

Alaska Board of Game members,

On Proposal 67: AOC recommendation is to adopt.

AS 16.05.330(c) Says the board MAY adopt a community subsistence hunt under 5 AAC 92.072 **AS NEEDED** whenever it feels like there is too much harvest of a C&T population by Nonsubsistence users. The statute says the boards SHALL adopt regulations to reduce nonsubsistence harvest to provide for subsistence take. Are the communities hunting in the subsistence harvest hunt area described in 5 AAC 92.074(d) for the Copper Basin Community Subsistence Hunt area losing a reasonable opportunity to harvest game because of Nonsubsistence users?

If so who are they? HT, D, R,C,

Do they need limited? **13.7million lbs in 2010 out of 3.5 billion lbs**

AAC 99.030(a). Says all residents domiciled in the state may participate in a subsistence hunt. It goes on to say that the board can adopt hoops (assigned as conditions 5 AAC 92.050 and 92.052) that you would have to jump through to qualify as a **subsistence user** of a particular C&T population. The BOF chose Athabascan (Ahtna patterns) hoops to qualify in Findings 2006.

Are Nonsubsistence users harvesting game at the expense of harvestable surplus that subsistence users could harvest in the Nelchina? Again who are these "Nonsubsistence users" that makes the board feel like it is necessary to adopt a community subsistence harvest area under 5 AAC 92.072 for the Nelchina Basin?

Are ANSs being met?

Nelchina caribou. 600 – 1,000 ANS. FY2011 – harvest was 2,500. Harvest Objective 3 – 6,000
Moose in GMU 13. 300 – 600 ANS. FY2011 – harvest was 922. Harvest Objective 1 – 2,000

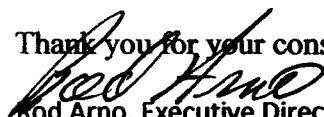
If Nonsubsistence harvest isn't infringing on amount reasonably necessary for subsistence as defined in 5 AAC 99.025(b) and (c), repeal the community subsistence harvest hunt area.

The board can (consistent with 5 AAC 99.071) adopt regulations to allow the department to issue Tier I permits and general drawing permits to allow Nonsubsistence users to take additional animals. **Define nonsubsistence user in AS 16.05.330(c).**

Also #2006 -170-BOG Findings for GMU 13 Caribou and Moose Subsistence Uses needs fixed. 5AAC 99.010(a)(1) through (8) weren't meant to be used to divide subsistence users, the criteria was put into regulation to "identify fish stocks and game populations" that are C&T take.

AS 19.05.258(b)(4)(B)(ii) proximity to domicile is unconstitutional

Thank you for your consideration,



Rod Arno, Executive Director Alaska Outdoor Council

aoc@alaskaoutdoorcouncil.com