed ANS. Resident subsistence moose hunters will have a priority over non-resident and resident drawing permit hunters. Resident hunters will have a long fall general season, and then another 2 weeks in early winter in the registration hunt to harvest a moose. The resident take through these hunts will more than meet ANS. The extended season will accommodate traditional moose hunting activities, including family oriented hunting opportunity (before school).

The two week November registration hunt offers a "second chance" for those not successful during the general season. This early winter time frame allows for travel into some areas that are normally un-hunted during the fall due to open water (supported by continually high bull:cow ratios in some areas). It also offers family hunting opportunity over the Thanksgiving holiday. While we recognize there will be post-rut concentrations of moose in higher elevations, the limited number of permits for these areas will reduce harassment and keep harvest sustainable.

This proposal moves GMU 13 moose management away from arbitrary subsistence harvest objectives such as 100 any bull moose, and towards a scenario where harvest opportunity can be maximized in direct relation to how many bulls remain after each hunting season. By establishing permit numbers in regulation, this hunt offers sustainability and a hunting opportunity hunters can plan for. We would like to see liberal permit numbers issued in year one. If in 3 years, bull:cow ratios are still above objectives or they are compromised in a specific

area(s), permit numbers can be altered. If there is a demonstrated biological problem earlier, ADF&G can reduce permit numbers. No arbitrary quotas or Emergency Orders are necessary. **High "UP TO" Permit numbers are offered to allow flexibility in times of high moose numbers and annual conditions that may be less than ideal. Some years when freeze up conditions are very poor the entire allowable number of permits may be necessary.**

Conservative registration permit numbers should be set for areas with heavy fall hunting pressure given current bull:cow ratios such as in 13B and the western portion of 13A. Moderate permit numbers can be set for 13C, 13D and 13E considering much of the moose habitat in these areas is inaccessible during the fall and thus lightly hunted. Continually high bull:cow ratios and increasing moose numbers in these areas suggest additional harvest will be sustainable. In the case of 13E there will also be some bulls migrating out of park areas that are otherwise closed to state hunters, becoming available to state subsistence hunters for the first time.

Given existing proxy regulations, late season registration hunters will be able to proxy hunt for others, but only once per season within GMU 13.

Regulations to be amended as follows:

5 AAC 85.045. Hunting seasons and bag limits for moose

(9)

Unit 11, that portion east of the east bank of the Copper River upstream from and including the Slana River drainage

[RESIDENT HUNTERS:

1 BULL PER HARVEST REPORT

BY COMMUNITY HARVEST

PERMIT ONLY; HOWEVER, NO

MORE THAN

100 BULLS THAT DO

NOT MEET ANTLER

RESTRICTIONS FOR

OTHER RESIDENT

HUNTS IN THE SAME

AREA MAY BE TAKEN

IN THE ENTIRE

COMMUNITY HARVEST

AREA DURING THE

AUG. 10 - SEPT. 20

AUG. 10 - SEPT. 20

DEC. 1 - DEC. 31

(SUBSISTENCE HUNT ONLY)

SEASON; OR]

1 bull with
spike-fork antlers
or 50-inch antlers
or antlers
with 3 or more brow
tines on one side,
by registration
permit only

Aug. 20 - Sept 17

NONRESIDENT
HUNTERS:

1 bull with 50-inch
antlers or
antlers with 3 or
more brow tines on
one side, by
registration permit
only

Aug. 20 - Sept. 17

[REMAINDER OF UNIT 11]
[1 BULL PER
HARVEST REPORT BY
COMMUNITY HARVEST
PERMIT
ONLY; HOWEVER, NO
MORE THAN
100 BULLS THAT DO
NOT MEET
ANTLER RESTRICTIONS
FOR OTHER RESIDENT
HUNTS IN THE SAME
AREA MAY BE TAKEN
IN THE ENTIRE
COMMUNITY HARVEST
AREA DURING THE
AUG. 10 - SEPT. 20
SEASON; OR]

AUG. 10 - SEPT. 20

(SUBSISTENCE HUNT ONLY)

DEC. 1 - DEC. 31

(SUBSISTENCE HUNT ONLY)

Resident Hunters:

1 bull with
 spike-fork antlers
 or 50-inch antlers
 or antlers
 with 3 or more brow
 tines on one side; or

Aug. 20 - Sept. 20

1 bull by Registration Permit
Available in Local Communities
Nov 13 - Nov 30
Up to 50 permits may be issued

Nov. 15 – Nov. 30

(11)

Units and Bag Limits
 Unit 13

1 moose per
 regulatory year
 only as follows:

Resident Hunters:
 [1 BULL PER HARVEST
 REPORT
 BY COMMUNITY
 HARVEST PERMIT
 ONLY; HOWEVER, NO
 MORE THAN
 100 BULLS THAT DO
 NOT MEET ANTLER
 RESTRICTIONS FOR
 OTHER RESIDENT
 HUNTS IN THE SAME
 AREA MAY BE TAKEN
 IN THE ENTIRE
 COMMUNITY HARVEST
 AREA DURING THE
 AUG. 10 - SEPT. 20
 SEASON; OR]

AUG. 20 - SEPT. 20

DEC. 1 - DEC. 31

(SUBSISTENCE HUNT ONLY)

1 bull with
 spike-fork antlers
 or 50-inch antlers
 or
 antlers with 4 or
 more brow
 tines on one side;

Sept.1 - Sept. 20

or

**1 bull, by
 registration
 permit only as follows:**

[DEC. 1 - DEC. 31]
Nov. 15 – Nov. 30

**Unit 13A west of the Lake Louise
 Road, Lake Louise, Susitna Lake,
 Tyone Lake, and the Tyone River
 Permits available in Local Communities
 Nov 13- Nov 30
 Up to 20 permits may be issued**

**Unit 13A east of the Lake Louise
 Road, Lake Louise, Susitna Lake,
 Tyone Lake, and the the Tyone River,
 Permits available in Local Communities
 Nov 13- Nov 30
 Up to 50 permits may be issued**

**Unit 13B
 Permits available in Local Communities
 Nov 13- Nov 30
 Up to 50 permits may be issued**

**Unit 13C
 Permits available in Local Communities
 Nov 13- Nov 30
 Up to 100 permits may be issued**

**Remainder of Unit 13D
 Permits available in Local Communities
 Nov 13- Nov 30**

Up to 100 permits may be issued

Unit 13E

Permits available in Local Communities

Nov 13- Nov 30

Up to 100 permits may be issued

1 antlerless moose by drawing permit only; up to 200 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or

Oct. 1 - Oct. 31
Mar. 1 – Mar. 31
(General hunt only)

1 bull moose by drawing permit only; up to 5 permits may be issued;

Sept. 1 – Sept. 20
(General hunt only)

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 150 permits may be issued

Sept. 1 - Sept. 20



Submitted By
Doug Blossom
Submitted On
3/3/2017 6:58:59 PM
Affiliation

Alaska Board of Game

PO Box 115526

Juneau, AK 99811

Chairman Spraker and BOG Members,

Unit 13 is producing a really good surplus of moose and caribou right now for hunters and I would like to see opportunities maintained for all to have fair and reasonable hunting opportunity in this unit. I ask that you keep all user groups in mind when you are deliberating on these proposals. I've hunted Unit 13 over the course of a few different trips and always come away impressed with what a great resource these lands are for Alaskan hunters, fishers, and wildlife viewers. I'm writing to encourage the adoption of proposals that will help keep the wildlife resources of this land in good health and producing animals for the benefit of all users.

The push for this special meeting appears to be coming from the failing CSH hunting system and local Unit 13 users. I understand the claims that there are a lot of hunters in this area and it's impacting local users, but there seems to be under-utilized opportunities for local hunters with the current hunt structure. Last year driving down the Denali Highway from Cantwell – it's well known the first 20 miles or so are private AHTNA lands adjacent to the highway – I saw very little hunting activity in that stretch compared to other areas of the Denali Highway. There is some great looking moose habitat in this stretch. AHTNA also owns lands along the Richardson Highway that are productive moose and caribou areas as well. Additionally, rural residents qualify for subsistence in federal areas in Unit 13, which there is a good amount of B M land in the Tangle lakes area.

Additionally, I request that any changes to the tier 1 system for Unit 13 caribou (and subsequent moose requirements) be postponed until fall 2018 since the registration period for the 2017 hunt closed in December 2016.

Proposals 7, 10-12, & 15 - Support

The referenced proposals all propose similar changes and are proposed by individual users in Unit 13. It is clear by the majority of firsthand accounts and data that the current Unit 13 community hunt system (CSH) is not working. Communities have formed all over the state, mostly to take advantage of the any bull and early season offerings provided with this hunt. There is not enough enforcement to monitor the taking of animals during these hunts and to ensure that all these animals are being reported. Many people are reporting heavy harvest from these groups that may not fully show up in harvest reporting. I hope ADF&G is closely monitoring bull:cow ratios in these areas, as many accounts from hunters in the field seem to indicate that the CSH hunts may be causing a decrease in bull:cow ratios.

Proposals 20 & 21 – Support

Replacing the CSH moose hunt with a tier II hunt makes the most sense to me. Tier II permitting is utilized in Unit 16 where there is a good, harvestable moose population and I don't see why it couldn't be utilized in Unit 13.

Proposal 43 – Support

I support this as a second option to proposals 20 and 21. This is a good proposal that aligns the antler requirements during the general season and adds any bull registration permits later in November with most of the permit offerings along accessible locations that should favor local Unit 13 hunters. This system gives everyone fair opportunity during the general season and provides additional opportunity that favors local Unit 13 users in the later season.

Proposal 32 – Oppose

I recommend the rejection of "eligibility" requirements and scoring for general season and tier 1 hunts. They are not tier II hunts and therefore should not be subject to scoring.

In summary, I support proposals to eliminate the CSH moose hunt and replace it with either a tier II permit hunt or a registration hunt after the general season.



Thank you for the opportunity to comment,

Doug Blossom

Ninilchik, AK



Submitted By
Chris Chartier
Submitted On
11/23/2016 10:19:40 AM
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~~It has come to my attention that you are considering new regulations to for the use and structure of Unit 13 moose and caribou population. There are a number of concerns I have with the management of the game in those units. I primarily hunt in Unit 13 and 20 as a rural resident these are the units closest to me. I would like to see the community harvest for moose come to an end. This hunt has in my opinion evolved beyond its intended purpose and is having a detrimental effect on the moose population in the unit. It is not sustainable or equitable to continue to allow this hunt to exist. My second concern is the rumor that AHTNA has petitioned and requested additional harvest and season to harvest moose in unit 13. AHTNA already has access to some of the best and most fertile hunting grounds in the state, grounds that normal residents like myself have no access to. To allow them additional harvest and separate regulations would be criminal. The board and state constitution should be looking out for the wellbeing and equitable use and opportunity for ALL Alaskan residents.



