

**ALASKA BOARD OF GAME**  
**Policies and Resolutions**

*(\*Bold findings are included in workbook.*

**2007**

**#2007-173-BOG      Nonresident Drawing Permit Allocation Policy – (#162 Revised)**  
**#2007-172-BOG      Annual Reauthorization of Antlerless Moose**

**2006**

**#2006-171-BOG      Resolution supporting a Moratorium on New Zoo Applications**  
**#2006-170-BOG      Unit 13 Caribou and Moose Subsistence Uses**  
**#2006-169-BOG      Unit 19D-East Intensive Management Supplemental Findings**  
**#2006-168-BOG      Unit 19A Intensive Management Supplemental Findings**  
**#2006-167-BOG      Unit 16 Intensive Management Supplemental Findings**  
**#2006-166-BOG      Unit 13 Intensive Management Supplemental Findings**  
**#2006-165-BOG      Unit 12 and 20E Intensive Management Supplemental Findings**  
**#2006-164-BOG      Board of Game Bear Management and Conservation Policy**  
**#2006-163-BOG      Resolution Regarding Declining Fish and Wildlife Enforcement in Alaska**  
**#2006-162-BOG      Nonresident Drawing Permit Allocation Policy**  
**#2006-161-BOG      Finding of Emergency: Predator Control Implementation Plans**

**2005**

**#2005-160-BOG      Finding of Emergency: Methods of Harvest for Hunting Small Game in the Skilak Loop Special Management Area of the Kenai National Wildlife Refuge**  
**#2005-159-BOG      Resolution in Support of Allowing Guides to Take Wolves while Under Contract to Clients**  
**#2005-158-BOG      Resolution in Support of Public Education Program on Predator Control**  
**#2005-157-BOG      Reauthorizing Wolf Control in Portions of Unit 13**  
**#2005-156-BOG      Supporting Joint Federal and State Deer Harvest Reporting**  
**#2005-155-BOG      Supporting Governor's Lawsuit Against Federal Government; Extent and Reach of Subsistence Regulations in State Navigable Waters**

**2004**

**#2004-154-BOG      Supporting Increasing Resident and Non-Resident Hunting License and Tag Fees**  
**#2004-153-BOG      Increase FY06 Budget for Boards of Fisheries and Game and State Advisory Committees**  
**#2004-152-BOG      Predator Control in Portions of Upper Yukon/Tanana Predator Control Area**  
**#2004-151-BOG      Bear Baiting Allocation**  
**#2004-150-BOG      Authorizing Predator Control in Central Kuskokwim Area, Unit 19A**  
**#2004-149-BOG      Signage for Traplines on Public Lands**  
**#2004-148-BOG      Authorizing Predator Control in Western Cook Inlet, Unit 16B**  
**#2004-147-BOG      Bear Conservation and Management Policy**  
**#2004-146-BOG      Americans with Disabilities Act Exemptions**

### **2003**

- #2003-145-BOG Authorization of Airborne Shooting in Unit 19D East Predation Control Program
- #2003-144-BOG Authorizing Wolf Control in Portions of Unit 13
- #2003-143-BOG Authorizing Wolf Control in Portions of Unit 13
- #2003-142-BOG Resolution of the Alaska Board of Game Concerning a Statewide Bear Baiting Ballot Initiative
- #2003-141-BOG Request for Commissioner's Finding Regarding Same-Day-Airborne Wolf Hunting in Game Management Unit 13
- #2003-140-BOG Guidelines for a Unit 19D East Predation Control Program
- #2003-139-BOG A resolution of the Alaska Board of Game Concerning Management of Kenai Peninsula Brown Bear Mortality

### **2002**

- #2002-138-BOG Request to US Forest Service re: Management of Guided Brown Bear Hunting in Unit 4
- #2002-137-BOG Unit 1C Douglas Island Management Area Findings
- #2002-136A-BOG Unit 1D Brown Bear Drawing Hunt Finding
- #2002-136-BOG Government to Government Relations with Tribes in Alaska

