

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management

1011 East Tudor Road M/S 121

Anchorage, Alaska 99503

RAC 17014.KW

FEB 16 2017

Kristy Tibbles, Executive Director
Board of Game
Alaska Department of Fish and Game Boards Support
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: Comments on the Alaska Board of Game Proposals for the Interior/Northwest Arctic Region

Dear Ms. Tibbles:

I am writing on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on a number of Board of Game proposals for the Interior/Northwest Arctic Region.

The Council is one of ten regional advisory councils formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Eastern Interior Region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions that may impact subsistence resources critical to Federally qualified subsistence users whom the Council represents.

The Council held a public meeting on February 7 and 8, 2017, in Fairbanks, during which the Council discussed various proposed changes to the State of Alaska hunting and trapping regulations. Specifically the Council discussed and voted on:

- Proposal 47. Change the definition of "edible meat" for game birds. The Council felt it was helpful to put into regulation an existing practice of salvaging all usable meat. The Council voted **unanimously to support Proposal 47.**
- Proposal 51. Prohibit nonresident hunting of any prey species under intensive management in the Interior/Northeast Arctic Region until harvest and population objectives are met. The Council felt that the proposal is an unnecessary restriction to non-resident hunters. The Council voted to **oppose Proposal 51.**

- Proposals 57 – 62. Establish a cap on non-resident harvest of Dall sheep. The Council voted on this series of proposals as a group. The Council felt these proposals would limit the number of non-residents that hunt in the State. The Council voted **unanimously to oppose Proposals 57 through 62.**
- Proposal 66. Open an archery-only hunting season for Dall sheep in the Interior/Northeast Arctic Region. This proposal would provide special privileges to a small user group, giving bow hunters an extra week compared to other hunters. The Council voted **unanimously to oppose Proposal 66.**
- Proposal 71. Allow the use of crossbows in archery hunts in Unit 20 for hunters over 60. The Council noted this would provide a special privilege to a select group of people by allowing only elders to use crossbows instead of traditional bows. The Council voted **unanimously to oppose Proposal 71.**
- Proposal 72. Allow the harvest of wolf and coyote by land and shoot with a trapping license in the Interior/Northeast Arctic Region. This is a very effective method of harvesting wolves that can help to resolve problems attributed to large wolf populations and potentially manage their populations. A concern was expressed that some people might use this as an opportunity for aerial hunting, claiming that they landed and then shot. The Council voted **unanimously to support Proposal 72.**
- Proposal 86. Close an area ¼ mile on either side of the Taylor Highway to hunting during caribou season, and limit the number of permits. Some Council members were of the opinion that the proposal is not enforceable; at the same time all, Council members recognized the existing serious issue of unsafe shooting. The Council voted to **support Proposal 86**, passing by a close margin of 4 to 3.
- Proposal 101. Create a regulation allowing the harvest of moose under a permit for “celebration of life” events. The Council expressed support for the proposal, noting it would authorize an existing practice, which is a part of cultural and spiritual wellbeing, to continue without having moose harvest available for memorial purposes. The Council felt that a limit on the number of moose to be harvested should be set. The Council voted **unanimously to support Proposal 101.**
- Proposal 104. Expand the bag limits for caribou in Units 24A, 25A, 25D, 26B, and 26C. Liberalizing hunting for the Porcupine Caribou Herd will enlarge the sport harvest, which in turn would create increased competition for a progressively limited resource – caribou. The Council is concerned that this proposal will lead to an influx of hunters from other areas. Another concern is that taking proper care of meat during the late spring/early summer when temps are high may pose a problem. The Council voted **unanimously to oppose Proposal 104.**
- Proposal 108. Reevaluate the customary and traditional use finding for brown bear in Unit 25D. This will give a finding of customary and traditional use to people in Fort Yukon to hunt brown bears in Unit 25, which is a traditional hunt for the people in that community. The Council voted **unanimously to support Proposal 108.**
- Proposal 109. Lengthen the brown bear hunting seasons in Units 25 and 26. The proposal would actually shorten the season in Unit 25D. The Council voted **unanimously to oppose Proposal 109.**

- Proposal 110. Increase the bag limit for black bear in Unit 25B. Increasing the bag limit opportunity in Unit 25B from 3 to 5 black bears would present no biological concerns for the population. The Council voted **unanimously to support Proposal 110.**
- Proposal 111. Open a snaring season for black bear in Unit 25D. The use of neck snares in the harvest of bears has been a traditional practice for the last 50 years, akin to harvesting wolves. The snares are set in a specific way not to harvest ungulates. The Council expressed an opinion that foot snaring was probably used in prehistoric times, so it may be considered a traditional method as well. The Council voted **unanimously to support Proposal 111.**
- Proposal 112. Allow same-day airborne hunting for wolf in Unit 25D. The Council supports the establishment of a predator control program in this area so that same-day airborne wolf hunting can be implemented. The Council voted **unanimously to support Proposal 112.**
- Proposal 113. Modify the resident bag limit for Dall sheep in Units 24B, 25A, 26B, and 26C. The Council noted it was an important conservation measure to restrict the harvest of sheep to just rams in order to preserve the declining sheep population. The Council voted **unanimously to support Proposal 113.**
- Proposal 115. Lengthen the trapping season for lynx in Unit 25. This will allow trappers to use their discretion to keep or dispose of lynx trapped incidentally during March when lynx fur is no longer of good quality. The Council voted **unanimously to support Proposal 115.**

Finally, the Council elected members Bill Glanz, Chair for the Central Advisory Committee, Andrew Firmin of Fort Yukon, Vice Chair for the Yukon Flats Advisory Committee, and Virgil Umphenour of North Pole, Chair for the Fairbanks Advisory Committee, to represent the Council's position on the aforementioned proposals at the Board of Game meeting to be held in Fairbanks on February 17 – 25, 2017.

If you have any questions regarding this correspondence, please contact Katerina "Katya" Wessels, Subsistence Council Coordinator, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or at katerina_wessels@fws.gov.

Thank you for your consideration.

Sincerely,



Sue Entsminger, Chair

cc: Eastern Interior Alaska Subsistence Regional Advisory Council
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Stewart Cogswell, Acting Deputy Assistant Regional Director,
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Managements
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Robbin La Vine, Acting Anthropology Division Chief,
Office of Subsistence Management
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management
Katerina Wessels, Subsistence Council Coordinator, Office of Subsistence Management
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Administrative Record