Submitted By
Joshua Edwards
Submitted On
2/23/2017 10:52:25 AM
Affiliation

OPPOSE: PROPOSAL 32

As is mentioned in proposal 32 "Instead, ***the board needs to require Unit 13 Tier I caribou applicants to demonstrate a subsistence pattern of use consistent with the criteria for identifying customary and traditional uses listed in 5 AAC 99.010(b).***"

racism

[rey-siz-uh m]

noun

1.

a belief or doctrine that inherent differences among the various human racial groups determine cultural or individual achievement, ***usually involving the idea that one's own race is superior and has the right to dominate others*** or that a particular racial group is inferior to the others.

2.

a policy, system of government, etc., based upon or fostering such a doctrine; discrimination.

I have a Native American background, and my grandfather was a trapper by trade, but under these proposed regulation changes, I would not likely be eligible for a tier 1 permit, which would go against equality, and fairness for all Alaskans. If we continue to implement laws which are biased towards one group of people over another, then we have learned nothing from the past. I believe that all men are created equal, and that proposing, and passing laws which require us to be born into a certain way of life in order to reap the benefits of a common harvest, is a sinister racism that should have no part in this land.



Submitted By
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Submitted On
2/22/2017 6:11:01 PM
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PROPOSAL 30 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. I fully support the removal of this hunt and feel the Tier 1 hunt meets the requirements and needs for this.

ROPOSAL 35 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.050(a)(4)(l). Required permit hunt conditions and procedures. I fully support this proposal as well and would like to see the moose hunting requiriment aligning it with the Tier 1 tag removed. This would allow for a decrease in the amount of hunters that are overcrowding Area 13 moose hunting in recent years as a record number of Tier tags have been issued. This proposal would help to restore the moose popultion that has been hit hard by a community hunt and forced over hunting due to moose hunting requirement for unit 13 only.



Submitted By
Kenneth
Submitted On
2/17/2017 6:59:54 PM
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Attached are Alaska Supreme Court decisions on CSH permits, Tier-II permit process, and ADF&G regulations controlling for Caribou and Moose hunting in GMU 13, and affecting all Alaskan subsistence and general permit hunters. Thank you for the opportunity to present comments. Kenneth Manning, 52 years subsistence hunting & fishing; 17 years and on-going in Alaska courts to protect equal subsistence use rights. Kenneth Manning.

"Manning I": Manning v. State ADFG, 161P.3d 1215 (Alaska 2007) Judge Tan Decision

"Manning II": Manning v. State ADFG, Ahtna, 3KN-09-178CI Judge Bauman decision.

Ahtna appeal: *Ahtna v. State ADFG, Manning, AFWCF* (S-13968, S-14297), 288 P.3d 452 (Alaska 2012).

"Manning III": Manning v. State ADFG, Ahtna, 3KN-110-0367CI, Judge Anna Moran decision; appeal: *Manning v. State ADFG, Ahtna*, 355 P.3d 530 (Alaska 2015); Cert 136 S.Ct.1172 194 L.Ed 2d 193 (2016). 2nd appeal on attorney fees, appeal: *Manning v. State ADFG, Ahtna*, S-16461, still pending.

"Manning IV": Manning v. State ADFG, Ahtna, 3KN-13-708CI, Judge Huguelete; appeal *Manning v. State ADFG, Ahtna*, S-16511; still pending.

Respectfully, Kenneth Manning, Feb. 17, 2017



Submitted By
lance maynard
Submitted On
2/26/2017 2:37:30 PM
Affiliation

I strongly oppose all proposals to eliminate the Copper river basin hunts. As a coordinator of one of these community hunting groups I feel that they are a very necessary program. I feel that most people who oppose this subsistence hunt do not fully understand the benefits and intent of the program. Not only do my community members rely heavily on the meat that it provides for us all, but it also gives us a great opportunity to bring our children up with the great tradition of hunting and providing. Just this year both of my children went on successful hunting trips for the first time and got to experience the full harvest of the animals we took along with the whole processing after the hunt. This you may say could be done on any hunt? Not the case, we salvage every usable part of the animal and pass on this tradition to our kids in the way it is intended. Not to mention that this is also a tool to manage the population of animals and herds. I have spoke with many people outside of the community about their feelings toward the subsistence hunt and most don't understand the whole concept. They simply feel that we get all these benefits that they dont. But at the same time say they would never want to go through all the requirements that we do. And also there is nothing stopping these individuals from starting a community of their own if they chose to do so. In conclusion I simply feel this is a great program that has validity and needs to continue. Thank you,

Lance Maynard



Submitted By
Dan Montgomery
Submitted On
3/3/2017 4:59:09 PM
Affiliation

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I oppose proposal 29. There is no conservation concerns with the moose population in unit 13. The total moose harvest in the last 5 years is 3,979 and the total non-resident harvest was 90 moose. That is barely over 2% of the total harvest. The resident harvest has increased 50% in the last three years from 606 in 2013 to 945 in 2015 and 909 in 2016. There is no reason to reduce non-resident permits.

Thank you for your service.

Dan Montgomery



Submitted By
Will
Submitted On
2/22/2017 5:06:28 PM
Affiliation
none

I am concerned with Proposal 44 being against the Alaskan constitution by excluding residents of the state from hunting and fishing opportunities due to their place of residence. I fear that passing this proposal would result in a drastic increase in Native corporations regulating lands and locking them up against non-shareholders.

I also believe that Karen Linnell should refrain from participating in this special meeting due to her conflict of interest as a Board Member and active shareholder of Ahtna, INC.

<http://www.nativefederation.org/wp-content/uploads/2015/01/Resume-Karen-Linnell-01-2015.pdf>

Serve on the Ahtna, Inc. Board of Directors and, formerly served as Chistochina Village Council President, Gulkana Village Council Vice President, Copper River Native Association Vice-President, and Ahtna Heritage Foundation Director

- Ahtna tribal member and longtime participant in cultural revitalization efforts for Ahtna people***
- Sealaska, Kake Tribal Corporation and Ahtna, Incorporated Shareholder***



Submitted By
David Pearson
Submitted On
2/21/2017 9:24:12 AM
Affiliation

Support Proposal Numbers 2,3,4,5,6,7,8,12,11,12,13

While each proposal is different I believe that the community hunt is a poor management practice. So any proposal that removes CM300 is a step in the right direction. AHTNA subsistence communities have a subsistence Federal hunt that provides meaningful preference. The state cannot by constitution provide a preference so any attempt to do so will be mired by the rest of the state. CM300 is not operating as intended and has far reaching consequences remove it and allow the Federal regs to provide the meaning full preference. Commented as a resident of Alaska



unapologetically FOR ALASKAN RESIDENTS

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March 2, 2017

Resident Hunters of Alaska (RHAK)

Comments to Alaska Board of Game

Copper Basin Meeting – Glenallen

March 18 - 21, 2017

Proposal 29 – 5AAC 85.045 Hunting seasons and bag limits for moose.

Close the nonresident moose season in Unit 13

SUPPORT

Resident Hunters of Alaska (RHAK) advocates for all resident hunters, no matter where they live or how or why they hunt. We advocate for resident hunting priorities and the sustainability of our wildlife populations so future generations of Alaskans continue to have hunting & harvest opportunities that carry on our hunting traditions.

RHAK submitted this proposal because we want to continually emphasize our position that when and where resident hunting opportunities may be constrained in any way, if both resident and nonresident hunting is allowed, *the nonresident component should always be the first to be restricted.*

Below is a breakdown of nonresident moose permits issued and harvests in Unit 13 from 2009 – 2016:¹

Table 29-2. Unit 13 nonresident moose permits and harvest, 2009–2016.

Year	Applications Received	Permits Issued	Total Harvest	Total Hunted	Success (Percent)
2009	224	50	12	33	36%
2010	393	110	13	60	22%
2011	428	65	16	35	46%
2012	751	105	9	57	16%
2013	873	105	18	60	30%
2014	905	115	20	69	29%
2015	1,205	115	23	60	38%
2016	517	115	21	58	36%

¹ ADFG graph



In the last three years, an average of 21 moose have been taken by nonresident hunters in Unit 13. During the last 3-year period, an average of 1008 moose have been taken in Unit 13 by residents (all hunts).

Nonresident hunters take on average 2% of the total moose harvest.

That may not seem like much, but every single moose matters in terms of resident Alaskans having the harvest opportunity to fill their freezers and feed their families. The potential opportunity to harvest 21 more moose is significant for those resident hunters and their families.

If the Board believes resident moose hunter needs are not being met in Unit 13, and can't sustainably provide more resident opportunity, the Board should first restrict the nonresident component, no matter that group's harvest percentage.

If the Board decides to do away with the CHS moose hunt, or alter resident opportunity to where it is lessened from where it is now, the nonresident component should first be restricted, no matter that group's harvest percentage.

Thank you for the opportunity to comment.

Resident Hunters of Alaska – info@residenthuntersofalaska.org

www.residenthuntersofalaska.org



General comments:

I believe that Ms. Linnell should recuse herself from voting on all proposals at this meeting. The meeting was specifically called by Ahtna to address the needs of its members (to the detriment of other Alaskans). As a board member of AHTNA, Incorporated, she has a clear conflict of interest. If Ms. Linnell does not recuse herself, I respectfully request that Chairman Spraker forces Ms. Linnell to comply with the Alaska Executive Branch Ethics Act (Alaska Statute 39.52) and disclose sufficient information on the record of her interest as a member of the Ahtna board, and those of her immediate family; I believe that Ms. Linnell's disclosure of conflict of interest would force speaker Spraker to determine that a conflict of interest exists.

I believe that the board should make no changes to the structure of moose and caribou hunting in Unit 13 prior to the start of the 2017/2018 hunting season. Thousands of Alaskans have already applied for, and received hunting permits for the region. Those Alaskans decided which permits to apply for based on the rules established prior to the drawing permit period closing on December 15, 2016. Permits have been issued. Hunt plans have been made. It is not right for the board to change the rules to the benefit of some user groups and not all at this point.

I support the elimination of both the community subsistence moose and community subsistence caribou hunts. As stated by the Anchorage, Matanuska-Susitna, and Denali Advisory Committees, ample opportunity for households to access the moose and caribou of unit 13 exists through state hunting seasons (harvest ticket moose, draw permit moose, Tier 1 caribou, and drawing caribou) and even more liberal federal hunting seasons.

Proposal #1: Modify the amount reasonably necessary for subsistence for moose.

I am opposed to all three stipulations in this proposal. Requesting that the board grant exclusive ability to eight rural communities to be considered "communities" for the purpose of harvesting 100 bull moose that do not meet antler size restrictions is unfair and illegal rural preference.

I am opposed to adopting stipulation number two increasing the ANS for the CSH to reflect the total number of households authorized to participate in the moose hunt. I believe that doing so would result in a much higher ANS finding and would place undo burden on the moose population in the area.

I am opposed to adopting stipulation number three because it again seeks to grant unfair and illegal rural preference.

I believe that Ms. Linnell should recuse herself from voting on this proposal. As a board member of AHTNA, Incorporated, she has a clear conflict of interest due to this proposal being submitted by Ahtna Tene Nene' to promote the interests of AHTNA share holder.

