

## Central/Southwest Region Proposals

### (3 - Deferred Proposals from Statewide Meeting)

#### Comments:

We support the Board's effort to redefine the term "community" in a way that will make it clear that a participating group is genuinely a "community" and not a sham group put together to abuse the community hunt opportunity. We suggest getting rid of the term "group" as it is unnecessary and detracts from the intent of the new definition – to clarify that participants are a "community." We also suggest including a provision that the community members routinely interact in person rather than just through facebook to prevent the "internet community" from meeting the definition.

#### Comments:

We support Proposal 58 to modify the salvage requirements for moose and caribou must have all meat stay naturally attached to the bone.

Meat is not regulation to require meat be attached to the bone during the winter GMU 13 caribou hunting season, nor is meat required to be attached to the bone for a GMU 13 Moose CSH winter hunt. It is in regulation, although a winter hunt has not been held for a few years.

Caribou meat is wasted during late October hunt, when meat is harvested and is not attached to the bone. Hunters do harvest caribou during the late October hunting season, they do not keep meat attached to the bone, meat is spoiled.

We oppose Proposal 59 to modify Tier II questions on "location of purchase of most of applicant's gasoline and groceries during the last year and number of days in the local hunt area spent on subsistence activities".

ABOG must implement Tier II for a wildlife population when there is not enough harvestable surplus to provide a reasonable opportunity for all subsistence uses of that population. The subsistence statute requires that eligibility for a Tier II permit shall be based on 2 criteria: (i) the customary and direct dependence on the Tier II game population by the subsistence user for human consumption as a mainstay of livelihood; and the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated. The scoring system in this proposal would not accurately, fairly or legally measure these statutory criteria.

We oppose allowing points for each living generation to apply to Tier II subsistence hunting permit point system. The current regulatory scoring system measures "customary and direct dependence on the game population by the subsistence user for human consumption as a mainstay of livelihood" far more accurately than how many living relatives an applicant has.

Obtaining points for living relatives for Tier II subsistence hunting permit points just doesn't make sense. It would be unfair, if grandparents have passed on for a few individuals, while other

households may still have living grandparents. Or if a parent or parents have also passed, some applicants would not receive points for deceased relatives.

The proposal's suggestion to "consider all the subsistence activities use days for all hunt-fish-pick berries subsistence reliance and dependency of the applicant, no matter where applicant lives in the state or exercised subsistence use rights" does not measure the customary and direct dependence for subsistence uses on the wildlife population that is the subject of Tier II scoring. Measuring dependence on a moose population in a different hunting GMU does not measure dependence for the moose population that is the subject of the application. Moreover, the proposal mistakenly asks that the current scoring system be applied no matter where an applicant lives and that is of course exactly how the regulations are implemented now, residence is not a factor.

The proposal's third suggestion suffers from the same problem in suggesting that hunting for any population statewide should count for measuring dependence on the particular moose population at issue. Considering how many years an applicant has applied for Tier II and other Tier I or Tier II hunt does not prove reliance and dependency upon the resource, it just proves that an individual has filled out a Tier I or Tier II application for an indiscriminate number of years. Also, the suggestion that only hunting be counted for scoring ignores the fact that many subsistence users fully depend on a population for their mainstay of livelihood, but may not be able to do the hunting for that population, for example elders, widows and the disabled. Instead they share in the other parts of the subsistence way of life, such as processing, sharing knowledge, teaching the youth, and in turn they share in the harvest that others in their communities provide.

Tier II applies to those who have dependence on reliance upon the resource for food. It does not apply to handicrafts made from inedible parts. Making handicrafts out of inedible parts of wildlife is not a CSH hunt condition, nor should it be.

## **Regionwide, Multiple Units & Other Regions**

### **Comments:**

We oppose Proposal 71 to allow the use of crossbows in restricted-weapons hunt. GMU 13 is an impacted hunting area during the hunting season, local hunters do not need to have another special crossbow hunting season. Crossbow hunting could be dangerous in the field with all other hunters out hunting for moose and caribou.