### **2001**

- #2001-135-BOG Resolution concerning Unit 19D-East Adaptive Management Team Work

### **2000**

- #2000-134-BOG Unit 4 Brown Bear Management Team Findings
- #2000-133-BOG Habituation of Wildlife (unsigned – left in draft)
- #2000-132-BOG Reaffirm Resolution re: Management of Alaska's Fish and Game Resources/Ballot Initiative Process
- #2000-131-BOG Finding of Emergency: Unit 19D-East (Wolf Control Implementation Plan)
- #2000-130-BOG Resolution re: Support of the Conservation and Reinvestment Act of 1999

### **1999**

- #99-129-BOG Snow Machine Use in the Taking of Caribou

### **1998**

- #98-128-BOG Findings on Elk Management in Region I
- #98-127-BOG Findings on Commercial Guiding Activities in Alaska
- #98-126-BOG Emergency Findings – Moose in Unit 25B and Unit 25D
- #98-125-BOG Emergency Findings – Moose in Unit 21D
- #98-124-BOG Emergency Findings – Moose in Unit 18
- #98-123-BOG Emergency Findings – Caribou in Unit 9
- #98-122-BOG 1998 Intensive Management Findings: Interior Region
- #98-121-BOG Findings: HB 168, Traditional Access
- #98-120-BOG Resolution re: Ballot Initiative Banning Use of Snares

#98-119-BOG  
#98-118-BOG

**Trapping and Snaring of Wolves in Alaska**  
Customary and Traditional Use of Musk Ox in Northwest Unit 23

**1997**

#97-117-BOG  
#97-116-BOG  
#97-115-BOG

**Customary and Traditional Use of Musk Ox on the Seward Peninsula**  
Dall Sheep Management in the Western Brooks Range  
Resolution supporting Co-management of Alaska's Fish and Game Resources

#97-114-BOG  
#97-113-BOG

Resolution re: Dual Management of Alaska's Fish and Game Resources  
**Resolution re: Methods and Means of Harvesting Furbearers and Fur Animals Including Wolves**

#97-112-BOG

Resolution re: Management of Alaska's Fish and Game Resources/Ballot Initiative Process

#97-111-BOG

Finding to Include Unit 22 (except 22C) in the Northwest Alaska Brown Bear Management Area

#97-110-BOG

Finding of Emergency re: Stranded Musk Oxen

#97-109-BOG

Findings re: Unit 16B-South Moose

#97-108-BOG

Resolution re: Subsistence Division Budget

#97-107-BOG

Findings re: Wanton Waste on the Holitna and Hoholitna Rivers

**1996**

#96-106-BOG

Delegation of Authority re: Issuing Permits to Take Game for Public Safety Purposes

#96-105-BOG

Delegation of Authority to Implement Ballot Measure #3

#96-104-BOG

Finding of Emergency re: Western Arctic Caribou Herd

#96-103-BOG

Findings – Antlerless Moose in Unit 20A

#96-102-BOG

Findings – Nelchina Caribou Herd Management

#96-101-BOG

Findings – Intensive Management for GMU 19D East

#96-100-BOG

Establishment of the Nenana Controlled Use Area

#96-99-BOG

Moose Populations in Unit 26A

#96-98-BOG

Taking Big Game for Certain Religious Ceremonies

#96-97-BOG

Forty Mile Caribou Herd Management Plan

#96-96-BOG

Finding of Emergency – Moose in Remainder of Unit 16B

**1995**

#95-95-BOG

Resolution – Wildlife Diversity Initiative

#95-94-BOG

Resolution – Change Name of McNeil River State Game Refuge to Paint River State Game Refuge

#95-93-BOG

Requiring License Purchase in advance

#95-92-BOG

*Open Number*

#95-91-BOG

Delegation of Authority – Comply with Alaska Supreme Court Opinion in Kenaitze vs. State