I believe that this proposal seeks to unfairly increase hunting opportunity for rural communities at the expense of urban Alaskans. Residents of the 8 communities identified in this proposal already have access to liberalized hunting seasons for moose and caribou through federal subsistence hunting programs and many also have exclusive access to hunt on 1.7 million acres of AHTNA land.

Proposal #2: Eliminate the community subsistence harvest hunts.



I support this proposal. I agree with point #1 that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

If the board were to cancel this hunt effective January 1, 2017, I believe that the should issue household registered in the community caribou hunt a Tier 1 caribou tag to make up for the lost hunting opportunity.

Proposal #3: Eliminate the community subsistence harvest hunts (moose).

I support this proposal. The Anchorage Fish and Game Advisory Committee clearly points out why a community subsistence hunt is unnecessary for the area. Their suggestion that the any bull surplus go to the draw system for all Alaskans is the most equitable way to approach any surplus bull moose.

Proposal #4: Eliminate the community subsistence harvest hunts (moose and caribou).

I support this proposal. I agree with point #1 that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

If the board were to cancel this hunt effective January 1, 2017, I believe that the should issue household registered in the community caribou hunt a Tier 1 caribou tag to make up for the lost hunting opportunity.

Proposal #5: Eliminate the community subsistence hunts (moose and caribou).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

If the board were to cancel this hunt effective January 1, 2017, I believe that the should issue household registered in the community caribou hunt a Tier 1 caribou tag to make up for the lost hunting opportunity.

Proposal #6: Eliminate the community subsistence hunts (moose and caribou).

I conditionally support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.



If the board were to cancel this hunt effective January 1, 2017, I believe that the should issue household registered in the community caribou hunt a Tier 1 caribou tag to make up for the lost hunting opportunity.

I do not agree with the portion of the proposal that states “go back to regular subsistence hunt tags” as it is unclear as to the author’s intent.

Proposal #7: Eliminate the community subsistence hunts (moose and caribou).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

If the board were to cancel this hunt effective January 1, 2017, I believe that the should issue household registered in the community caribou hunt a Tier 1 caribou tag to make up for the lost hunting opportunity.

Proposal #8: Eliminate the community subsistence hunts (moose).

I support this proposal. It provides for equitable opportunity to hunt moose in the area for all Alaskans without establishing rural preference.

Proposal #9: Eliminate the community subsistence hunts (moose).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

Proposal #10: Eliminate the community subsistence hunts (moose).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

I do not agree with the author’s stated intent of the proposal to reduce competition for local hunters. Competition between rural and urban user groups should not be a concern as local user groups already have access to more liberal hunting seasons and bag limits through federal hunting seasons and exclusive access to 1.7 million acres of AHTNA land.

Proposal #11: Eliminate the community subsistence hunt (moose).



I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

Proposal #12: Eliminate the community subsistence hunt (moose).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

Proposal #13: Eliminate the community subsistence hunt (moose).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

Proposal #14: Eliminate the community subsistence hunt and December registration moose hunt (moose).

I support this proposal as the preferred option for addressing the community moose hunt in Unit 13. The Matanuska-Susitna Fish and Game Advisory Committee clearly addresses why special hunting opportunities such as the community hunt program are not necessary to meet the subsistence needs of federally qualified users in the area. The proposal also identifies why the board should reject the option of transitioning to a Tier II hunt.

Proposal #15 Eliminate the community subsistence hunt (moose).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

I also agree with the author's contention that "subsistence" hunting for communities in the region is not an urgent need. Glennallen is 179 miles (3 hours) from Anchorage. My home in Anchor Point is 207 miles (4 hours). People in this region may prefer to follow subsistence practices, but their location does not demand that they do. I would also prefer to hunt caribou and moose to meet my food needs for the year, but realize that I have ready access to commercial options if I am unsuccessful.

Proposal #16: Eliminate the community subsistence hunt (moose).



I support the proposal to eliminate the community subsistence hunt but do not support this proposal because it contradicts itself by eliminating the hunt entirely and then still listing hunt conditions.

Proposal #17: Change the season dates for the community subsistence hunt (moose).

I conditionally support this proposal. I believe that the community subsistence hunt should be cancelled entirely. However, if the board believes that the community subsistence hunt is necessary I support changing the dates to the November dates proposed for two reasons. First, it affords hunters with a regular harvest ticket a chance to harvest a bull meeting antler restrictions without community hunters (who have more liberal opportunities to harvest a bull moose) harvesting it first before the general season opens. Second, it makes enforcement of antler restrictions easier for state troopers during the general moose season.

Proposal #18: Eliminate the community subsistence hunt or change the season dates (moose).

I support this proposal. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

I conditionally support this proposal. I believe that the community subsistence hunt should be cancelled entirely. However, if the board believes that the community subsistence hunt is necessary I support changing the dates to the November dates proposed for two reasons. First, it affords hunters with a regular harvest ticket a chance to harvest a bull meeting antler restrictions without community hunters (who have more liberal opportunities to harvest a bull moose) harvesting it first before the general season opens. Second, it makes enforcement of antler restrictions easier for state troopers during the general moose season.

Proposal #19: Modify the community subsistence hunt (moose)

I oppose this proposal. I believe that the community moose hunt should be cancelled for the following reasons:

I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

The Anchorage Fish and Game Advisory Committee and Matanuska-Susitna Advisory Committee clearly point out why a community subsistence hunt is unnecessary for the area. Their suggestions that the any bull surplus go to the draw system for all Alaskans is the most equitable way to approach any surplus bull moose.

Proposal #20: Replace the community subsistence harvest hunt for moose with a Tier II moose season.



I oppose this proposal. The Anchorage and Matanuska-Susitna Advisory Committees both clearly explain why additional state subsistence opportunity is not necessary for residents of the communities in this area. Residents in these communities already have access to liberalized hunting seasons and bag limits through federal subsistence hunting programs and exclusive access to 1.7 million acres of land. Furthermore, a Tier II hunt costs extra money to administer because of the extensive review of applications would be required.

Proposal #21: Replace the community subsistence harvest hunt for moose with a Tier II moose season.

I oppose this proposal. The Anchorage and Matanuska-Susitna Advisory Committees both clearly explain why additional state subsistence opportunity is not necessary for residents of the communities in this area. Residents in these communities already have access to liberalized hunting seasons and bag limits through federal subsistence hunting programs and exclusive access to 1.7 million acres of land. Furthermore, a Tier II hunt costs extra money to administer because of the extensive review of applications would be required.

Proposal #22: Eliminate the community subsistence hunt and adopt a resident “any bull” registration hunt”

I oppose this proposal. If the board were to adopt this proposal, I believe that it would result in a wild-west mentality amongst hunters rushing to kill an “any bull” moose before the season was closed by emergency order. I already witness unsafe hunting practices including shooting over the head of other hunters during the moose and caribou season in unit 13, and I don’t believe that encouraging hunters to race to fill and any bull tag before the closure of the season would be safe. I also believe that implementing a registration season such as this would result in excessively difficult management concerns for the department of fish and game. Consider the current 40-mile caribou registration hunt in the road-accessible zones; it is nearly impossible for hunters to know how long the season will be open and fish and game struggles greatly to control take to stay within harvest goals when animals are readily available.

Proposal #23: Eliminate the community subsistence hunt (moose).

I agree with this proposal.

I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

The Anchorage Fish and Game Advisory Committee and Matanuska-Susitna Advisory Committee clearly point out why a community subsistence hunt is unnecessary for the area. Their suggestions that the any bull surplus go to the draw system for all Alaskans is the most equitable way to approach any surplus bull moose.

Proposal #24: Clarify the communities eligible for the “100 any bull” quota and extend the season as follows. (moose)



I am opposed to this proposal.

I believe that Karen Linnell should recuse herself from voting on this proposal as it was submitted by Ahtna Tene Nene' and represents a conflict of interest due to her position on the Ahtna, Incorporated board.

I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

The Anchorage Fish and Game Advisory Committee and Matanuska-Susitna Advisory Committee clearly point out why a community subsistence hunt is unnecessary for the area. Their suggestions that the any bull surplus go to the draw system for all Alaskans is the most equitable way to approach any surplus bull moose.

Identifying eight specific communities with subsistence needs is clearly rural preference, and many of these communities are not that rural. All are connected to the road system, and Glennallen is only 179 miles from Anchorage. Furthermore, all eight communities already have liberalized hunting seasons and bag limits under federal subsistence programs, so no additional preference is needed.

Proposal #25: Eliminate the community subsistence harvest hunt for moose or restrict the hunt area.

I will break this proposal into its three components.

Component 1: The Unit 13 community subsistence hunt should be closed. I agree with this component.

I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

The Anchorage Fish and Game Advisory Committee and Matanuska-Susitna Advisory Committee clearly point out why a community subsistence hunt is unnecessary for the area. Their suggestions that the any bull surplus go to the draw system for all Alaskans is the most equitable way to approach any surplus bull moose.

Component 2: Make hunters that choose between the community hunt and the general harvest ticket hunt. I oppose this component. Enacting this component does nothing to reduce enforcement difficulty of having too many different regulations in place during the hunting season.

Component 3: Restrict participation in the community hunt to occur within 50 miles of the community. I oppose this component. Alaskan wildlife is held in durable public trust for the benefit of all Alaskans. Restricting hunting opportunity due to place of residence unfairly benefits certain rural communities at the expense of the majority of Alaskans. This would be no different than the state only allowing



individuals to drive on public roads within 50 miles of their residence or to fish and berry pick only within 50 miles of a person's residence.

Proposal #26: Change the antler restrictions for the general seasons moose hunt.

I support this proposal. I have personally passed on moose that were probably legal but know many people who have shot sub legal moose. Fortunately, the individuals that I know that have shot sub-legal moose have self-reported and the meat was salvaged. In an area as remote and large as unit 13 with little enforcement presence, I wonder how many sublegal moose are left to rot rather than the individual risking a fine.

Proposal #27: Change the antler restrictions for the general season moose hunt.

I support this proposal. If there is currently a harvestable surplus of moose in unit 13, expanded opportunity will all that surplus to be harvested by all Alaskans. Using liberalized brow tine restrictions instead of liberalized antler width restrictions will make it easier for Alaskans to judge a legal moose.

Proposal #28: Change the antler restrictions for the general seasons moose hunt.

I oppose this proposal. Moose hunting with size restrictions makes little sense whether the antler restriction is 36 or 50 inches. There will always be hunters who inaccurately judge the width of moose antlers prior to harvesting the animal. Once the mistake is made, it is too late for the moose.

Proposal #29: Close the nonresident moose season in Unit 13.

I support this proposal. If communities are not able to meet their ANS needs, opportunity for non-residents needs to be eliminated. If the non-resident hunts were eliminated that would increase the number of moose available to residents to meet their ANS needs.

Proposal #30: Eliminate the community subsistence hunt (caribou).

I conditional support this proposal. Every household that applies for a Tier 1 permit is granted a Tier 1 hunting permit. Tier 1 permits may be proxy-hunted for elder members of the community and youth may participate as well, so the opportunity for inter-generational hunting experiences exists. If the board were to eliminate the community caribou subsistence hunt effective prior to the fall 2017 caribou season, all households registered for the community subsistence hunt should receive a Tier 1 caribou permit to make-up for lost opportunity and allow participation in the hunt.