### **Comments:**

We oppose Proposal 72 only in GMU 11 and GMU 13 to establish archery-only registration hunts for moose. Unit 13 is already an over-crowded area to establish an archery hunt for moose. GMU 13 doesn't need to have more hunters in the field with different hunting seasons. Unit 11 doesn't need to have an archery only moose hunt. It may not be crowded, but it may become dangerous hunt in GMU 11, without much enforcement to monitor hunters in the field.

### **Comments:**



See comments under Proposal 72.

**Comments:**

We oppose Proposal 74 to remove the nonresident bag limit restriction of one Dall sheep every four years in the Central/Southwest Region to one ram every regulatory year.

Alaska residents who hunt for sheep have voiced their opinion at ABOG meetings against this proposal. Residents in the State of Alaska have complained about too many people hunting sheep and harvesting them before they get a chance to hunt for a sheep.

GMU 11 Sheep has a positive finding for Sheep, ABOG must ensure that reasonable opportunity is provided to subsistence hunter to hunt for sheep.

**Comments:**

See comments under Proposal 74.

**Comments:**

We support Proposal 76 to reauthorize brown bear tag fee exemption for the Central/Southwest Region. Resident tag cost to take a brown bear will discourage hunters from hunting for them. Brown bear population in Alaska is not a conservation concern, more brown bears should be harvested to protect caribou and moose calves.

## **Glennallen Area – Units 11 & 13 (33 Proposals)**

**Comments:**

We oppose Proposal 91 to modify the amount reasonably necessary for subsistence for caribou and moose in Unit 13. Alaska Board of Game determined that ANS for caribou and moose is based upon all data reports from hunters, interviews on C&T uses in communities, data is gathered through research studies on a communities' way of life and culture, also includes other soci-economic indicators and reports.

Data gathered through moose and caribou harvest reports will provide inadequate C&T uses and patterns on uses of wildlife and fish. Gathering data through Sports harvest and Personal Use permit reports will only include non-subsistence information, it will not include eight criteria to determine C&T patterns and uses of fish and wildlife. Seasonal C&T patterns and uses of fish and wildlife has to be included in customary and traditional use research to determine subsistence uses and patterns for rural communities.

**Comments:**

We strongly oppose Proposal 92 to repeal the current community subsistence hunt for the Copper Basin area. Community Subsistence Hunt should be reviewed to improve upon it, it should not be removed from regulations. CSH hunt is providing local and statewide hunters moose and caribou to provide meat to their families. CSH hunt provides a lengthier hunting season for moose for all Residents in Alaska. It provides more opportunity to harvest a moose, thirty days of a subsistence hunting opportunity would be lowered to twenty days to a general season hunt.

Subsistence preference for hunting moose and caribou would be removed from regulations. Alaska Board of Game has statutory mandate to provide for reasonable opportunity to harvest a moose and caribou. According §Sec. 16.05.258, ABOG must provide subsistence preference to residents of Alaska for all consumptive users and if resources are scarce then Tier II is to be implemented for fish and wildlife. ABOG must provide a reasonable opportunity to hunt for moose and caribou.

Because federal hunting regulations is not within State control, ABOG should not rely on it to meet subsistence needs. We believe there may be legal problems with doing so as well. But even if it were legal to rely on federal hunting regulations to provide for subsistence needs, it would not provide enough opportunity for cultural and traditional resource use. Federal public lands in GMU 11 is largely inaccessible, even to federally qualified subsistence hunters. Copper River has to be crossed to hunt on federal lands in the park and preserve. Very few people can afford to pay for a flight to reach hunting areas across the Copper River. Two accessible roads in Nabesna and Chitina areas are narrow and it is difficult to hunt on federal lands in these areas because people own homesteads along the roads. In other words, federal public lands do not adequately provide subsistence opportunities; CSH is necessary in order to do so.

**Comments:**

We strongly oppose Proposal 93. See comments under Proposal 92.

