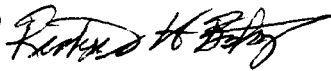


To: Alaska Board of Game

From: Richard H. Bishop

Date: 2/17/2017



My comments on proposals before you at your February 17-25, 2017, meeting follow:

Proposal 52:

I favor effective preference for Alaskan resident hunting and trapping of wildlife, consistent with Article 1, section 23, and Article 8, sections 2, 3, 4, and 17 of the Alaska Constitution. However, I do not support this proposal as written, for these reasons:

1. I am wary of a statute or regulation that applies a sweeping single standard to a broad array of situations that are likely to individually include unique circumstances that, to accomplish management that best meet constitutional goals may demand unique species and population specific management strategies. For example, management of a population of prey species such as moose may be very different than managing a population of predators such as brown or black bears. It may be that a cap on either resident or nonresident harvest by humans could frustrate efforts to meet constitutional goals.

2. There are many ways to provide resident preference. In the 2016-17 hunting regulations I found no less than 240 regulations providing some advantage to residents. The amount of advantage ranged from slight to substantial, and included everything from exclusion of non-residents to permitting requirements to differences in season length, bag limit, age criteria, or other elements. These differences were obviously enacted to meet unique circumstances. Clearly they did not satisfy everyone's priorities or there would not be proposals like #52 before you. But they demonstrate that "there's more than one way to skin a caribou."

3. One common rationale for a 90/10 or similar resident/non-resident split in opportunity or harvest is its use in other states. That is useful information. Apparently it works well for those states, both in terms of providing for residents and in terms of licensing income for those states' wildlife departments. But I have heard of no objective or advocacy analysis (for or against) comparing the financial effectiveness in one or more of states with a broad resident preference to the system in place in Alaska. Numerous examples of license and tag fee differences have been provided, but is there any comprehensive analysis of whether a licensing structure used elsewhere would be better for Alaska, and be compatible with Alaska's management need?

4. There may be merit in the 90/10 resident/non-resident model. I recommend that if the Board is so persuaded that you first apply it only to two "hot spots" – Dall sheep and brown bear – and maybe in only some locations. I also recommend that you consider that proposals 53-56 may address the resident preference need.

Proposals 53-56:

I recommend that the Board seriously consider these proposals. I have not thoroughly examined them but it appears they may address the desire for a stronger resident preference. They also emphasize the important principle in state law that all Alaskans are eligible to participate in subsistence uses, as frequently forgotten or ignored by proponents of a more discriminatory subsistence priority.

Proposal 75:

I have no objection to the use of dogs to hunt coyotes, but I am concerned about possible problems in relation to trapping – for both the dogs and the trapping effort.

Proposal 47:

I support this proposal but would add heart, gizzard, liver, and humerus part of the wing to “edible meat” of waterfowl or game birds. They are too good to feed foxes.

Proposal 93:

I oppose this proposal. Rather than tacitly agreeing in advance to whatever ~~lo~~-sided restriction BLM may come up with on the Bettles Winter Trail, the State of Alaska should confront BLM with the position that further restriction of public use is unacceptable. Is the trail an RS2477? If so, all the more reason.

Proposal 98: I support

Proposal 99: I oppose. Fur primness should be a basic requirement.

Proposal 113: I strongly support. Continued ewe harvest in that situation is unacceptable.

Proposal 114: I oppose this proposal. Fur primness should be a basic requirement.

Proposal 135:

I support this proposal in concept, but it lacks a boundary for “western 20C” north of the Kantishna River. Maybe a line from the mouth of Toklat River to origin of Zitziana River/GMU 19B boundary would be appropriate?

**Proposal 141:**

I compliment Denali National Park and Preserve on coming up with a compromise proposal that is based in part on a reasonable scenario relating to wolf biology. BUT I oppose this proposal for several reasons:

1. The shaky rationale that the previous buffer zone significantly favored more wolf sightings;
2. Lack of information on available wolf prey in the Park in general and status of the Denali caribou herd in particular;
3. The NPS failure to negotiate in good faith for a land swap with the State to acquire the Wolf Townships for the Park years ago, and other heavy-handed tactic to squeeze out uses such as mining around Kantishna, which though allowed by ANILCA were deemed incompatible;
4. The current unwarranted NPS regulations overriding state regulations for taking predators on NPS Preserves in Alaska; the lawsuit they prompted should be settled first;
5. Lack of acknowledgement that to accept this proposal represents a one-sided “compromise” in which the state would concede another increment of its responsibilities in Alaska wildlife management, when it is already overburdened with federal rules on 60% of Alaska lands.

This debate could go on a long time. I suggest that a new approach be considered. If Denali Park and Preserve must have a buffer—with or without a restricted wolf season—then the State only agree if its game management goals are adequately compensated. One recommended often is to restore sheep hunting in Gates of the Arctic and Wrangells-St. Elias Parks. I suggest that the Interior Department adopt a policy of providing “predation credits” similar to the scheme for “carbon emission credits”. In return for added protection of Denali Park wolves, the Interior Department would agree to non-objection for a pro-rated number of wolves to be taken on federal lands where predator control is needed to meet Alaskans’ needs and state management responsibilities.

Given the apparent imperative of Denali Park and Preserve to show tourists a wolf, I would think the Interior Department would be willing to agree to a couple hundred or so “predation credits”, which could be enough to provide relief to a critically depressed prey population identified by the state, for example on Umnak? Island or Yukon Charley Preserve, Yukon Flats Refuge, etc.

**Proposal 142:** I oppose. See comment on Proposal 141.