Proposal #31: Eliminate the community subsistence hunt (caribou).

I conditional support this proposal. Every household that applies for a Tier 1 permit is granted a Tier 1 hunting permit. Tier 1 permits may be proxy-hunted for elder members of the community and youth may participate as well, so the opportunity for inter-generational hunting experiences exists. If the board were to eliminate the community caribou subsistence hunt effective prior to the fall 2017 caribou season, all households registered for the community subsistence hunt should receive a Tier 1 caribou permit to make-up for lost opportunity and allow participation in the hunt.

Proposal #32: Change eligibility criteria for Tier 1 Caribou and moose hunts.



I believe that Karen Linnell should recuse herself from voting on this proposal as it was submitted by Ahtna Tene Nene' and represents a conflict of interest due to her position on the Ahtna, Incorporated board.

I oppose this proposal. Requiring applicants for a Tier 1 caribou permit to complete an application showing reliance on unit 13 for a wide diversity of fish and game resources that provides substantial economic, cultural, social, and nutritional elements of the household's subsistence way of life is burdensome and unnecessary. ADF&G will require additional staff to review this applications. Furthermore, Ahtna Tene Nene' states that the purpose of this proposal is to increase subsistence caribou hunting opportunity. Currently, the quota for the 2016/2017 caribou hunt has not been met. This seems that there is still remaining opportunity for subsistence harvest that is being under-utilized. Additional restrictions to increase subsistence opportunity are not necessary when current subsistence opportunity is under-utilized.

Proposal #33: Change all caribou hunts in unit 13 into a weekly registration hunt.

I oppose this proposal. The Nelchina caribou herd has migrated completely out of the hunt area frequently in recent years, making them inaccessible for the winter hunts starting on October 21. If this regulation were adopted, hunting opportunity could be lost, herd management could be more difficult to achieve, and harvestable surplus could go un-utilized.

Proposal #34: Eliminate community harvest hunt (caribou), increase Tier 1 tags, shorten draw hunt season.

I will break this proposal into three components.

Component 1: Eliminate the community subsistence hunt for caribou. I conditional support this proposal. Every household that applies for a Tier 1 permit is granted a Tier 1 hunting permit. Tier 1 permits may be proxy-hunted for elder members of the community and youth may participate as well, so the opportunity for inter-generational hunting experiences exists. If the board were to eliminate the community caribou subsistence hunt effective prior to the fall 2017 caribou season, all households registered for the community subsistence hunt should receive a Tier 1 caribou permit to make-up for lost opportunity and allow participation in the hunt.

Component 2: Issue all Tier 1 households two caribou permits when the herd population is high. I conditionally support this component. The department has struggled to meet its harvest quota for the Nelchina caribou herd in recent years, and when there is un-utilized harvestable surplus, it makes sense to increase hunting opportunity. I do not support increasing the household limit until after the 2017/2018 hunting season. People applied for the tier 1 and draw tags for the 2017/2018 hunting season knowing that the rules limited their harvest to one caribou per household. Changing those rules now unfairly hurts people who applied for draw hunts.

Component 3: Shorten the draw hunt season. I oppose this component. The Nelchina caribou herd has migrated completely out of the hunt area frequently in recent years, making them inaccessible for the winter hunts starting on October 21. If this regulation were adopted, hunting opportunity could be lost, herd management could be more difficult to achieve, and harvestable surplus could go un-utilized.



Proposal #35: Eliminate the community subsistence moose hunt and remove requirement for Tier 1 caribou hunters to hunt moose in unit 13.

I support the elimination of the community subsistence moose hunt. I agree with point #1 made by the Copper Basin Fish and Game Advisory Committee that enforcement of wildlife rules and regulations is made more difficult by having so many different rules in place for one hunting area.

I also agree that increased hunting pressure in the area is detrimental to the condition of areas near the highway and have seen increased pressure on fishing and ptarmigan during hunting season.

The Anchorage Fish and Game Advisory Committee and Matanuska-Susitna Advisory Committee clearly point out why a community subsistence hunt is unnecessary for the area. Their suggestions that the any bull surplus go to the draw system for all Alaskans is the most equitable way to approach any surplus bull moose.

I conditional support the removal of the requirement for Tier 1 caribou hunters to hunt moose in unit 13, as long it takes effect after the 2017/2018 hunting season. I applied for a drawing caribou permit because I was cognizant of the amount of time I would have available to hunt moose in unit 13 during the 2017/2018 hunting season, and felt that my best opportunity to harvest a moose was to have hunting opportunities outside the unit. If the regulations would have allowed me to choose a Tier 1 permit without hunting moose in unit 13, I would have done that. Doing so would have saved me money on my draw hunt application and would have increased my household's hunting opportunity as either my wife or myself could have harvested a caribou in unit 13 instead of being limited to a single, non-transferrable caribou tag.

Proposal #36: Increase the community caribou harvest bag limit and clarify the communities eligible for receiving the 300 caribou.

I believe that Karen Linnell should recuse herself from voting on this proposal as it was submitted by Ahtna Tene Nene' and represents a conflict of interest due to her position on the Ahtna, Incorporated board.

I break this proposal into three components.

Component 1: Increase the community caribou harvest bag limit. I conditionally support this proposal. I support that two caribou per household is a more reasonable number of caribou for subsistence use than one. I believe that this change should take effect after the 2017/2018 hunting season. People have already chosen which hunt best suits their needs for 2017/2018 under existing rules. Changing permit conditions and bag limits to result in increased opportunity for some user groups, not all is unfair.

Component 2: Clarify the communities eligible to receive 300 community harvest caribou. I oppose this component. The eight communities represented by Ahtna Tene Nene' in this proposal already have federal subsistence hunting opportunities. The state granting them exclusive hunting opportunities represents an illegal and unfair rural preference.

Component 3: Extend the fall hunting season by 10 days. I conditionally support this component. I believe that additional hunting opportunity should be afforded in years when there is a harvestable surplus; I believe that this 10 day extension season should only be for cow caribou to ensure that



caribou harvested are not rutting bulls. Harvesting bulls after September 20 presents too much risk for inedible meat.

Proposal 37: Lengthen caribou season, increase winter bag limit, establish a youth hunting season.

I conditionally support all three of these proposals, as long as they are adopted after the 2017/2018 hunting season. I agree with the author's contention that unsafe hunting conditions frequently occur along the Denali Highway. I have frequently witnessed hunters shooting over other hunters towards distant caribou. Spreading out hunter competition by lengthening the season would help with this. I also agree with increasing hunter participation through youth hunts.

Proposal 38: Eliminate the caribou drawing tag, and the requirement for Tier 1 hunters to hunt moose in unit 13.

I conditionally support this proposal, as long as they are adopted after the 2017/2018 hunting season. I believe doing so would reduce pressure on moose in unit 13. I believe that this would allow equal opportunity for all Alaskans to access the Nelchina herd. I believe that changing the hunt conditions now would be an unfair advantage to hunters who chose the Tier 1 caribou tag for the 2017/2018 season. I applied for a drawing caribou permit because I was cognizant of the amount of time I would have available to hunt moose in unit 13 during the 2017/2018 hunting season, and felt that my best opportunity to harvest a moose was to have hunting opportunities outside the unit. If the regulations would have allowed me to choose a Tier 1 permit without hunting moose in unit 13, I would have done that. Doing so would have saved me money on my draw hunt application and would have increased my household's hunting opportunity as either my wife or myself could have harvested a caribou in unit 13 instead of being limited to a single, non-transferrable caribou tag.

Proposal 39: Remove the requirement that Unit 13 Tier 1 caribou hunters shall hunt moose in unit 13.

I conditionally support this proposal, as long as it is adopted after the 2017/2018 hunting season. I believe doing so would reduce pressure on moose in unit 13. I believe that this would allow equal opportunity for all Alaskans to access the Nelchina herd. I believe that changing the hunt conditions now would be an unfair advantage to hunters who chose the Tier 1 caribou tag for the 2017/2018 season. I applied for a drawing caribou permit because I was cognizant of the amount of time I would have available to hunt moose in unit 13 during the 2017/2018 hunting season, and felt that my best opportunity to harvest a moose was to have hunting opportunities outside the unit. If the regulations would have allowed me to choose a Tier 1 permit without hunting moose in unit 13, I would have done that. Doing so would have saved me money on my draw hunt application and would have increased my household's hunting opportunity as either my wife or myself could have harvested a caribou in unit 13 instead of being limited to a single, non-transferrable caribou tag.

Proposal 40: Remove the requirement that unit 13 Tier 1 caribou hunters shall hunt moose in Unit 13.

This proposal has three components.

Component 1: Remove the requirement that Unit 13 Tier 1 caribou hunters shall hunt moose in Unit 13. I conditionally support this proposal, as long as it is adopted after the 2017/2018 hunting season. I believe doing so would reduce pressure on moose in unit 13. I believe that this would allow equal opportunity for all Alaskans to access the Nelchina herd. I believe that changing the hunt conditions now would be



an unfair advantage to hunters who chose the Tier 1 caribou tag for the 2017/2018 season. I applied for a drawing caribou permit because I was cognizant of the amount of time I would have available to hunt moose in unit 13 during the 2017/2018 hunting season, and felt that my best opportunity to harvest a moose was to have hunting opportunities outside the unit. If the regulations would have allowed me to choose a Tier 1 permit without hunting moose in unit 13, I would have done that. Doing so would have saved me money on my draw hunt application and would have increased my household's hunting opportunity as either my wife or myself could have harvested a caribou in unit 13 instead of being limited to a single, non-transferrable caribou tag.

Component 2: Increase the bag limit to two caribou per household. I conditionally support this proposal. I support that two caribou per household is a more reasonable number of caribou for subsistence use than one. I believe that this change should take effect after the 2017/2018 hunting season. People have already chosen which hunt best suits their needs for 2017/2018 under existing rules. Changing permit conditions and bag limits to result in increased opportunity for some user groups, not all is unfair.

Component 3: Add a youth hunt the first 10 days of August. I conditionally support this component provided that it takes effect after the fall 2017/2018 hunting season. Additional opportunity for youth hunters is a positive offering to get the next generation of hunters involved in hunting in Alaska.

Proposal 41: Shorten the season dates for the unit 13 draw hunt and remove the requirement that Tier 1 hunters hunt moose in unit 13.

This proposal contains two components:

Component 1: Shorten the season dates for the unit 13 caribou draw hunt to two week periods. I oppose this proposal. In the two most recent years only 35% of the permits issued for unit 13 caribou were draw permits. Limiting participation in the hunt to shorter hunt windows for the draw permit will not result in significant reduction in crowding in the unit. Furthermore, in my experience, the majority of the crowding occurs within ¼ mile of roads and motorized trails. When I travelled by foot or bicycle into non-motorized areas, I rarely saw other hunters.