#95-90-BOG

Board Travel Policy

#95-89-BOG

Findings – Noatak Controlled Use Area

#95-88-BOG

Delegation of Authority to Increase Bag Limits in Unit 18 for Mulchatna and Western Arctic Caribou Herds

#95-87-BOG Subsistence Needs for Moose in Unit 16B  
 #95-86-BOG Findings on Intensive Management in Unit 19D  
 #95-85-BOG Findings on Intensive Management in Unit 20D  
 #95-84-BOG Findings on Intensive Management in Unit 13  
 #95-83-BOG Resolution: Subsistence Use on National Park Lands  
 #95-82-BOG “No Net Loss” Policy for Hunting and Trapping Opportunities  
 #95-81-BOG Resolution: Remove Federal Management of F&W on Public Lands and Waters  
 #95-80-BOG Resolution to Legislature to Define Subsistence

**1994**

#94-80A-BOG Wolf Predation Control Program in Unit 20A  
 #94-79-BOG Delegation to Commissioner to Adopt Regulations Resulting from Kenaitze Decision which Invalidates Nonsubsistence Areas  
 #94-78-BOG Addendum to Findings on Unit 16B Moose  
 #94-77-BOG Resolution on SB325 (Repeal Antlerless Moose Statute)

**1993**

#93-76-BOG Findings on McNeil River Refuge Bears  
 #93-75-BOG Resolution on Adak Caribou  
 #93-74-BOG Delegation of Authority for Permits to Take Furbearers with Game Meat  
 #93-73-BOG Delegation of Authority to Make Emergency Regulations Permanent, Moose in Unit 19D  
 #93-72-BOG Wolf Control Findings – Delta Area  
 #93-71-BOG Resolution on Round Island Walrus Hunt  
 #93-70-BOG Findings on Unit 16B Moose Seasons and Bag Limits  
 #93-69-BOG Resolution on Popof Island Bison  
 #93-68-BOG Resolution on Commercialization of Moose  
 #93-67-BOG Resolution on Elk Transplants in Southeast  
 #93-66-BOG Resolution on Clear-cut Management in the Tongass National Forest

**1992**

#92-65-BOG Findings in Units 12, 20B, D, and E on Wolves  
 #92-64-BOG Findings in Unit 20A Wolves  
 #92-63-BOG Findings in Unit 13 Wolves  
 #92-62-BOG Findings Wolf Area Specific Management Plans for Southcentral and Interior  
 #92-61-BOG Resolution on Unit 13 Moose  
 #92-60-BOG Findings Unit 13 Moose Seasons and Bag Limits  
 #92-59-BOG Findings Unit 19 A&B Moose – Holitna and Hoholitna Controlled Use Area  
 #92-58-BOG Findings on Kilbuck Caribou re Fall Hunt  
 #92-57-BOG Report of the Board of Game, Area Specific Management Plans for Wolves  
 #92-56-BOG Relating to Moose in GMUs 19A and 19B per Superior Court order in Sleetmute vs. State

#92-55-BOG Relating to Endorsement of State Closure of Deer Hunting in GMU 4 and Requesting Federal Closure

**1991**

#91-54-BOG Findings on Strategic Wolf Management Plan  
#91-54a-BOG Relating to Kilbuck Caribou Management Plan  
#91-53-BOG Relating to Taking of Walrus from Round Island by Residents of Togiak  
#91-53a-BOG Board Direction to Committee for Strategic Wolf Plan  
#91-52-BOG Findings on Unit 13 Moose Season and Bag Limits

**1990**

#90-51-BOG Findings on Strategic Wolf Management Plan  
#90-50-BOG Relating to Kilbuck Caribou Management Plan  
#90-49-BOG Findings on Kwethluk Emergency Caribou Hunt Petition  
#90-48-BOG Relating to the Use of Furbearers by Rural Alaskans, Including Alaska Natives  
#90-47-BOG Relating to the Commercialization of Moose and other Wildlife  
#90-46-BOG Relating to Destruction of Moose by the Alaska Railroad

