

## Alaska Migratory Bird RC 033 Co-Management Council Native Caucus

U.S. Fish & Wildlife Service

Alaska Department of Fish & Game

Aleutian-Pribilof Islands Association

Association of Village Council Presidents

Bristol Bay Native Association

Chugach Regional Resources Commission

Copper River Native Association

Kawerak, Inc.

Maniilaq Association

North Slope Borough

Sun'aq Tribe of Kodiak

Tanana Chiefs Conference November 10, 2017

Mr. Ted Spraker, Chairman Alaska Board of Game Alaska Department of Fish & Game PO Box 115526 Juneau, Alaska 99811-5526

RE: Proposal 41 –Exempt Rural Subsistence Hunters from the Requirements for

Obtaining an Alaska Waterfowl Conservation Tag (State Duck Stamp)

Dear Mr. Chairman and Members of the Board of Game:

On behalf of the Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC), I would like to thank the Board of Game for this opportunity to provide comments on Proposal 41.

First, I would like to point out to the Board of Game an error in the proposal, and clarify any uncertainty this error may have added to the original intent of the proposal. Paragraph 1 of the proposal reads: "The Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC) would like the Alaska Board of Game to consider establishing an exemption from the regulation requiring all hunters under the age of 18 to purchase an Alaska Waterfowl Conservation Tag (State Duck Stamp)". As written, the intent of the proposal could be misconstrued as requesting the Board to consider exempting hunters that, by statute, are already exempt from purchasing a state duck stamp. AS 16.05.340(a)(17)(A) states that a person may not engage in waterfowl hunting without having the current year's waterfowl tag...unless that person...(ii) is a resident under 18 years of age. The intent of the proposal was not to ask that the Board consider an exemption for hunters that are already exempt under state statute.

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A Co-Management partnership among Alaska Natives, U.S. Fish & Wildlife Service, and State of Alaska in support of the subsistence use and conservation of migratory birds To clarify, Paragraph 1 of the proposal was intended to be written as: The Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC) would like the Board to consider establishing an exemption from the regulation requiring all hunters "18 years of age or older" to purchase an Alaska Waterfowl Conservation Tag (State Duck Stamp). This change would better reflect the intent of the proposal which was to ask the Board to consider eliminating the requirement that non-exempt subsistence hunters purchase a state duck stamp in order to participate in the federal spring-summer subsistence harvest of migratory birds. The Native Caucus respectfully asks that the Board consider this minor change to the language of Proposal 41, which clarifies the original intent of the proposal, during their deliberations on the proposal.

Thank you in advance for your consideration of our request. If you have any questions, please feel free to contact me.

Sincerely,

Patricia K. Schwalenberg, Executive Director Alaska Migratory Bird Co-Management Council