Component 2: Remove the requirement that Tier 1 hunters only hunt moose in Unit 13. I conditionally support this proposal, as long it is adopted after the 2017/2018 hunting season. I believe doing so would reduce pressure on moose in unit 13. I believe that this would allow equal opportunity for all Alaskans to access the Nelchina herd. I believe that changing the hunt conditions now would be an unfair advantage to hunters who chose the Tier 1 caribou tag for the 2017/2018 season. I applied for a drawing caribou permit because I was cognizant of the amount of time I would have available to hunt moose in unit 13 during the 2017/2018 hunting season, and felt that my best opportunity to harvest a moose was to have hunting opportunities outside the unit. If the regulations would have allowed me to choose a Tier 1 permit without hunting moose in unit 13, I would have done that. Doing so would have saved me money on my draw hunt application and would have increased my household's hunting opportunity as either my wife or myself could have harvested a caribou in unit 13 instead of being limited to a single, non-transferrable caribou tag.

Proposal 42: Close the DC485 permit after September 20.



I oppose this proposal. Unit 13 is huge and there is ample room for hunters to spread out, provided they are willing to walk a reasonable distance from their motorized vehicle.

Proposal 44: Modify the permit conditions for the community subsistence harvest hunt permit conditions for the Copper Basin Community Subsistence Hunt.

I believe that Karen Linnell should recuse herself from voting on this proposal as it was submitted by Ahtna Tene Nene' and represents a conflict of interest due to her position on the Ahtna, Incorporated board.

I oppose this proposal. Ahtna Tene Nene' states that their intention with this proposal is to amend the rules to follow the "board's intent when originally establishing the CSH for the eight communities listed in 5 AAC 92.074(d)." The intention of the community subsistence harvest hunt may have to provide the eight communities additional harvest opportunity, but it was not to provide them with exclusive additional harvest opportunity. The current community harvest and Tier 1 hunt structure recognizes that the pattern for community harvest is not limited to the geographic community concept supported by Ahtna. The board of game recognizes there are two basic patterns of subsistence use of game in unit 13: *1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2.) "the community-based pattern established by the Ahtna" (2006-170-BOG). The board recognized that the community-based pattern has been "adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents."*

If the board were to adopt this proposal it would be choosing to only recognize the geographic definition of community supported by Ahtna. Other Alaskan residents should have the opportunity to access the animals in Unit 13 for the purpose of subsistence activities so that they may also adopt the community-based subsistence pattern.



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3/1/2017 7:41:47 PM
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Proposal 21-5AAC-85.045 Need to eliminate the community subsistence harvest moose hunts. They get to start twenty days before the regular season.If you keep the community hunts then they should start same day a regular hunts.I've seen to many abuses of the community hunts and there is not enough enforcement in Units 11,12 and 13.



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Proposal34-5AAC 85.025 I agree with James Holmes on this proposal. Need to eliminate the community subsistence harvest hunt for caribou. Ever since Tier I caribou permits , community hunts and draw permits started, theres way to much hunting presure at the same. I've hunted Unit 13 since 1955 with my dad and its no longer fun hunting caribou in Unit 13. Way to many hunters at one time. Thers not enough enforcement of the hunting laws.



Submitted By
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1/20/2017 6:37:34 PM
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Proposal #1 - oppose. The Ahtna community has ample opportunity to harvest moose with the regular hunting season, the federal subsistence hunts and the vast private lands to which they have access. The community moose harvest should be discontinued.

Proposal #2 - support. The community harvest hunts for moose and caribou should be eliminated. I believe the bull moose population is being decreased by too many "any bull" harvests.

Proposal #3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18 - support eliminating the community harvest hunts

Proposal #19 - oppose. the community moose hunt should be discontinued

Proposal #20 - oppose - Tier II would not be an acceptable alternative. Many people stretch the truth when applying for Tier II.

Proposal #21 oppose. Tier II would not be an acceptable alternative. A registration moose hunt would not be an acceptable alternative.

Proposal #22 oppose. A registration hunt would not be an acceptable alternative. It would result in mass crowding of the hunting area on the opening day.

Proposal #23 support - eliminate the community harvest hunts and use the usual hunting seasons and antler restrictions. This provides ample opportunity for all hunters to harvest an animal.\

Proposal #24 -oppose, The community moose harvest should be eliminated,

Proposal #25 - oppose - the community moose harvest should be eliminated. Changing the the size restrictions in the community moose harvest is not a viable alternative. The subsistence hunt is not about being "more sporting" it is about putting meat on the table

Proposal #26 - oppose. It puts more restrictions on the size of a legal moose. Many moose are over 50 inches wide but do not have 4 brow tines. If anything make it a certain number of points on one antler to be a legal bull instead of the width in inches.

Proposal #27 - support - I support decreasing the number of brow tines from 4 to 3. This would increase the number of bull moose available for harvest.

Proposal #28 - oppose. It is hard to estimate a 36 inch moose. I believe that many illegal bulls would be shot with 36 inch restriction.

Proposal #29 - support. The nonresident hunts should be eliminated. If there is not enough moose available to meet the needs of Alaskans, then the nonresidents should be eliminated to help meet those needs.

Proposal #30 support - the Community caribou hunt should be eliminated. There is ample opportunity under the Federal subsistence hunts to harvest caribou for residents of that area.

Proposal #31 - support. The Community caribou hunt should be eliminated.

Proposal #32 - oppose. The paperwork would become extremely burdensome and I believe that trying to place the area restrictions on the hunters would violate the state constitution.

Proposal #33 - oppose. just eliminate the community harvest hunt and continue with the Tier I

Proposal #34 - support - eliminate the the community harvest hunt and continue with the Tier I - when the population is high - give two permits per household. This should help decrease the over population,

Proposal #35 - support - eliminate the community harvest hunt and eliminate the requirement for Tier I caribou hunters to also hunt moose in unit 13. Many of these hunters would go elsewhere to hunt moose which decrease the pressure on the moose population.

Proposal #36 - oppose - the community harvest hunt should be eliminated. There is ample opportunity under the Federal subsistence hunts to harvest caribou

Proposal #37 - oppose - we do not need to create another special hunt There is ample opportunity for parents to take their children



hunting under the current hunting seasons.

Proposal #38 - oppose there are other proposals that offer better solutions than this one.

Proposal #39 and 40 - support - eliminate the requirement to hunt moose in unit 13 if you have a Tier I permit - this would shift some hunting pressure for moose away from unit 13

Proposal 41 and 42 - oppose and replace with more no off road vehicle areas. This would eliminate a lot of the over crowding of hunters. It would allow hunters who don't mind walking to have a more enjoyable hunt. I am 64 years old and still hike off the road to hunt.

Proposal #43 - oppose - we do not need to create more special hunts. There is ample opportunity to hunt moose in these areas under the current general season.

Thank you for this opportunity to comment on these proposals.



ADF&G
Attn: Boards Support Section
P.O. Box 115526

RECEIVED

FEB 14 2017

BOARDS
ANCHORAGE

From: Brian West
1000 Oceanview Drive
Anchorage, Alaska 99515

Subject: Special Meeting on Copper Basin Area Moose and Caribou Hunting in Units 11,12 and 13.

Comments:

Proposal 1. Oppose. Ahtna wants several things in this proposal; first they want CSH entities to be placed in regulation, then they want only 8 towns of their choosing to be the designated CSH communities and they want only members of the CSH communities to be able to hunt in the CSH area. There are many reasons to oppose this proposal. First they assume that the human populations in these areas will remain constant over time, and to put the CSH communities in regulation ignores this. Second it assumes that only a few communities, all of which are on the road system, are eligible for subsistence. This infringes on the rights of all Alaskans to pursue a subsistence tradition. Third, Ahtna would have only their 8 towns enshrined in regulation. This would be unconstitutional and is why we now have 25 person communities. The proposal also states that only members of the CSH communities proposed by Ahtna would be allowed to hunt in the CSH area. This too is unconstitutional. As a state resident I am eligible to hunt on state land.

The Board need to remember that the mess which is moose and caribou hunting in these units was caused by the greed of the Ahtna tribe. Since inception of the permit system for hunting caribou in these units Ahtna has pressured the Board, successfully, to change the hunt type and the various scoring systems to put permits in the hands of their members. Now they are trying the same approach with moose hunting. Ahtna has no more right to hunting in these areas than any other resident. It should also be remembered that Unit 13 has traditionally been used to meet the subsistence needs of Anchorage residents.

Proposals 2 through 13. Support. These proposals are all practically the same. I did not support the original CSH designation. Many of the problems with this were predicted and have come to pass. The CSH concept is inappropriate and will decimate the moose herd. As predicted, it did not take people long to figure out the advantage of forming a CSH community. The department of Fish and Game will not always be able to close the season for "any bull" quickly enough to prevent the eventual over harvest. The CSH designation was just one in a long string of attempts by Ahtna to give their members an advantage over all others.

I have contended for years that the most effect way to manage this hunt for caribou and even moose is to eliminate the use of off road motorized vehicles. Do this for the fall hunt, if quotas are not reached then open the winter season by registration permit and allow the use of off road vehicles. The registration hunt should be open to all hunters even those that were successful in the fall hunt. Make the permits available in person in Glennallen and Anchorage. This would put more caribou into the hands of rural residents, but most importantly, no one would be discriminated against. I have always hunted Unit 13 caribou and moose on foot and have always been successful. People truly dependent on the game will find a way to be successful. Those who can't manage the hunt on foot can wait for the winter hunt. It is highly likely that mostly rural residents would participate in the winter hunt.



The same approach could work for moose. The fall hunt could be any moose and the winter hunt could have antler restrictions. Few moose would be taken in the fall. The winter hunt would mostly consist of rural participants.

Proposal 14. Support. However, I believe that proposal 43 with amendments would be better. My comments on Proposal 43 are listed later.

Proposal 15. Support as amended. Deleted the following part of the first sentence "... or change season dates and eliminate any bull tags as follows:"

Proposal 16. Support. Eliminate the CSH hunt.

Proposal 17. Oppose. Eliminate the CSH hunt

Proposal 18. Support. I support the elimination of this ill conceived hunt.

Proposal 19. Oppose. Eliminate the hunt do not try and amend it. It is not fixable.

Proposals 20 & 21. Oppose. Any Tier II type hunt would need to be open to all residents, not just local community residents. This area is on the road system and all residents on that system should be eligible. Any Tier II question/scoring system should have only two questions; how long have you hunted and what is your income? The Alaska court said that eligibility could not be denied because of income but said income could be part of a scoring system.

Proposal 22. Oppose. Opening day would be a nightmare with everyone wanting to get their "any bull" before the season is closed by emergency order. This would lead to over harvest which would be good for no one.

Proposal 23. Support. I support the elimination of the CSH whether it be for caribou or moose.

Proposal 24. Oppose. Once again Ahtna is trying to guarantee their members get permits. They care not for their fellow Alaskans who also rely on this resource. It was Ahtna who pushed for the CSH designation in the first place and now it is not working as THEY intended. The Court was right in saying that all must be treated equally.

Proposal 25. Oppose. Eliminate the hunt. What is magic about 50 miles other than the proposer probably lives within this. This ignores that there are subsistence users in Anchorage and that their best opportunity for big game is in Unit 13.