**1989**

#89-45-BG Delegation of Authority to Adopt Waterfowl Regulations

**1988**

#88-44-BG Delegation of Authority for March 1988 Meeting  
#88-43-BG Resolution Supporting Funding for Division of Game

**1987**

#87-42d-BG Procedures for Delegations of Authority (Replacing #75-2-GB)  
#87-42c-BG Delegation of Authority to Correct Technical Errors  
#87-42b-BG Delegation of Authority to Correct Technical Errors Before Filing Regulations  
#87-42a-BG Delegation of Authority to Adopt Emergency Regulations (Replacing #75-3-GB)

**1986**

#86-41-BG Finding of Emergency: New State Subsistence Law  
#86-40-BG Delegation of Authority

**1985**

#85-39-GB Resolution on Resources v/s Logging  
#85-38-GB Findings: Madison vs. State Requirements  
#85-37-GB Lime Village Management Area Findings  
#85-36-GB Findings: Waterfowl hunting in and near Palmer Hayflats

**1984**

#84-35-GB Resolution on Waterfowl Stamp

#84-34-GB Transplant of Musk Ox to Nunivak Island

**1983**

#83-33-GB Resolution on Guide Board  
#83-32-GB Findings on Moose in GMU 16B

**1982**

#82-31-GB Supplement to Wolf Population Control

**1981**

#81-30-GB Findings and Policy Regarding Nelchina Caribou  
#81-29-GB Finding and Policy for Future Management of the Western Arctic Caribou Herd  
#81-28-GB Letter of Intent: Wolf Reduction in Alaska

**1980**

#80-27-GB Letter of Intent Regarding Use of Alaska's Game for Religious Ceremony  
#80-26-GB Findings and Policy Regarding Bowhunting  
#80-25-GB Standing Committee II on Deer  
#80-24-GB Regarding Advisory Committee Coordinators

**1979**

#79-23-GB Authorization to Export Animals from Alaska  
#79-22-GB Staff Directive to Subsistence Section  
#79-21-GB Relating to Brown Bear in GMU 4  
#79-20-GB Relating to Brown Bear in GMU 4  
#79-19-GB Brown Bear, GMU 4  
#79-18-GB Relating to Muskoxen

**1978**

#78-18-GB Statement of Direction: Use of Airplanes in Controlling Predation by Wolves  
#78-17-GB Relating to (d)(2) Legislation, State's ability to Manage Fish & Wildlife Resources  
#78-16-GB Relating to (d)(2) Legislation, State's ability to Manage Fish & Wildlife Resources

**1977**

#77-15-GB Delegation of Authority to Commissioner to Address Petitions  
#77-14-GB Repeal of Regulations Relating to Registration of Camps by Guides for Hunting Bears  
#77-13-GB Regarding Closed Season for Caribou (rescinded November 30, 1977)  
#77-12-GB Regarding the 17(d)(2) Land Settlement

**1976**

#76-11-GB Trapping Wolves by ADF&G

#76-10-GB Request for Public Safety Involvement in Enforcement of Caribou Regulations  
#76-9-GB Management Goal: Western Arctic Caribou  
#76-8-GB Export of Live Game Animals Outside of Alaska  
#76-7-GB Muskox to Anchorage Children's Zoo (rescinded November 30, 1977)  
#76-6-GB Taking of Wolves by Helicopter  
#76-5-GB Regarding the Taking of Wolves in Units 23 and 26A

**1975**

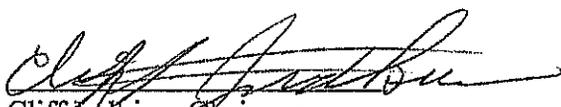
#75-4-GB Endorsement of Trapping as a Legitimate Use of Renewable Resources  
#75-3-GB Delegation of Authority to Adopt Emergency Regulations (See #87-42a-GB)  
#75-2-GB Procedures for Delegations of Authority (See #87-42d-GB)  
#75-1-GB Effectuating Delegation of Authority