**Comments:**

We strongly oppose Proposal 94. See comments under Proposal 92.

**Comments:**

We strongly oppose Proposal 95. See comments under Proposal 92.

**Comments:**

We strongly oppose Proposal 96. See comments under Proposal 92.

Re

**Comments:**

We oppose Proposal 97 to remove the requirement for applicants to have specific Customary and traditional (C&T) use patterns for participating in the CSH in GMU 13. Community Subsistence hunt is a subsistence hunt, it is not a racially based subsistence hunt. As the Proposer is well aware, his argument to the contrary has already been struck down repeatedly by Alaska courts. This Proposal is a deliberate attempt to misrepresent the legal status of the CSH.

Indeed, only a very small minority of hunters in the CSH in 2016 and 2017 were Ahtna or from the Ahtna region. Most of the "communities" that obtained tags under the CSH and claimed to have a culture and tradition of community use that complied with the terms of the CSH were not Ahtna Athabaskan. Aside from being legally bankrupt, the unsupported assumptions that underlie the Proposal are plainly false.

Alaska Board of Game has legal authority to differentiate between subsistence hunts. According to Sec. 16.05.258 (1) (c) "if the "harvestable portion of the stock or population is sufficient to provide for all consumptive uses, the appropriate board shall adopt regulations to differentiate among consumptive



uses". Alaska Board of Game adopted findings entitled, 2006-170-BOG and 2011-184-BOG, to support the Ahtna have customary and traditional uses and patterns of caribou and moose, which is different from other consumptive uses.

**Comments:**

We support Proposal 98 to change 5 AAC 92.072 to remove the terms "group and residents" add community and member, conforms to with the definition of "community" in section (i) of this regulation, require annual reporting and 5 year reporting for a community that has demonstrated C&T use patterns as found in board findings for the hunt area, scoring system and approval by Department, community failing to submit a report that meets C&T use patterns shall not participate in CSH in the following 2 years and provides for an appeal process, if a community demonstrates C&T use patterns that community will be exempted for 5 years to submit a CSH report.

Adding community and members will to 5 AAC 92.072 will ensure that regulations are based upon a "way of life" that has strong customary and traditional patterns of uses of moose and caribou. Community adds more strength to the regulation in that it shows interaction between members conforming to C&T patterns of use found in Board of Game Findings - 2006-170-BOG Finding and 2011-184-BOG Finding.

Community Administrators that show C&T use patterns in their annual reports should only have to report once every 5 years. Substantial evidence of conforming to 8 criteria listed in 5 AAC 92.072 should prove that community have reliance upon a variety of resources, hunt, fish and gather seasonally within GMU 11 and GMU 13, continue to pass down knowledge on preserving, processing wild game, fish and plants, have sharing patterns, stories, lores that are passed down from generation to generation, use moose and caribou parts listed as listed in community subsistence hunt conditions.

Scoring system and approval by Department reviewing CSH Community Representative and members to participate in CSH should be approved to allow for scoring system to provide proof that CSH members are complying with 8 hunt conditions. An appeal process within 60 days should be added to allow a community to challenge Department's decision or to change their report to meet C&T patterns of uses requirements.

**Comments:**

No comment.

**Comments:**

We support Proposal 100 to remove Unit 13 Tier caribou requirement to hunt moose in Unit 13. GMU will be less crowded with less hunters in Unit 13, if hunters were able to hunt elsewhere in the State for

**Comments:**

We oppose Proposal 101 to add a youth caribou hunt in GMU 13 with open season date from August 1-5. Youth can hunt with family members. Families should hunt together during regular caribou hunting season. Youth have an opportunity to learn how to hunt and harvest a caribou during hunt season. A special caribou hunting season should not be created just for them to learn how to hunt for caribou.

**Comments:**

We oppose Proposal 102 to open nonresident hunting season in GMU 13 until the fix up the Copper Basin Community Subsistence hunt.

**Comments:**

We oppose Proposal 103 to align the community subsistence hunt with general season dates – September 1 through September 20.