Proposal 26. Oppose. Current regulation includes 50 inches or 4 brow tines, this proposal does nothing except eliminate what otherwise would be a legal bull (those 50 inches or greater). A moose could be 50 inches but not have four brow tines.

Proposal 27. Support.

Proposal 28 Oppose. No matter what antler size is selected people will have difficulty determining size. The 50 inch antler restriction seems to have been an effective management tool over the years.

Proposals 30 & 31 Support.



Proposal 32. Oppose. This would be nothing more than a writing exercise. Who would review the letters and what would be the appeal process? I am sure Ahtna would have a form letter for use by their members, would such a thing be allowed? It must be remembered that the Tier I system was instituted by pressure from Ahtna. Now it is not working as they intended. It was predicted that the number of people applying for the Tier I permits would increase. The best way to manage this hunt is to eliminate the use of off road motorized vehicles. Lots of permits, probably double the amount currently provided, could be given out.

Proposal 33. Oppose. The one week periods and on line requirements do not allow reasonable opportunities for subsistence users. Not all have computers or can afford them. Also, deciding when to hunt is more a matter of weather and temperature than a day on a calendar.

Proposal 34. Support.

Proposal 35. Support. The caribou-moose link was intended to limit the number of people applying for caribou permits it did not work. It has also increased the pressure on moose in the Unit. The only effective way to limit the number of people applying for permits is to restrict the use of off road motorized vehicles.

Proposal 36. Oppose. There can be no native preference. The CSH system is open to all as determined by the court. This proposal states that only specific towns qualify for a CSH community designation. This is contrary to the Courts decision. Furthermore, 2 caribou per household would lead to over harvest by the CSH communities as the number of households exceeds 150.

Proposal 37. Oppose. There is no need for a special youth hunt. The season opens August 10 several weeks before school opens. There is also too much demand from other groups especially subsistence users to create another special user group. This will also do nothing to alleviate the overcrowding she believes is occurring.

Proposal 38 &39. Support.

Proposal 43. Support with amendments. Eliminate requirement to apply on-line and replace with in person registration at Fish and Game offices.

A handwritten signature in cursive script, which appears to read "Brian J. White", is located at the bottom center of the page.



This proposal supplement was issued late by the Fish & Game, not being received until Feb 25th. I am sending the only route available, U.S. mail. I would have brought them to the local board support individual in Anchorage but she is out at a board of fish meeting. Other staff did not want to handle it.

I expect my comments to be included.

Sincerely
Brian West





To: ADF & G

Page 1 of 3

Attn: Boards Support Section
P.O. Box 115526

From: Brian West

1000 Oceanview Dr.
Anchorage, Alaska 99515

Subject: Special Meeting on Copper Basin Moose and
Caribou Hunting in Units 11, 12, and 13.

Comments:

Proposal 44. **OPPOSE**. The proposers issue statement shows that the purpose of this proposal is to limit the number of communities participating in the CSH program and establish a Native preference in conflict with state law.

This proposal has many problems, in the end its adoption will increase the number of CSH communities, not decrease them. It will also increase the pressure on the moose population by increasing the bag limit from one moose per three families to one moose per family.

The proposer would establish a rigorous process of approval for all who would want a CSH community designation, except for themselves.



Page 2 of 3

After going through the process a community would receive their designation. As part of their submittal each community must provide information as to the seasons and bag limits they require for subsistence. This will lead to quotas for each CSH community. Because of the large number of people hunting in Units 11, 12, and 13, and human population growth, there will be distinct advantages to being in a designated CSH community. The number of CSH communities will increase substantially. Hunters not in a CSH community will eventually be eliminated from hunting in these Units. This realization will lead to the formation of even more CSH communities.

The CSH designation should have never been authorized in hunt management Units accessed by the Alaska highway system. It should be abolished. Current hunting regulations through Tier I or general seasons are supportive of subsistence needs. No individual needs to be part of a CSH community to meet their subsistence needs. The formation of the CSH program attempted to give one group of people an advantage over all others.

This proposal provides special advantage to existing CSH designated entities. As new communities may only be formed or approved



Page 3 of 3

during regularly scheduled board meetings. Effectively, there would be no new communities for the 2017 season. What guarantee is there that the board will even take up the approvals during their meetings? Will the approvals then be subject to public comment? These approvals could easily be put off. Is that what the proposer is counting on?

This proposal provides conflicting regulations for communities, confusing 25 member communities with communities that would actually be considered towns.

Paragraph 52B of the proposal is confusing, it can be interpreted to mean that a person is limited to participating as a member of a CSH community once every three years.

The entire regulation becomes confusing with the establishment of 25 member communities. Part of the proposal states that non subscribing members are not limited to participating in the CSH. However, the individuals must sign up to form the community. Distinction needs to be provided for communities which are in fact towns, and communities which are groups of people formed to establish a CSH community of 25 members.

What does the proposer mean by a "wide diversity of subsistence ~~resources~~ resources."?

The most reasonable action for the board to take is to eliminate the CSH designation for anyplace accessible by the Alaska highway system.



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

March 3, 2017

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

Subject: March 2017 Special Meeting on Copper Basin Area Hunting and Subsistence

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Mentasta Lake, Alaska, on March 1 and 2, 2017. At this meeting, the SRC reviewed the proposals that will be considered at the Special Meeting on Copper Basin Area Hunting and Subsistence in March 2017 and would like to provide the following comments:

The Commission's first recommendation is to support a modified version of Proposal 20. Specifically, the modification would retain the community subsistence hunt for moose in combination with the proposed establishment of a Tier II moose season in GMU 13. The community hunt would be retained with enforcement of existing hunt conditions, except that the voluntary individual reporting would be eliminated. Those community hunt participants who receive Tier II moose permits would be eligible for an "any bull" quota of 150 moose in GMU 13 with a season of August 20 to September 20. Community hunt group members who don't qualify for Tier II permits would hunt under general seasons hunt dates and harvest limits in Unit 13. Both Tier II and the community hunt are subsistence hunts. The Commission believes that blending Tier II permits with the community hunt will result in a more workable program for local people to harvest a moose.

The Commission's second recommendation is to eliminate the requirement that people who participate in the community hunt for caribou must also hunt moose only in the community hunt area. And vice versus, people who participate in the community hunt for moose should not be required to hunt caribou only in the community hunt area. This requirement did not work as anticipated and should be eliminated.

Thank you for the opportunity to comment.

Sincerely,

Daniel E. Stevens
Chair



Interior/Northeast Arctic Region Meeting

1 Feb. 2017

Al Barrette

380 Peger Rd.

Fairbanks, AK. 99709

907-452-6047

Personal Comments

Mr. Chairman and members of the BOG.

I respectfully submit my personal comments for your review.

Proposal 47 DNS. This proposal asks to change the definition of what is to edible meat from game birds. It would seem to me, if this was to be changed. Persons would not be able to use those parts that some don not like to use for human consumption, but do like to use for bait. I do not believe there is a wanton waste of game birds currently. I think current salvage requirements are acceptable with current consumptive wildlife users.

Proposal 48 DNS. I would not support, because adding another weapon would add more hunters. If we keep adding weapons that can be use in restricted weapons areas, I think it would be easy to rewrite the regulations to weapons not allowed. As the author also used a point of merit, that younger or older hunter would or could benefit, but it is not exclusive to those groups. Restricted weapon hunts are just as it is indicated "restricted". Restricted in the literal sense does not allow for everyone or weapon. But the board is getting closer each cycle, adding weapons to be allowed in restricted weapons hunts. It may be time to make the regulation to cite which weapons are not allowed, this would be a shorter regulation.

Proposal 49, 50 Support. I believe this was not the intent of the statue nor should it be. I also the think the legislature discuss this while the bill was going though hearings. To give those residents who would like to share and be with family members who are not residents and opportunity to hunt together for a species of big game in this state which is only affordable in most cases to the upper middle class and wealthy. I would hope it is not the intent of the BOG to penalize Alaskan residents for partaking in this exemption in statue, when there is not a stock of concern for that species in that area or region.

Proposal 64 DNS. The issue with this proposal is "sub legal ram". If it is not allowed to be harvested, it cannot be taken. Nannies are legal to take.

Proposal 66, DNS. I do recognize that a special archery season would have a low impact on the harvest, and would provide more opertunity. But what do we do when the muzzle loader users want the same exceptions, what about those who use pistols, what about those over the age of 62? You the BOG have a youth hunt season that starts before the "no use of aircraft" regulation, if this passed it would also be outside the use of no aircraft regulation. It also raises the question why do have a regulation restricting some with uses of aircraft and not others? Lastly, the Haul Road provides and archery only area in the



interior. The last two times the legislature tried to amend the Haul Road corridor statute, the archery community tenaciously at such amendments.

Proposal 69, 70, 71 DNS. Every special group by age, method, domicile or disability wants a special season, longer season, or less limits.

Proposal 73 Support as amended. I don't want the use of dogs to hunt coyotes when there is a trapping season. For all the obvious reason. But this proposal has merit outside the trapping season.

Proposal 77 support raising the brown bear bag limit to two. I do not notice a proposal to sell brown bear hides or skull. But is only mention in the issue section of the proposal. But it is interesting that Brown Bear in unit 21 E have a positive finding of C&T, yet the regulation on bartering big game with a positive C&T only applies to the meat of big game. This would be a good to address. Why only the meat of big game, and the horns/antlers, (if separated from skull) and not the hide/skull of a subsistence taken Brown Bear? 5 AAC 92.200 (b)(1)

Proposal 82 DNS. It would seem from my research resident just choose not to hunt in this area for several reasons. Mostly issues around access/logistics. I do not believe more residents will choose to participate, because there is fewer nonresidents having an opportunity.

Proposal 84 support. But it is noteworthy to point out, that recent federal action on taking of bears, wolves and caribou, that the federal wolf season starts early than the State's.

Proposal 86 DNS. Moving the boundary only moves the issue. You are currently not allowed to shoot on, over, or across a highway or road. Making a corridor, essentially just makes a wider highway or road. The issue will still remain. Some will still shoot on, into, or across the corridor if enacted. Also enforcement issues will remain the same.

Proposal 90 DNS. Consumptive users are still allowed to hunt this area. Regulations do not restrict an opportunity if you are not part of a CSH. Why make an area that is less crowded, into a crowded area? One of the main principles of the CSH is to share. I remember hearing and learning a lot about sharing harvested moose and caribou. How it helped the elders and those with disabilities, and those that could not participate. Instead of making a larger area. Why not educate users about the "proxy hunting". The legislature recognize that not everyone can participate in the subsistence or general hunting opportunities afforded to them, so they enacted AS 16.05.405. This law fits well with the intent of the proposer and a main criteria of community hunting. (Harvest for elders, persons with disabilities, and sharing) Everyone should respectfully share their successful harvest. It does not take CSH or area to teach or practice this. As the proposer suggests it is less crowded and will be adventurous to keep it this way and you can still practice traditional subsistence.