Finding for the Alaska Board of Game  
2007-173-BOG

Nonresident Drawing Permit Allocation Policy  
March 12, 2007

At the March 2007, Southcentral/Southwest Region meeting in Anchorage, the Board of Game modified the Nonresident Drawing Permit Allocation Policy, #2006-162-BOG, by adding item #4 to the guidelines that shall be applied when determining the allocation percentage for drawing permits to nonresidents:

1. Allocations will be determined on a case by case basis and will be based upon the historical data of nonresident and resident permit allocation over the past ten years.
2. Each client shall provide proof of having a signed guide-client agreement when applying for permits.
3. Contracting guides shall be registered in the area prior to the drawing.
4. When a guide signs a guide-client agreement, the guide is providing guiding services and therefore must be registered for the use area at that time.

  
Cliff Judkins, Chairman  
Alaska Board of Game

Vote: 7-0  
Amended: March 12, 2007  
Anchorage, Alaska

**Alaska Board of Game  
Policy for the  
Annual Reauthorization of Antlerless Moose**

**#2007-172-BOG**

**Background**

Alaska Statute AS 16.05.780 requires the Board of Game to reauthorize the Antlerless moose seasons in each Game Management Unit, subunit or any other authorized antlerless moose season on a yearly basis.

In order for the Board to comply with AS 16.05.780, it must consider that antlerless moose seasons require approval by a majority of the active advisory committees located in, or the majority of whose members reside in, the affected unit or subunit. For the purpose of this section, an "active advisory committee" is a committee that holds a meeting and acts on the proposal.

Because of the requirement for yearly reauthorization, the Board of Game approves of the proposals in order to insure they remain in regulation. In the case of the antlerless moose seasons, the Board of Game has delegated authority to the Department which allows them to administer a hunt if there is an allowable harvest of antlerless moose. The Board of Game has provided language to allow the Department to issue an "up to" number of permits so that we do not have to try and set a hard number each year. In most years it would be very difficult for a decision on allowable harvest to be made prior to the surveys the Department makes of the moose population.

This requirement for yearly authorization takes a lot of valuable Board time as well as requiring the Department to bring in area biologists or regional supervisors to present to the Board information on the proposed regulation. The attendance of many of these area biologists or regional supervisors is not required for any other proposed regulatory changes that the Board will consider in the normal Board cycle of proposals.

Because this requirement increases the cost to the Department and the Board, and because the annual reauthorization for some of the antlerless moose seasons may be considered a house keeping requirement in order to comply with AS 16.05.780, the Board has determined that a more efficient way to handle the annual reauthorization should be adopted and has established the following policy in agreement with the Department.

**Policy for yearly authorization of Antlerless Moose Hunts by the Board of Game**

Each year, the Department will present as a package for approval all of the antlerless moose proposals. During that presentation, if there are any changes that will be required to be considered, they will be noted for later discussion.

Because the Board had delegated the authority to the Department to hold antlerless moose hunts, there are many hunts that do not occur based on biology. The Department and the Board finds that it is important to keep these regulations on the books so that when opportunity exists, the Department will have the ability to provide additional opportunity for the use of antlerless moose.

The Board agrees that it will minimize debate during the presentation and only consider extensive discussion on any reauthorization that will be associated with a pending proposal submitted during the normal cycle to be considered. This discussion will be limited to any proposal submitted to the Board and not during the approval fo the packaged proposals for reauthorization of antlerless moose seasons.

The Board is aware of the time and expense required to comply with AS 16.05.780; it feels that by adopting this policy both the Department and Board will be better served.



Cliff Jenkins, Chairman  
Alaska Board of Game

Vote: 7-0  
March 12, 2007  
Anchorage, Alaska

**Findings for the Alaska Board of Game  
2006-170-BOG**

**Game Management Unit 13  
Caribou and Moose Subsistence Uses**

**Background**

Virtually since its inception, the Tier II subsistence permit system has been plagued with public complaints about inequities, unfairness, and false applications. Over the years, the Alaska Board of Game (Board) has amended its regulations numerous times to try to address management and legal problems, but the controversy continues and the system remains rife with problems. Public complaints have been primarily directed at the Tier II permitting system—particularly those near urban areas like the Minto moose hunt and the Nelchina Tier II caribou hunt.