ABOG has to comply with §Sec. 16.05.258, subsistence uses are to be provided for. Aligning same General Hunt with community subsistence hunt does not provide for a reasonable opportunity to harvest a moose to provide moose meat for families who have a reliance upon moose to supplement food sources.

Twenty days of hunting in GMU 13, which is a popular place to hunt moose and caribou in, does not provide for subsistence uses.

**Comments:**

We oppose Proposal 104. We do not harvest antlerless cow moose, especially cow moose with calves. Cows with calves may be incidentally harvested by hunters. It is against our cultural practice to hunt and harvest cows with calves. Cows could be carrying young and could be killed by hunters.

It would be difficult to distinguish an antlerless (bull moose) from an antlerless cow moose during late winter months. Cows with calves may be incidentally killed, two moose would be killed, if this were to happen. Calves cannot survive by themselves.

**Comments:**

We oppose Proposal 105 to eliminating 5 AAC 85.045 Antlerless moose by (DM326) drawing permit only; a person may not take a calf or a cow accompanied by a calf with open season from Oct. 1 – Oct 31 and Mar. 1 – Mar. – 31.

We oppose antlerless moose hunts to begin with. Calves and cows accompanied by a calf or calves should never be hunted or killed. It is against Ahtna customary and traditional way of life to kill a calf or a cow with a calf. Two moose will be killed.

Calves may grow to be adult moose and become productive breeders or mature large Bull Moose. Too many large moose are being killed as it is.

Allowing moose calves to be killed is calf genocide! It is unthinkable that anyone would want to kill a calf or a cow with a calf.

We do not believe that moose will eat its' source of food to extinction. There are plenty of food source for moose to eat. Moose population may decline, but it will never become extinct. Ahtna People believe that moose like every other wild game will recover if population declines, wild game will not out eat its' range of food source.



**Comments:**

We support Proposal 106 to eliminate drawing permit hunt (DM324) in GMU 13. GMU 13 doesn't need to have drawing permit hunts. General Season hunt provides opportunity to harvest a bull moose. GMU 13 has way too many hunters in the field hunting for caribou, moose and bears.

**Comments:**

We oppose Proposal 107 to add a GMU 13 season any bull registration hunt – November 15 – November 30, issuing up to 200 permits.

Another special hunt will only create more hunters in GMU 13. Late season hunt will encourage more hunters to harvest more moose. Ground and conditions would make it easier for hunters to walk or use snow machines on frozen ground.

The Department has closed GMU 13 - December CSH moose hunt because moose hunt was uncontrollable. Additionally, moose are more vulnerable during November month, there isn't much snow on the ground, moose will over harvested.

**Comments:**

We support Proposal 108 with an amendment to include only community subsistence hunt - CM300 to be changed to one any bull moose with spike-fork or 50-inch or antlers with 3 brow tine.

Large Bull Moose shouldn't be killed, large Bull Moose gene pool will dis-appear as more mature Bull Moose are killed every years. Large bulls are also high in the hills during early part of hunting season and are difficult to kill.

Three brow tine bull moose seem to be more abundant than 4 brow tine bull moose. Three brow tines would be easier to hunt and harvest.

**Comments:**

We support Proposal 109 to change subunit 13D DS160 and DS 260 to full-curl ram. Any rams are easier to hunt and harvest. Smaller antler rams should be conserved so they can grow up to be mature rams. Ram population may be stable, however, it is good to conserve resources.

**Comments:**

We are neutral on Proposal 110.

**Comments:**

We support Proposal 111 to Open a fall season for hunting brown bear and black bear over bait in Unit 13 from April 15 to June 30 and from August 20 to October 15 except that portion of Unit 13E that is Denali State Park. Hunting brown bear over bait from August 20 to October 15 will be by registration permit only. This hunt may be closed by emergency order if a harvest goal is met.

Black and brown bears populations are stable in GMU 13. A fall season for hunting brown and black bear over bait will reduce bears in Unit 13. Calves of moose and caribou are eaten by black bears and brown bears. There has been many sightings of black bears in villages. Baiting bears will keep communities safe.

