



unapologetically **FOR ALASKAN RESIDENTS**

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Comments on Board of Game

Draft Nonresident Allocation Policy (RC 25)

Statewide Meeting November 10-17, 2017

Dear Board Members,

November 15, 2017

First off, we'd like to thank the Board for examining our Statewide Proposal #28 that was non-regulatory in nature, and taking this matter up at the work session to discuss under miscellaneous business at the statewide meeting. And for taking the time to draft a new nonresident allocation policy for review.

We do have several concerns about the new draft policy. There may be no need for such a long preamble, and the actual allocation policy isn't defined until Page 6. So we'll concentrate on the section where the board addresses its allocation policy:

- 1) In times of stability, abundance, or rapid growth – it is the board's policy to allow maximum opportunity for all hunters, with the bounds of sustained yield management practices, regardless of residency.*

There needs to be consistency in any nonresident allocation policy. According to the above, the board would be opening the Nelchina caribou herd to nonresident hunting right now. It's over-abundant, we're trying to reduce the population, yet the board is not providing maximum opportunity to all regardless of residency. Why is the Nelchina herd different than the Fortymile herd? What makes it different? Both are along the road system and both have a positive C&T finding.

- 2) In times of non-hunting-related population decline - it will be the board's policy to restrict all non-subsistence hunting only if it is predicted to slow the decline or have the potential to speed the recovery of these populations appreciably. Generally, non-resident hunters will be restricted first in these circumstances, unless their portion of the overall harvest is deemed insignificant.*

In 2016 the Board restricted hunting opportunities for the Central Arctic Herd (CAH) for both residents and nonresidents due to a severe population decline. Hunting was nearly closed for all non-federally qualified users. Yet

after restricting both residents and nonresidents the board allocated 42% of the projected harvest to nonresidents.

The CAH is the last general season caribou hunt along the road system, and many Alaskans depend on the CAH to fill their freezers. Whenever we have population declines and residents are restricted, nonresident allocations should not ever allow for over 10% of the harvest of any moose, caribou or deer population.

- 3) *In times of hunting-related population decline – it will be the board's policy to identify the potential causes and address each case individually. Non-resident hunters will be restricted first in these circumstances, unless their portion of the overall harvest is deemed insignificant or the restriction of non-resident hunters does not address the primary cause of decline.*

How would the board define "insignificant"? In times of hunting-related population declines, no nonresident harvest is insignificant, not 2%, not 1%. #3 above alludes hunting contributed to a population decline, so how can any restriction of nonresident hunters not address a primary cause of the decline?

- 4) *The board may choose to address areas of hunter overcrowding or conflict issues by placing limitations on or between commercial service-dependent hunts, or request that the appropriate regulatory body address the service provider issue if it is beyond the board's authority. This may be accomplished by guided-only or non-guided-only permit stipulations for any species, as the board has done in several places in the past. Sustained yield will be the first test in these circumstances, then subsistence obligations, historical use patterns, and quality of hunt experience will be considered.*

This opens the door wide for yet more must-be-guided permit hunts for species the legislature never intended to fall under the must-be-guided law. It also isn't fair to nonresidents who are fully capable of hunting moose or caribou on their own and can't afford, or don't want to hire a guide. If overcrowding or conflicts are an issue, the first response should be to limit the nonresident component. There is no need to create new must-be-guided hunts in order to limit the nonresident component. The board should have a policy that they will not create any more must-be-guided hunts for species that don't fall under AS 16.05.407.

6) *The board has supported the reestablishment of state-managed guide concessions to address user conflicts and hunt quality issues for more than a decade. The board continues to support this avenue to address known conflict areas, and will continue to do so. It will be the board's policy to address non-resident allocations under state or federal concessions that have overlaying draw requirements in a manner that cooperates with land management efforts and goals, as deemed appropriate by the board.*

The board has done nothing over a decade to address the user conflict and hunt quality issues raised above other than support the proposed DNR Guide Concession Program (GCP). The board should stipulate that it does not support the proposed DNR Guide Concession Program without a full public process and legislative approval. Beyond that, the board should address the known problems without waiting further for the GCP to come into existence.

Regarding the lengthy preamble, there are numerous factual errors.

In Section 2, RHAK wishes the state really did maintain authority for wildlife management on federal lands. The truth is our wildlife resources on federal lands in Alaska are not managed to benefit all US citizens equally. And managing by zip code certainly doesn't benefit all Alaskans equally.

In Section 6, in the first bullet point, no one and no organization we know of, ever proposed to eliminate nonresident sheep hunting. Regarding the Dall Sheep Working Group, the draft says: *"...convened a Dall sheep working group made up of Alaskan residents to discuss the known data, survey results, and issues more broadly in an open setting. At the end of this process, the board found the majority of the Alaskan public did not support eliminating non-resident hunting opportunity. While there was some support for limiting non-resident opportunity, in regard to sheep hunting specifically, the support was not wide spread or persuasive in terms of a conservation or management need at this time. Further, many opposed change in pointing out that human-caused mortality has not been a driving factor in cases of sheep declines."*

This is a complete revision of actual events and votes undertaken by the Dall Sheep Working Group (WG). Again, never did it come up in the WG to eliminate nonresident sheep hunters. Not even the Alaska Wildlife Alliance representative on the WG wanted to eliminate nonresident sheep hunters. Furthermore, a whopping 83% of the WG – made up of 25% guides – voted to limit nonresident sheep hunters. That is not *"some support"* as the draft

says, that is overwhelming support. The truth is, many did support change, while some on the WG did not.

The Dall Sheep working group was set up from the beginning to fail, because it mandated a 100% consensus among a very diverse group, many of whom had economic incentive to not support change, before any recommendations to the Board of Game could be made. There was no "*end to the process*," the WG was disbanded because everyone realized there was absolutely no chance to achieve 100% consensus among the group.

We won't belabor the preamble in toto. Again, thank you for taking the time to reconsider your nonresident allocation policy finding.

We hope you will take under advice our recommendations for a consistent statewide nonresident allocation policy.

Before residents are restricted, nonresidents need to be limited. When residents are restricted, the nonresident allocation should always take the major brunt of those restrictions and/or limits. Under severe conditions, such as population declines that lead to Intensive Management Predation Control efforts, nonresident hunting should be eliminated until that population rebounds to the point residents have already been allowed more opportunity to fill their freezers. Never should nonresidents contribute, even "insignificantly," to certain hunts going over quota to where subsistence hunts are then canceled.

Sincerely,

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