Proposal 100 DNS. This proposal really has nothing to do about WACH decline, or any other caribou herd in decline. I know of no research that attributes aircraft sounds to declining caribou population.

Proposal 101 DNS. Unit 25D has the vast majority of all rural communities with in unit 25. 25D could also be the largest subunit of unit 25. Unit 25D also has been in a Tier II status for decades for moose. Biologically it would be ill advised to take cow moose. I would still advise, not even taking bull moose for any of the community events listed but are not limit to as stated by the proposers. Because there is no harvestable surplus for anything but the most qualified subsistence user, TIER II. Furthermore I think this



would be a great time to review some of the 8 criteria for subsistence uses found in: 5 AAC 99.010(5) “persevering, and storing” so wild resources can be use in for future uses. (6) “values” which includes the value of sharing of a successful harvest and preparing for future uses, gatherings and unforeseen events. (7) “distributed, or shared, and gift giving” all are good criteria of subsistence and should be practiced at locally gatherings or whenever possible. (8) “wide diversity of fish and game resources” Moose may be preferred, but subsistence people need to use all sources of subsistence foods for (8) “cultural, and social” gathering or events. Most game in unit 25 have positive findings of C&T.(except for two areas for sheep and brown bear) I believe if you review why there is a positive C&T on game in unit 25 via 5 AAC 99.010 (1-8) the eight criteria, you may understand why it is not necessary to have a special permit for taking moose out of season, when subsistence patterns and uses already exists. The same proposers are asking for a different finding of C&T for brown bear in 25D. (Proposal 108) I would great if they can show they have used some of this brown bear meat harvest at such events listed in the proposal.

Proposal 103 support. This is not a new proposal. When members of the public, or AC’s have summited the same concept, past Boards voted them all down. The Department believes this would be a good tool. So why haven’t they been using it? They already have the authority per AS 16.05.370 Reports by licensees. (a) The commissioner may require a report to be made by each licensee concerning the time, manner, and place of taking fish and game, the kinds and quantity taken, and other information helpful in administering the fish and game resources of the state.

I would also review AS 16.05.330 Licenses, tags, and subsistence permits.

- (a) Except as otherwise permitted in this chapter, without having the appropriate license or tag in actual possession, a person may not engage in (1) sport fishing, including the taking of razor clams;
- (2) hunting, trapping, or fur dealing;
- (3) the farming of fish, fur, or game;
- (4) taxidermy; or
- (5) control of nuisance wild birds and nuisance wild small mammals for compensation.

I do not see anywhere in the statue chapter “except as otherwise permitted” that the BOG could exempt persons residing north of the Yukon River not to have been require to have harvest tickets/reports.

Proposal 108 Support. It always good to review. But not because a game population has increased, or a bag limit may or has changed. But to check 5AAC 99.010 (b) Each board will identify fish stocks or game populations, or portions of stocks or populations, that are customarily and traditionally taken or used by Alaska residents for subsistence uses by considering the following criteria: So has something changed since the last finding of negative C&T? Bag limits are not part of the 8 criteria.

Proposal 114 Support as amended. I would ask the closing date [MARCH 31], for hunting to be amended to **Last day of February**. I do not support starting the season early. As stated in the board meeting in Bethel last month by board members, that an earlier season for the take of wolverine could impact females that are whining their kits into July. This justified not passing the proposal. Why I would want the season to close earlier (**Last day of February**) is because this is the time pregnant females are going into denning or are already have kits in dens. If you kill one of these females it is 100% mortality on the



whole family after February. I would gather the conservation of the resource is just as important at the start of the season, as should it be at the end of the season.

Proposal 124. This should have already be accomplished per Statues AS 16.05. 370 Reports by licensees. (a) The commissioner may require a report to be made by each licensee concerning the time, manner, and place of taking fish and game, the kinds and quantity taken, and other information helpful in administering the fish and game resources of the state. Also As 16.05.420 License, tag, permit, and registration violations. The department has been reluctant to use their authority that has existed. What is going to change?

Proposal 134 DNS. Creating a new management area dose not solve this issue of trespass. In fact changes nothing. Privet property is that. Trespassing laws already exist. Non owners have to get permission to trespass on privet lands already. New amendments to trespassing statue void even having the land owner to even post privet lands. It is up to the non- land owner to get permission before enter privet lands. This not what a management area are intended for.

Proposal 135 DNS. Pregnant females are at least going into den sites in February and some may have already had kits. From a conservation of the resource I would not support lengthening the season any further than it already is. If you could I would support shorting the season to the **Last day of February**. At the Bethel meeting last month a couple of board members state that taking wolverine in July when females are whining pups could result in a mortally of some of those kits. Female wolverine that have kits in the den, February through March and are trapped or hunted will result in 100% mortally of those kits in the den. Incidental take is not an issue. But allowing a season for wolverine past February is.

Proposals 141 and 142 DNS. This request to close an area of 20C to no opportunity does not comply with Alaska subsistence law, AS 16.05.258. 20C has a healthy wolf population therefore subsistence users should not be restricted to no opportunity on their traditional trap lines on state lands, when there is no conservation concern. I believe this is pretty clear in the law. Also I believe that stating a subsistence trapper in this proposed closed area could go or move to a different part of 20C to provide opportunity. Would not be consistence with economy effort, a pattern of long use of the resource harvested in the area, and so on. It could be argued that the subsistence trappers in this area meet all of the 8 criteria found in 5 AAC 99.010. Also if the subsistence trapper had to move to a different area to be provided his opportunity, he would be competing and conflicting with subsistence users. The very first trapper's responsibility in the "code of ethics" for trappers is 1. "Respect the other trapper's "grounds".- particularly brushed, maintained, traplines with a history of use.

Viewing opportunity and economical befits to the State and Denali area. If you visit the Denali National Park web site. <https://www.nps.gov/dena/learn/management/statistics.htm> Park statistics. you will see a chart with numbers of people that visited the park from 2000 to 2016. from that chart you can see park visitations has only grown. Couple things to look at on the chart. 1. When the buffer zone was closed to the take of wolves. Park visitation only grew by about 100,000 visitors. Yet in the spring of 2010 the BOG rescinded the buffer zone and visitation grew by about 200,000 more visitors to date, or just under twice as many more visitors. Glitter Gulch the retail/hotel community just outside the park has also grown profoundly. The retail community has not been even remotely effect by the buffer area being opened. There are now stop and go lights, new foot bridges, and bike and foot paths. Capitalists have invested there money and efforts to Denali because it is profitable. If DNP supervisors and leadership had any concern of viewing opportunity for wolves. They have 6,075,030 acres (9,492 square miles) to



find an opportunity for their visitors. Thus would not have to spend time at the BOG meeting every three years trying to convince that current board why there should be a closed area on State land to subsistence users.

Lastly like a couple of other proposals I have commented on. Making a closed area just shifts the issue. Wolves (Denali wolves?) will still get harvested outside the proposed closed area. Case in point. Last spring a male wolf was freshly collared in Denali and was caught shortly after that by a subsistence trapper in the heart of Minto Flats. Wolves have territories and those territories are defined by amount of food resources they access to and size of pack to defend those territories. Not man made areas or boundaries.

Proposal 159 DNS. A better proposal or amendment should be considered. "If a hunter who is found guilty of harvesting an illegal moose, the offender shall attend a moose identification class by the department or an approved organization".

When the BOG changed the bag limit on the bull opportunity in 2012 and 2014. Which resulted in a higher illegal take. Did this happen in other areas of the state where the BOG enacted similar restrictions? How many of the illegal taken moose was from nonresidents? Does data show that this is something that could happen as a result of a new change in the regulation in the first few years but over time hunter educate themselves to what is legal, and thus the illegal take starts to drop? The authors suggest; "are being mistaken for 50 inch bulls by inexperienced hunters". Is this true, and what is an inexperienced hunter? If this is happening because of inexperienced hunters why should experience hunter have to take a class? I would encourage the board not to adopt this as written. The information is already available in the "handy dandy" and the department. The spike/fork, 50" 4 brow tine regulation is not new to Alaskan game regulations.



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
10.D. (AKRO-NR)



DEC 21 2016

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

Dear Chairman Spraker:

Thank you for the opportunity to participate in the Board of Game process. As has been mentioned in both written and in-person testimony, the vast majority of Board decisions are in alignment with National Park Service (NPS) management objectives. We appreciate your consideration on the handful of proposals that may not be consistent with NPS-related statute, regulation or policy. Following are NPS comments on proposals before the Board of Game during the February 17-25, 2017 meeting in Fairbanks that have the potential to affect National Park Service (NPS) areas in the state.

Proposal 66: NPS Recommendation: Oppose.

This proposal would open an archery-only hunting season for Dall sheep in the Interior/Northeast Arctic Region including GMUs 12, 19, 20, 21, 24, 25, 26 which includes areas of Gates of the Arctic National Park and Preserve, Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. The NPS does not support extending the season in areas where harvest is not limited by quotas and sheep populations are in decline. For example, Gates of the Arctic National Preserve (GMU 26A) has a popular general hunt and extending the sheep hunting season has the potential of increasing harvest following a large decline in 2013. These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied state-wide. Because these proposals create a potential for increased sheep harvest in a time of declining sheep populations, we ask that NPS lands be excluded if this proposal is adopted.

Proposal 67: NPS Recommendation: Oppose.

This proposal would lengthen the season for bear baiting in the Interior/Northeast Arctic Region, which includes NPS Preserve lands. NPS regulations prohibit the harvest of black and brown bears over bait.



If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 72: NPS Recommendation: Oppose.

This proposal would allow the harvest of wolf and coyote by land and shoot with a trapping license in the Interior/Northeast Arctic Region (GMUs 12, 19, 20, 21, 24, 25, 26B & C), which includes areas within Gates of the Arctic National Park and Preserve, Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. Same-day airborne taking of wildlife including coyote is prohibited by NPS regulations.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 73: NPS Recommendation: Oppose.

This proposal would allow the use of dogs to hunt coyote in Unit 20 including portions of Denali National Preserve and Yukon-Charley Rivers National Preserve. Excepting black bears, the use of dogs to hunt big game or fur animals is currently illegal under State regulations and the NPS supports this restriction to protect wildlife populations from disease, injury, and harassment. The proposal also references the action as a means to increase small game populations for hunters and, therefore, would conflict with NPS regulations that prohibit predator reduction efforts with the intent to manipulate predator/prey dynamics.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 90: NPS Recommendation: Oppose.

This proposal would expand the Copper Basin community harvest hunt area by adding a part of Unit 12 including that portion within the Nabesna River drainage west of the east bank of the Nabesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge. The proposed expansion area is entirely within the boundaries of Wrangell-St. Elias National Park and Preserve. The Wrangell-St. Elias National Park Subsistence Resource Commission has expressed concerns about the potential for increased hunting pressure in Wrangell-St. Elias National Preserve that could result from this expansion in an already sees high numbers of hunters and significant hunting pressure. Additionally, they feel that the community hunt is not working and have recommended discontinuing the community hunt and starting discussions with stakeholders in the Copper Basin about alternatives. We support the Commission's recommendations to oppose expansion of the hunt area until stakeholders are engaged to discuss options.