The Board has primarily focused on the Nelchina basin caribou and moose hunts because these have generated the vast majority of the interest and complaints from the general public. In addition, Board members are concerned the hunting patterns no longer meet the Board's intent when these subsistence hunts were originally established in regulation. A review of these hunts question whether the current hunts are consistent with the Board's customary and traditional use findings based on the eight criteria the Joint Boards of Fish and Game established (5 AAC 99.010) for implementing the state subsistence law (AS 16.05.258(a)).

Statistics associated with the Nelchina caribou hunt illustrate some troubling trends. Permits have been slowly shifting away from local Alaskan residents the Board identified as the most dependent on the wildlife resources in the region and towards less subsistence dependent urban residents. Testimony from some local residents of Unit 13 indicated they no longer participated in the state subsistence program. The present Tier II scoring and permit allocation system has made it more difficult for long-time, resource-dependent residents of the area to compete for permits, forcing them to rely more heavily on the federal system to provide for subsistence opportunities. The system also makes it almost impossible for area newcomers and younger Alaskans to ever qualify for the limited permits despite their subsistence dependence on wildlife resources for food. In addition, many of the traditions associated with a subsistence way of life are being sidestepped and avoided, such as the traditional teaching of the art of hunting, fishing and trapping to younger generations; and the processing, utilization, and other long-term social and cultural relationships to the resources being harvested and to the land that produces those resources.

The Board's long-term goal is to design a system to accommodate subsistence-dependent users in such a manner that permits can be virtually guaranteed from year to year. The reliability of available hunting opportunities is critical to the maintenance of the subsistence way of life. This could be similar and complementary to the federal subsistence permit system. The federal program allows any Alaska resident living in the Copper Basin and several communities outside

of GMU 13 to harvest two caribou and one moose per year, there is no limit per household except in Unit 13(E) for moose, harvest of caribou by gender is also generally unrestricted in units 13(A) and 13(B), and moose hunters may only take any antlered bull under the federal system.

Bag limits may not be accumulated across both state and federal systems, so hunters can take a total of only one moose and two caribou for the year. State regulations allow all Alaskan residents to harvest a bull moose with spike-fork or 50-inch antlers or antlers with 4 brow tines on at least one side from September 1 – 20. In addition, up to 150 Tier II permits are issued for any bull moose, August 15 – 31, with only one permit being allowed per household. The moose seasons for federally qualified users on federally-managed lands are much longer from August 1 – September 20.

Under the state system, all caribou permits are issued under Tier II regulations and were limited to 3 per household. The Board recently changed the limit to 2 per household. The bag limit is one caribou, although in recent years, harvest under state regulation has been limited to bulls only. The caribou season for federally qualified users on federal land is 10 days longer in the fall, ending September 30 rather than September 20.

State regulations do not jeopardize a qualified federal subsistence hunter from hunting under a federal permit. However, if there are too many state applicants, controlling statutes mandate that permits be issued under the Tier II criteria, with all of its attendant problems.

The Board intends to explore subsistence hunt provisions that reflect and accommodate the customary and traditional use patterns of Nelchina caribou and moose in Game Management Unit (GMU) 13, while distinguishing those uses from other uses.

