



unapologetically **FOR ALASKAN RESIDENTS**

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June 21, 2023

To: Federal Subsistence Board

Re: 2024-2026 Wildlife Proposals

Dear Chair Jacobson and members of the Federal Subsistence Board,

Below are comments from Resident Hunters of Alaska (RHAK) on Wildlife Proposals before the board for the 2024-2026 regulatory years.

Wildlife Proposal 24-03 – close a portion of Unit 1C, remainder (RG015 permit area) to goat hunting by non-Federally qualified users from Aug 1 – 31.

OPPOSE

*(Board members please note that Unit 1C Remainder is the RG 013 permit area, **not** the RG 015 permit area described in the proposal. Unit 1C Remainder under the RG 013 permit already had season dates for goat Aug 1 – Nov 30.*

We believe the proponent of this proposal means the RG 015 permit area in Unit 1C, drainages of the Chilkat Range south of the south bank of the Endicott River.)

As the proponent of WP 24-03 correctly states, the Board of Game at their Southeast meeting in 2023 passed proposal 31 from Resident Hunters of Alaska that expanded the Unit 1C goat registration hunt RG 015 permit season to Aug 1 – Nov. 30. This change aligns the season dates on the north end of the Chilkat Range with the southern end. In no way does this expanded RG 015 season take away from subsistence goat hunting opportunities or prevent subsistence hunters from harvesting a goat.

A “preference” to federally qualified users does not mean there needs to be an absence of NFQU opportunities, which the proponent of this proposal advocates. Competition alone is not a valid reason to restrict NFQU.

Alaska Department of Fish & Game data shows that over the past five years there has been an average harvest of 3 -9 goats on the entire Chilkat Peninsula, with few nannies being taken. Goats on the Chilkat Peninsula have increased from the lows of the past and current harvest quotas are not being reached. There is no reason to restrict NFQU during Aug 1 – 31.

Wildlife Proposals 24-28 and 24-29 – reduce the caribou harvest limit in Unit 23, or across the entire Western Arctic Caribou Herd’s range, to 4 caribou per year, only one of which may be a cow

SUPPORT

Recent declines in the Western Arctic Caribou Herd (WACH) have caused a temporary hunting closure on federal lands to non-federally qualified users. However, biologists don’t believe the small percentage of the harvest going to non-local caribou hunters contributed to the declines, or that the temporary closure to non-locals will contribute to the growth of the WACH.

One thing RHAK has consistently addressed is the high bag limit (5 caribou per day) and the allowance to take cows during these declines, and how the taking of cows especially contributes to the declines and ability for the herd to rebound. We have also addressed the need for compliance with the RC 907 permit requirements that all federally qualified subsistence hunters are required to adhere to. Not knowing what the harvest is by local hunters, and how many cows are being taken, prevents this board and biologists from really knowing the facts in order to make a fully informed decision.

We fully support Wildlife Proposal 24-28 to reduce the caribou harvest on federal lands across the WACH’s range to 4 caribou per year, only one of which may be a cow, and Wildlife Proposal 24-29 to do the same for Unit 23 only.

Wildlife Proposals 24-30 & 24-31 – close caribou hunting on federal lands in Unit 23 to NFQU from Aug 1 – Oct 31

OPPOSE

RHAK supported the last *temporary* caribou hunting closure for non-federally qualified users (NFQU) in Unit 23 during Aug 1 – Oct 31 based on our long-held agreement with the Western Arctic Caribou Herd Working Group Plan that called for restrictions if and when the herd dropped below 200,000 animals.

However, we never believed that the restrictions should be applied to only non-local hunters or that the small percentage of non-local caribou harvest contributed to subsistence needs not being met or the WACH’s decline or ability to regrow. **We strongly oppose making this closure permanent.**

We have always stated that we believe the high bag limit of five caribou per day, and especially the allowance to take cows, was the primary factor contributing to the herds decline and ability to rebound, as well as the fact that no one really knows what the actual local harvests are or if subsistence needs are being impacted because of lack of compliance with the RC 907 permit reporting requirements. We simply cannot have prudent wildlife management, or make informed decisions, without knowing how many caribou are being harvested and by whom.

Wildlife Proposals 24-28 and 24-29 (which we support!) seek to lower the caribou bag limit and allowance to take so many cows for all users on federal lands within the WACH's range and should either of those pass we believe they will help protect cows, allow the herd to begin to rebound, and make a permanent caribou hunting closure to NFQU unnecessary.

As the herd increases, these temporary caribou hunting closures to NFQU should be rescinded.

Wildlife Proposal WP 24-26 – extend the temporary Dall sheep hunting closure for all users on federal lands in Unit 24B and 26B west of the Sagavanirktok River through the 2024-2026 cycle

OPPOSE

We respectfully request that the board defer this proposal, as the Board of Game will be meeting in March 2024 to deliberate on proposals that if passed will address sheep conservation concerns in the central Brooks Range and imposing limits on nonresident sheep hunters.

As stated in our previous comments, RHAK is very concerned about sheep declines across the state, especially state regulations that allow unlimited nonresident sheep hunting, which requires hiring of a guide. There are proposals before the Board of Game seeking to limit or restrict nonresident sheep hunters in Units 24B and 26B who account for over 40% of the harvest of sheep in these areas.

The FSB does not have the authority to limit only nonresident non-local sheep hunters, and we do not believe resident sheep hunters need to be restricted in these units. These areas are one of the only road-accessible areas where resident sheep hunters can access the sheep, and they are primarily restricted to archery-only hunting (with a very low success rate) within the Dalton Highway Corridor Management Area.

Wildlife Proposals 24-04, 24-05, & 24-06 – close portions of federal lands on Admiralty and Chichagof Islands to deer hunting by NFQU from Nov 1 – 15

OPPOSE

These 3 proposals are essentially do-overs of those that were not passed by the board in 2023, and the rationale the board used to deny those deer hunting restrictions to NFQU on portions of the ABC Islands in Unit 4 last year very much still applies to these proposals.

Data from the Alaska Department of Fish & Game debunked claims in proposals heard by the board in 2023 that deer populations in Unit 4 were down. Deer populations in Unit 4 are abundant and healthy and near carrying capacity. And there was absolutely no real evidence by proponents of deer hunting restrictions on NFQU that subsistence needs were not being met,

The same applies to these proposals before the board for the 2024-2026 cycle.

As to evidence of subsistence needs not being met, we again did not see any such evidence in Wildlife Proposals 24-04, 24-05, or 24-06. NFQU are **not** “obstructing access,” nor are they altering deer behavior, as stated in WP 24-04. The one factual statement in WP 24-04 is that NFQU compete with locals for the deer resource. But that does not mean that such competition prevents subsistence needs from being met during the peak of the rut Nov 1 -15, which is when proponents of these proposals want non-local deer hunters restricted.

As mentioned in our RHAK testimony before the board last year, “competition” alone is not a valid reason under ANILCA guidelines to restrict NFQU. We explained that of course every hunter would like it if he or she was the only one in the field, but that is not a valid reason to restrict others. We also mentioned that the opportunity to hunt is never a guarantee that one will be successful. One individual hunter who may not have been as successful as he or she was in the past is not at all an example that subsistence needs are not being met.

We urge the board not to set precedent by passing these proposals that would essentially use “competition” alone as the rationale for restrictions on NFQU. Without concrete evidence that subsistence needs are not being met because non-locals are allowed to hunt during the same period as locals, these proposals should be voted down.

Thank you board members for your attention to our comments.

Sincerely,

Mark Richards

Executive Director Resident Hunters of Alaska

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