Proposal 91: NPS Recommendation: Support with modifications.

This proposal would modify the hunting season and bag limits for grouse in Unit 12, including areas within Wrangell-St. Elias National Preserve, to reduce take from fifteen per day, thirty in possession Aug 10 - Mar 31 to a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20—November 10. The NPS agrees with the proponent of this proposal that the existing the bag and possession limits are likely too high given the current hunting pressures, especially in road accessible areas. Large groups of hunters are often observed along the Nabesna Road (GMU 11 & 12) and McCarthy Road (GMU 11) who harvest their limits, resulting in significant take of grouse. The NPS supports the proposed change in harvest and possession limits for grouse; however, we recommend modifying the proposal to retain the existing season dates to maintain the opportunity to harvest grouse in the winter.

Proposal 99: NPS Recommendation: Oppose.

This proposal would shift the hunting season for wolf in Units 24 including portions of Yukon-Charley Rivers National Preserve forward by 11 days. The NPS does not support the taking of wolves during the denning season when their pelts have little trophy, economic, or subsistence value; or when harvest appears to be wanton waste. NPS regulations prohibit the taking of wolves between May 1 and August 9.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 109: NPS Recommendations: Oppose.

This proposal would lengthen the brown bear hunting seasons in Units 25A, 25B, 25D, 26B and 26D including areas within Gates of the Arctic National Park and Preserve and Yukon-Charley Rivers National Preserve. This proposal would open the State season 8 days prior to the Federal season, which may negatively impact federally-qualified subsistence users. This proposal is not consistent with efforts to align State and federal seasons. It would increase the complexity for Alaskans trying to abide by all applicable State and federal harvest regulations.

Proposal 114: NPS Recommendation: Oppose.

This proposal would lengthen the hunting season for wolverine in Unit 26 including portions of Gates of the Arctic National Park and Preserve. The NPS does not support the taking of furbearers when their pelts have little trophy, economic, or subsistence value; or when harvest appears to be wanton waste. Wolverine taken by sport hunters in the summer also reduces opportunity and potential economic gain by local subsistence trappers. For these reasons, we ask that the Board exclude NPS lands if this proposal is adopted.



Proposals 141 & 142: NPS Recommendation: Support.

Proposal 141 would close small portions of Unit 20 adjacent to Denali National Park and Preserve to the taking of wolves. Based on scientific research, we found that limiting harvest of wolves along the boundaries of protected areas was associated with increased wolf-sighting opportunities for visitors to these areas. This in turn could increase associated economic benefits to adjacent communities. We continue to support the protection of wolf-viewing opportunities in Denali National Park and Preserve and will attend the February meeting to testify and answer any questions.

Proposal 142 would close more of Unit 20 to the taking of wolves than would proposal 141. While the NPS proposes something more modest, the Park Service also supports proposal 142 as a strategy to increase wolf-sighting opportunities and associated economic benefits to adjacent communities.

We appreciate the Board's recognition that laws, regulation and/or policies affecting the NPS may differ from the State, and may even require different management approaches. Where that is the case, we ask that NPS areas be excluded from regulations implementing intensive management objectives in Alaska's hunting regulations. We recognize and appreciate previous Board actions where consideration has been given to exclude intensive management measures on NPS-managed lands.

Again, we appreciate the opportunity to provide you with comments on these important regulatory matters and look forward to working with you on these issues. Should you or your staff have questions or comments, please feel free to contact me at (907) 644-3505.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debora Cooper".

Debora Cooper
Associate Regional Director



To: Alaska Board of Game
From: Brian West
1000 Oceanview Drive
Anchorage, Alaska 99515

Alaska Board of Game
2016/2017 Proposed Changes to Regulations
Arctic/Western Alaska
Interior/Northeast Arctic Region



Comments to Interior/Northeast Arctic Region

Proposal 49. Support. The new regulation identified specifically punishes residents. The Board has shown by passing that regulation that they are more interested in being a revenue generator for guides, many of whom are not residents, than they are in protecting the right of Alaskans as granted in our constitution. This regulation requires a resident who hunts with a non-resident family member to go on two separate hunts, one with and one without the family member, if he wants to take an animal. Who can afford that? This proposal should be adopted.

Proposal 50. Support. See comments to proposal 49.

Proposal 51. Support. Where moose and caribou populations are under stress no non-resident hunting should be allowed. Herds are to be managed for the benefit of Alaskans.

Proposal 52. Support, with changes. The cap proposed is too high, no permits should be given to non-residents. Any hunt requiring a permit means that the populations in question cannot support a general hunt. As such, since game is to be managed for Alaskans, non-residents should be given no permits. If Alaskans are being denied permits how can permits go to non-residents? Only if all Alaskans who apply for the permit receive one and there are still permits available should any go to non-residents.

Proposal 53-56. Against. These proposals could have the effect of shutting out Alaskans who do not live in a specific area.

Proposal 57. Support if amended. The cap should be zero. See comments to proposal 52.

Proposal 58. Support if amended. Again the cap should be zero. This should be simple. If permits are required only if Alaskans do not apply for a permit should any go to non-residents. Alaskan hunters must always be given priority. If guides are afraid of not making as much money they should be finding ways to make their services desirable to Alaskans instead of relying on the Board to funnel clients their way.

Proposal 60. Against. No permits for non-residents. If there is a general season then there is no need to cap non-residents.

Proposal 62. Against. See comments to proposal 60.

Proposal 64. Support if amended. The time frame should be increased to ten years and loss of trophy should be included. The penalty should be harsh enough to eliminate the so called honest mistakes.



Proposal 66. Against. There is no prohibition to using a bow during the general season. No special season is required.

Proposal 68. Support.. The majority of moose hunts in Alaska have some type of antler restriction and in these hunts taking a calf in the first year of life is unlawful. This proposal basically makes taking of calves unlawful, which is a reasonable restriction.

Proposal 69. Against. There is no reason for lengthening the season. I am against all special hunts and special seasons. At some point in the future to hunt you will need to be covered by a special season, or weapon, or hunt. It is insane. Hunting is not a sport, it is a means to feed ones family. If people do not want to hunt during the general season then they should not be given special seasons.

Proposal 70. Against. Current law does not prohibit these individuals from hunting. A special season or hunt is unjustified.

Proposal 71. Against. Physical ability or lack there of is not a justification for providing exemptions to the hunting regulations. If, as the proposer states, a person lacks the physical ability to stalk and shoot an animal, how can it be conceived that that individual can properly care the the meat while in the field? This is merely a blatant attempt by a select group to gain an advantage over all others.

Proposal 72. Against.

Proposal 76. Support. This seems reasonable especially if the federal season also changes.

Proposal 77. Support. I agree with the statements made in the proposal.

Proposal 78. Support. This would also align the bear season with the caribou season in unit 19C, so early caribou hunters would be able to take a bear.

Proposal 79. Support. This would increase the take of bear helping the moose and caribou populations.

Proposal 81. Support. This is a logical request.

Proposal 82. Support with amendment. I would support if the number of permits was capped at the lowest number from the time period given. Also the start of the season should be moved to September 1 to give resident hunters first opportunity to hunt.

Proposal 83. Against. When a general hunt can not be supported no permits should be given to non-residents.

Proposal 85. Against. There is already a registration caribou hunt in this area.

Proposal 86. Support. This is a reasonable request and has precedence in the state. I believe that no hunting is allowed within ¼ mile of the Denali Highway near Cantwell, presumably fort he safety of the nearby residents.

Proposal 87. Support. Adoption of this proposal will only help the resource.



Proposal 90. Against. Reasons given are not supportive of increasing the size of the CSH area.

Proposal 97. Support. I agree with the discussion provided by the proposer.

Proposal 101. Against. There is no indication of the number of events or the number of moose to be taken for such events. Adoption of this proposal without an indication of the number of moose to be taken or the type of event that would qualify for a permit would basically be giving a permit to take moose whenever the mood struck. This would be detrimental to the health of the moose population.

Proposal 105. Support. I agree with the points raised in the proposal.

Proposal 109. Support with amendments. Unit 25C should also be included. Current regulations indicate abundant game in this unit. Moving the bear season up would allow for more bear hunting opportunities, especially in Unit 25C as it would open before the caribou season.

Proposal 113. Support. I agree with the points raised in the proposal.

Proposal 117, 118, 119, 120, 121, Support.

Proposal 126. Against. No viable reason given for the date change.

Proposal 128 and 129. Support if amended. If amended to any antlered moose I would support. It appears the population can sustain such a hunt especially since the Fish and Game is proposing an antlerless hunt in this unit (Proposal 125).

Proposal 132. Against. Moving the non-resident season to coincide with the resident season puts the two in conflict. Residents should have priority.

Proposal 141. Support. This is a reasonable request.

*Brian West
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Anch AK 99515*



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
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November 1, 2016

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526
dfg.bog.comments@alaska.gov

Subject: Comments on proposals for February 2017 Interior Region meeting

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 11 and 12, 2016. The SRC reviewed three proposals that will be considered at the Interior Region meeting in February 2017 and would like to provide the following comments:

Proposal 84: Lengthen the trapping season for wolf in Units 12 and 20E

The Wrangell-St. Elias National Park Subsistence Resource Commission supports the proposal as written. Aligning the state and federal season dates for wolf trapping in Units 12 and 20E will provide additional trapping opportunity and reduce the potential for confusion.

Proposal 90: Expand the Copper Basin community subsistence harvest hunt area by adding a part of Unit 12

The Wrangell-St. Elias National Park Subsistence Resource Commission opposes the proposed expansion of the Copper Basin Community Subsistence Hunt area. The Commission is concerned about the potential for increased hunting pressure in Wrangell-St. Elias National Preserve that could result from this expansion. Additionally, the community hunt is not working. In our October 13, 2016, letter to you, we recommended discontinuing the community hunt and starting discussions with stakeholders in the Copper Basin about alternatives to it.

Chair: Karen Linnell; **Members:** Dan Stevens, Don Horrell, Gloria Stickwan, Raymond Sensmeier, Robert Fithian, Sue Entsminger, and Suzanne McCarthy



Proposal 91: Modify the hunting season and bag limits for grouse in Unit 12

The Wrangell-St. Elias National Park Subsistence Resource Commission supports the proposed change in harvest and possession limits for grouse in Unit 12 (5 per day/10 in possession, except 2 per day/4 in possession for ruffed grouse). The Commission does not support the proposed change in season dates, however, and suggests modifying the proposal to drop the proposed change to season dates. For several years, the SRC has been hearing about groups of hunters taking advantage of the current liberal bag limits and harvesting large numbers of grouse within Wrangell-St. Elias. We are concerned about the potential for these high harvest levels to impact the grouse populations, and believe that reducing the harvest and possession limits would help to address this issue. With regard to the proposed modification, some local residents harvest grouse in the winter, and the Commission feels that it is important to maintain that opportunity.

Thank you for the opportunity to comment.

Sincerely,

Karen Linnell

Chair

cc: NPS Alaska Regional Director
Superintendent, Wrangell-St. Elias National Park and Preserve
Governor of Alaska