



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436  
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

RC 011

## **Comments to Alaska Board of Game Region IV Meeting February 16-23, 2018**

Proposals we support: 78, 96, 112, 124, 127, 129, 131, 132

Proposals we oppose: 102, 126, 141, 145, 146, 147

### **Proposal 78 – 5AAC 85.045(12) Hunting seasons and bag limits for moose**

#### **SUPPORT**

We need more resident-only any-bull hunts in areas where moose populations have increased, and additional harvests can be sustained.

---

### **Proposal 96 – 5AAC 85.045 Hunting seasons and bag limits for moose, and 92.072 Community subsistence harvest hunt area and permit conditions**

#### **SUPPORT**

This is the most reasonable and rational proposal regarding the CSH moose hunt in Unit 13. The Board continues to attempt to give a priority to one group of residents over another for a moose population that is not in a Tier situation. This does not comport with our state laws governing subsistence and the Tier system, and only ends up costing the state time and money with subsequent court cases.

The original CSH proposal was as much to do about proxy hunting as it was to create an earlier any-bull season for the 8 Ahtna communities. In moving away from a CSH hunt structure to a registration hunt, the Board should also eliminate the Unit 13-specific proxy regulations to allow proxy hunting of moose in the unit.

---

### **Proposal 102 – 5AAC 85.025 Hunting seasons and bag limits for caribou**

#### **OPPOSE**

In 2017, 25,000 Alaska resident hunters applied for and were denied a DC 485 Nelchina caribou permit. Resident Hunters of Alaska (RHAK) does not support this proposal because it expands nonresident hunting opportunities at the same time 25,000 Alaskan hunters are being denied a hunting opportunity.

---

### **Proposal 126 – 5AAC 85.025 Hunting seasons and bag limits for caribou**

#### **OPPOSE increase in nonresident bag limits**

**Resident Hunters of Alaska (RHAK) Board of Game Comments  
Region IV Meeting February 16-23, 2018**

RHAK firmly believes that caribou allocations to nonresidents should never exceed a two-caribou bag limit. Past experiences where nonresident hunters were allowed a bag limit of up to 5 caribou have shown it increases wanton waste abuses. Nonresident hunters are typically not after the meat and there is no justifiable rationale to allow nonresident bag limits beyond two caribou.

We fully support increasing the bag limit for residents.

---

**Proposal 127 – 5AAC 85.025 Seasons and bag limits for caribou**

**SUPPORT**

RHAK supports the RC504 portion of Unit 9C to be included in the RC503 permit area, to better allow access and hunting opportunities for the Mulchatna Caribou herd.

---

**Proposal 129 – 5AAC 85.045 Hunting seasons and bag limits for moose**

**SUPPORT**

The Department has no biological concerns with an increase in moose harvest that would result from extending the resident season five days, as this proposals requests. We support expanding resident moose hunting opportunities when populations can sustain the additional harvest.

---

**Proposal 131 – 5AAC 85.020 Hunting seasons and bag limits for brown bear**

**SUPPORT as amended – limit nonresident opportunity**

This is a RHAK proposal that originated from our membership and was further developed after talks with Department staff. At the time this proposal was submitted, 10 months ago, the Department had no conservation concerns for brown bears on the peninsula in Unit 9. The management objectives to retain a high density of bears with a 60 percent male harvest with 50 of the harvested males being over 8 years of age has been met every season since 1982.

Resident bear hunters in Unit 9 face unbelievable competition from guides and their unlimited nonresident clients. Nonresident hunters consistently harvest 80 percent of the bears under the combined RB 368, 369, and 370 permit hunts. This unlimited competition often results in lack of access, conflicts afield between guides and resident hunters, and lower resident success rates. This is the issue we wanted the board to address, giving resident hunters another biennial cycle and more opportunity to hunt bears in Unit 9 without such a high level of competition, by removing the one-every-four years requirement for residents.

We have recently learned that the Department does have conservation concerns with the Unit 9 brown bear population, which are addressed in their Analysis and Recommendations. The Department even goes so far as to say that current harvest levels may not be sustainable. In that regard, perhaps our proposal will serve as a wake-up call.

We submit that the continued high nonresident guided harvest of Unit 9 brown bears is the driving factor in any bear conservation concerns the Department now has. And this seems to be a pattern with the Board of Game allocating unlimited nonresident opportunity until conservation concerns are raised and then both residents and nonresidents are restricted.

**Resident Hunters of Alaska (RHAK) Board of Game Comments  
Region IV Meeting February 16-23, 2018**

We recommend the board consider limiting nonresident hunters to draw-only permits with a limited allocation and allowing resident hunters to continued hunting under registration permits.

We stress that if any changes are made that nonresident hunters should bear the burden of any new restrictions.

---

**Proposal 132 – 5AAC 85.020 Hunting seasons and bag limits for brown bear**

**SUPPORT as amended**

This is a RHAK proposal designed to give resident brown bear hunters in Unit 9 a leg up on continued unlimited competition with nonresident guided hunters.

Currently, the resident and nonresident seasons under the RB 368, 369, 370 registration permit hunts fall at the same time. This has created enormous conflicts between resident and nonresident guided hunters and guides, and a stifling of resident opportunity and success.

Nonresident guided hunters consistently take 80 percent of the bears in Unit 9. Allowing resident hunters an early start for both the even and odd-numbered year permits would help cut down on conflicts and give residents a better hunting experience and opportunity to harvest a bear.

At the time we submitted this proposal, the Department had no conservation concerns for brown bear in Unit 9. The Department now says that they have concerns that the current harvest of Unit 9 brown bears may not be sustainable.

The major predator of Unit 9 brown bears is the nonresident guided hunter. Allow residents an earlier season, and limit nonresident hunting that is the overwhelming mortality of Unit 9 brown bears of all ages and gender, so that overall harvests do not increase.

---

**Proposal 141 – 5AAC 92.069 Special provisions for moose drawing permit hunts**

**OPPOSE**

RHAK continues to strongly oppose the addition of more species to the "must-be-guided" list under AS 16.05.407/408. While the board claims that they are not adding species to the list under statute, only adding specific must-be-guided hunt requirements for certain permit hunts, we firmly believe the legislature never intended for the board to have this authority.

The board should not be in the business of providing guaranteed business to big game guides. Moose should never be a required must-be-guided species for any hunt.

---

**Proposal 145 & 147 – 5AAC 85.025 Hunting seasons and bag limits for caribou**

**OPPOSE**

RHAK opposes allowing any nonresident hunting at all for ungulate populations that are under a current active intensive management program and below either the population or harvest objectives.

The Mulchatna caribou herd is well below population and harvest objectives and ANS numbers are not being met. There should be no nonresident hunting allowed until the herd

**Resident Hunters of Alaska (RHAK) Board of Game Comments  
Region IV Meeting February 16-23, 2018**

is out of active IM predation control efforts and the population or harvest objective is reached.

---

Thank you to Board of Game members for your service, and Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)  
[www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)