

My name is Rebecca (Becky) Schwanke. I grew up in Tok hunting Unit 12 and 20E, I have lived in Juneau, Fairbanks, Anchorage, but for the past 15 years I have been a local resident of Tazlina. My family and I actively hunt, trap, and fish in Unit 11, Unit 13, adjacent units, and others across the state depending on the availability of resources at the time. In my volunteer time I teach hunter education, conservation and outdoor skills to youth, as well as field dressing, black bear hunting, and moose hunting to women at BOW (Becoming an Outdoors Woman).

I want to preface my comments by saying I have met some great people in my 15 years in the Ahtna Region, many are here today. I fully respect every individual that makes a real effort to get out and harvest wild foods, and while we may not share the same history, I believe many of our values overlap.

I had the privilege of working as a Wildlife Biologist for ADF&G in Glennallen for 12 years. I helped administer this Community Hunt for its first 5 years, as well as the Unit 13 Intensive (wolf) Management Plan. I have witnessed the moose and caribou populations steadily increase. While it takes a bit more effort to successfully harvest a moose or caribou, away from the crowds in Unit 13 now, it does not necessarily require expensive equipment. I have taken caribou, moose, black bear, and Dall sheep on foot in this region, and I have helped kids take their first big game animal here this same way.

I would like to address **Proposal 1**. While I recognize a strong desire by Ahtna to formally recognize a portion of the local area moose population for their "community" in ANS regulations – the requested 100 bull moose that do not meet other antler size restrictions in the area – is not something that can be adopted without accepting a monumental shift in how you establish ANS for every game species across Alaska, not to mention a dynamic ANS that changes as antler size regulations change.

If you establish a moose ANS for Ahtna "communities", you will also need to follow this action with establishment of an ANS for every non-Ahtna community across Alaska from which Unit 11 and 13 moose hunters hail. In addition, there are approximately 140 Big Game populations that currently have a positive ANS finding under 5AAC 99.025, 33 of these are moose populations. The complexity and time commitment of parsing out ANS across this state is simply not feasible.

It is misleading for Ahtna to request only non-antler legal bulls for their ANS, when Ahtna hunters have harvested spikes, forks, and bulls over 50" in Unit 11 and 13 for many years under the State general season as well as Tier I and II hunts. I find it odd that it is only now that the CSH hunt has become unworkable, that this theme of needing the "Any Bulls" (those non-antler legal bulls) is solidifying. I have a difficult time understanding how antler legal bulls are now deemed insufficient to meet subsistence needs.

When the Board applies subsistence law, under 5AAC 99.010, it is directed to identify "game populations, or portions of stocks or populations" traditionally used for subsistence, it seems clear the original intent was to identify "portions" within geographic areas, not within the population itself. With 140 big game populations with a positive ANS finding, none currently specify, in codified regulations, an individual sex, age, or size class of animal. Proposal 1 would bring a precedent I'm not sure you could live with, being exceptionally expensive and destructive going forward.

--Without getting into the details, the local CSH moose and caribou hunts since inception in 2009 have resulted in many thousands of hours of ADF&G staff time. From one group to 73, the hunt has grown out

of control. New groups formed each year, many long-time Unit 13 hunters – agreeing to salvage requirements unlike anything else in the state – solely because CSH hunters were accessing their traditional hunting areas up to 3 weeks before the general season, and taking a large number of bulls from spikes up to 50"+ out of the population. If you can't beat 'em, join 'em was the mantra. Add on a few more groups that flocked to the open designated hunter option, and here we are. From the warm early seasons to the excessive salvage requirements, basic edible meat is wasted every year in this hunt. I have watched it year in and year out. It's alarming, it's sad, and it needs to stop.

While there is a desire to fix the CSH hunt by some, do not forget the number of proposals you received asking for this hunt to be eliminated. If you consider **Proposal 44** as an avenue to fix the CSH hunt, I caution this just delays the inevitable special Board meeting we will be having 4-5 years from now, to once again fix the CSH. If Proposal 44 passes, it would only be fair to eliminate all existing CSH groups in this area. With the requirement to set bag limits, season dates, and other regulations individually per community, per proposal, I can already see the State Hunting Regulations growing by 70 pages or more, outlining the details of each new individual community CSH. The season and bag limit combinations are endless.

Consider as well, as each new community comes forward to request their own hunt, based on their own subsistence traditions, the Board would be required to draft new Findings for each new community outlining their long-term, consistent use of the area's resources. As communities individually plead their case to get back into the CSH, do you just take their word per their C&T patterns? What proof will you require? Some are pretty good story tellers. It won't take long to get backed into a corner as the new groups all bring requests of 25, to 50, to 100 bull moose? Are you willing to allocate all 600 moose in the ANS to community groups? What portion of the ANS will be allocated to the subsistence hunters that testified they just want to hunt in the general hunt?

I understand the desire by some of you to make this hunt work. We all would love to come to the next Board meeting and have no user conflicts in Unit 13. After 15 years here, I don't see that happening.

If you can agree it's necessary to move on from the CSH, I ask that you carefully review caribou Proposal 33 and our suggested changes in RC8, as well as moose Proposal 43 and our suggested changes in PC6.

With one additional change, bringing back standard proxy regulations for our general season moose hunt, the hunts we propose offer stability for the public, management flexibility for the Department, and subsistence opportunity for those who need it.

Thank you for your time.