**Comments:**

We support Proposal 112 to lengthen hunting season for brown bear in Unit 11 from August 10 to June 30. Too many brown bears kill caribou calves in GMU 11. Mentasta Caribou Herd has a population of about 300, which is way too low. Lengthening brown bear hunting season will help to increase caribou.

**Comments:**

We support Proposal 113 to lengthen trapping season in GMU 13 for wolverine to February 28. Trappers will have more opportunity to get a wolverine, supplement income, make clothing out of wolverine fur and won't be penalized for catching illegal furbearer in traps.

**Comments:**

See comments under Proposal 113.

**Comments:**

See comments under Proposal 113.

**Comments:**

We support Proposal 116 to allow trappers who incidentally takes a furbearer during a closed season in a trap that is set for a furbearer species that is still open, the Department of Fish and Game may issue a total of two (2) incidental take tags per licensed trapper per year only for species that have a "no limit" bag limit.

Trappers will have to give furbearers to ADFG if they incidentally trap a furbearer that has an early closed trapping season. Trapping seasons for furbearers should be uniform so that trappers will not catch illegal furbearers, give furs to ADFG, and possibly get a fine as well.

**Comments:**

We support Proposal 117 to reduce the harvest and possession limits for grouse in Unit 11 from 15 to 5 per day, and 10 from 30 in possession of which not more than 2 per day and 4 in possession may be Ruffed grouse.

Non-local hunters are travelling out from urban areas and killing huge amounts flocks of grouse in Unit 11 along Nabesna and McCarthy Roads. Flocks of grouse are being killed at one time, individuals then move on to find more flocks of grouse and kill them, too. Alaska Department of Fish and Game Wildlife Biologist does not have a conservation concern with 30 individuals catching their limit. It is a concern that people are over-harvesting Spruce and Ruffed Grouse.

**Comments:**

See comments under Proposal 117.

**Comments:**



We oppose Proposal 119 to lengthen hunting season for ptarmigan in Unit 13B. Too many hunters will kill ptarmigan in Unit 13B. Hunters from Anchorage will travel to hunt ptarmigan. Board should keep hunting season as it is – August 10 to November 30. Ptarmigan population should be protected from hunters who travel to this region just to shoot wild game birds for social events.

**Comments:**

See comments under Proposal 119.

**Comments:**

See comments under Proposal 119.

**Comments:**

We support Proposal 122 to modify the Sourdough Controlled Use area to include Gulkana River, Sourdough Creek Campground or boat launch so that hunters can enjoy hunting without other hunters using motorized off road vehicles in these areas. People that do not have off-road-vehicles need to have areas where have a chance to hunt and harvest wild game.

**Comments:**

We support Proposal 123 to modify Clearwater Creek to include the Maclaren Summit trail. Maclaren Summit trail is within the Maclaren River drainage. Motorized vehicles should not be used in these areas, so that hunters can walk and hunt to harvest wild game in these areas.

**Comments:**

We oppose Proposal 124 to eliminate GMU 13 – specific proxy requirements. Proxy hunting regulation was changed due to excess abuse of proxy hunting for numerous beneficiaries. Changing this regulation will allow abuse to occur again. There are more hunters in the field, a few will abuse the proxy system.

**Comments:**

See comments under Proposal 104.

**Comments:**

We support Proposal 162 to reauthorize resident brown bear tag fee exemption throughout Interior Region and Eastern Arctic Alaska. Hunters will be more inclined to harvest brown bears, if they do not have to pay for tags. More brown bears should be harvested, there are too many brown bears.

## **Additional Proposal (1)**

**Comments:**

We oppose Proposal 164 to allow Alaska residents 60 years and older the use of crossbow in archery hunts. We do not support specialized hunts, as they create another specialized hunting season and bag limits. Game Management Unit 13 should not be allowed more specialized hunting seasons. Way too many hunters in GMU 13, crowded conditions create unsafe hunting in the field.