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Good afternoon Mr. Chairman, Ladies and Gentlemen of the Board,

My name is Stephen Bartelli and I'm here to represent the Mat Valley Advisory Committee in the matter of the Unit 13 moose and caribou management plan that is currently under so much scrutiny, specifically, the CSH component, which is the catalyst that instigated this meeting.

As I am certain you all have reviewed all of these proposals thoroughly, I would like to just summarize and highlight some of the components of our admission, proposal #14 and explain how we decided on this as a viable solution to, what has become abundantly clear by most accounts, an experiment in subsistence management that is in need of amendment.

Our proposal, in a nut shell, consists of four components regarding moose: A general harvest for bulls using the SP/50-4 rule, an antlerless permit drawing that occurs after the normal hunting season in October and March, 100 "any bull" drawing permits, and a non-resident SP/50-4 bull drawing hunt. All of the bull-only hunts occur during the normal September 1 – 20 time frame. Our assertion and intent, ~~regardless of any incorrect statute language~~, is that the first three components of this plan more than satisfy the requirement for reasonable opportunity for subsistence as long as the moose population levels are maintained above the ANS goals of 300 – 600 animals. Current contemporary data obtained by the Department indicate population objectives are being met or exceeded in all of GMU 13 sub-units. In addition, the bull/cow ratio objectives are all being met or exceeding goals as well. There is no shortage of caribou in this unit as is evidenced by the doubling of the Tier 1 household bag limits in an effort by the Department to achieve their harvest objective. These values are far above the ANS and constitute reasonable opportunity for subsistence as is the method used in almost all other GMU's in the state.

In addition to the fact that the current moose population more than satisfies reasonable opportunity for subsistence, we would also like to highlight the fact that the communities outlined in the proposals crafted by Ahtna enjoy advantages that are unavailable to the vast majority of the user groups that harvest their food supply from this area. Federal lands in unit 13 constitute 4 million acres, or 28% of the unit and, on these lands, federally qualifying residents are allowed one federal "any bull" permit and two federal caribou permits per household. This advantage is not extended to residents outside of these communities. Also, 1.3 million acres, or 9% of unit 13, are posted ANSCA lands that Ahtna ~~has~~ ^{HAS} posted for the exclusive use of its members. This advantage is not extended to residents outside of these communities. The 1979 "Frank" decision also allows for ceremonial harvest opportunity for funerary or mortuary reasons. This advantage is not available to those who have not been awarded a positive finding for C&T. Another unique advantage enjoyed by these communities is the luxury of geographic proximity. Living in close proximity to where you hunt is an advantage that is not intangible. It allows extended time in the field on a more frequent basis. Having to travel several hours to hunt precludes the ability to hunt every day or evening of the entire season. This is not an advantage enjoyed by most of the user groups outside of these communities.

We completely understand the thrust of these proposals and they appear to have the same goal of most of the other proposals that are crafted each and every cycle by many other user groups. Most of these proposals attempt to provide some sort of exclusivity to ^{THE} a user group. Some sort of advantage that will increase their chances of success and fill their freezers. It is up to you, the board, to weigh in on these, allocative requests and decide how to distribute this limited resource that so many households depend on for their food source, regardless of our geographic proximity to a grocery store. Our position is not

intended to be adversarial in nature and, in fact, we join all user groups in seeking a solution we can all live with. After all, each of us desires the same goal; an abundant supply of fresh, hormone-free, meat that was harvested using our own individual customary and traditional means. We understand that this issue has been subject to many court cases and is complex in nature with a long history. Still, it has not escaped our notice that in every other case we could think of where a user group is somehow disadvantaged in its access to a public resource, governments, as a rule, usually provide some sort of assistance or subsidy to these groups to help level the playing field for all those seeking the resource. Helping the disadvantaged compete with those who have the advantage. Some examples of these equalizers are Affirmative Action, Title 9, and the 8(A) business development program, the latter of which many of the native corporations participate in to help mitigate their business disadvantages. But in the case of unit 13 moose harvest, it is not the communities in the Copper Basin that are disadvantaged. In fact they are the user group with many advantages that are not enjoyed by other groups. Still, it is the Copper Basin communities that are requesting the additional advantage of having the entire allocation of "any bulls" exclusively to themselves. If the moose population is above the ANS, as the Department has determined it is, and resource abundance is the ^{primary} method used to determine reasonable opportunity for subsistence, which it is throughout the rest of the state of Alaska, then there is no need for the CSH program at all.

We believe the 100 "any bull" tags they seek may actually be exacerbating their desire to limit competition, and are thus limiting their chances of success. The opportunity to harvest the first bull moose that you see is a benefit that has not escaped many of the resident hunters in this state and the large number of CSH participants around the state are indicative of that. This, and the requirement to hunt moose in the same unit that you hunt caribou under current Tier 1 rules, are attracting large numbers of hunters and concentrated harvest effort to this unit. We believe that if this "paired species hunting" requirement were removed, and the "any bull" opportunities were either removed or transferred to a draw system, some of the concentrated effort in this region would be eliminated, which would in turn, eliminate some of the competition for this food source and further increase opportunity for subsistence for all who hunt in unit 13. We believe that all Alaska residents that harvest their food supply from natural sources are subsistence users.

There are many suggested solutions to solve this complex issue embedded in these proposals before you. Some, as you will note, are better than others. In any case, it is clear that many of the user groups involved are unhappy with the status quo and a change that provides a less complex, less restrictive harvest opportunity would be welcomed by all.

On behalf of the Mat Valley Advisory committee I would like to thank all of you for your time and consideration in this matter and for reviewing our proposal as a possible component to be used as guidance in your pursuit of a viable solution.

Mat Valley AC

Jennifer Ehman, Chair

Stephen Bartelli, Member