In accordance with the Joint Boards of Fisheries and Game eight criteria for implementing the state subsistence law, the following findings are made:

### **Findings**

When the Board originally determined there were customary and traditional uses of the Nelchina Caribou Herd and moose in GMU 13, it recognized these subsistence uses were established by Ahtna Athabascan communities within the Copper River basin, and were later adopted by other Alaska residents. Due to the importance of, and high level of competition for subsistence permits in this area, the Board has undertaken, as precisely as possible, the task to identify the particular characteristics of these customary and traditional use patterns. Although they have changed over time due to limited access associated with demographic, economic, and technological factors, the patterns are characterized by traditional fall and winter hunting seasons, efficient methods and means, thorough use of most of the harvested animal, harvest areas traditionally associated with local communities, traditions about harvesting and uses that are passed between generations orally and through practice, and reliance on other subsistence resources from within these same traditional harvest areas

**Criterion 1. A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.**

This criterion presupposes that an identifiable, consistent "pattern" of noncommercial taking, use, and reliance is characteristic of subsistence use. The Board finds, even though there are many similarities among all users of the moose and caribou resources in the area, there continue to be identifiable distinctions, constituting a unique pattern of subsistence use, that is traceable in direct line back to the original Ahtna Athabascan and later non-native customary and traditional use.

The Board has concluded that the pattern of moose and caribou subsistence use for this region was originally defined by the Ahtna Athabascan residents and then adopted and modified by other local settlers in the early 20<sup>th</sup> century. This pattern of use was established over many generations and focused on the total aggregate of fish, wildlife, and plant resources locally available to the area residents.

The greatest dependency on subsistence resources occurred prior to the completion of the existing road system in the 1940s. After about 1950, historical use patterns changed rapidly, especially with the introduction of more mechanized access methods. The mobility of the subsistence and non-subsistence users, the availability of seasonal and part-time employment, increased human populations, increasing competition for wildlife resources, and fluctuating game populations (particularly moose and caribou) caused major shifts in subsistence dependency of people within and adjacent to the region. Nevertheless, aspects of the traditional Ahtna Athabascan use pattern are present today, but subsistence-dependent families engaged in that pattern now account for a smaller percentage of all users than a half-century ago.

Most of the long-term subsistence patterns in this area are community-based. The area's communities tend to be long-established, by Alaskan standards, and the residents of these communities tend to be long-term residents, descending from multi-generational families with long ties to the area. These communities tend to exhibit a use of local resources that stretches back to well before Euroamerican contact. In contrast, the use pattern based out of nearby urban areas tends to involve much more recently established communities, a high degree of turnover among residents, short-term residency and, generally, a relatively brief history of use.

**Criterion 2. A pattern of taking or use recurring in specific seasons of each year.**

Local communities established a tradition of hunting caribou, moose, and other big game species in the late summer and early fall following subsistence fishing, and again hunting in the winter as fresh meat was needed and game was available. Winter hunts have always been critical to subsistence users, as very few other subsistence resources are available during this time. This need for, and use of, winter hunting opportunities is different from use patterns developed by residents of Alaska's more developed and urban areas, where almost all big game hunting takes place exclusively in the fall and is controlled largely by regulations. Thus, as late as 1984, over 60% of the caribou harvest taken by local residents was taken during the winter. Recent changes in that pattern can be largely attributed to regulatory changes, competition from non-local

hunters and shifting migratory patterns of the caribou herd. The seasonal use pattern was based on the traditional Ahtna seasonal movements and the general availability of game. For example, the fall hunt traditionally followed the salmon harvest, whereas the winter hunt took place whenever meat was needed and game was available.

**Criterion 3. A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.**

Before the mid-20<sup>th</sup> century, Ahtna Athabascan hunters tended to rely on boat access along the area's major waterways in fall, on foot along established trails, and by dog team along winter trails after freeze-up. With the opening up of the Nelchina basin to highway access, and the introduction of off-road vehicles, snowmachines, four-wheelers, and other transportation innovations, a shift in the use pattern occurred. Now, local residents tend to utilize roads as hunting corridors in place of rivers in the fall, and use snowmachines to access the backcountry in winter. Recently, expensive off-road vehicles have been purchased and used by many non-local users and a few more affluent local residents in an attempt to compete with non-local hunters and to increase their opportunity for success. The use of all terrain vehicles may create their own hunting efficiencies as hunting effort and transportation take advantage of labor-saving devices. Hunting methods have changed over the last 75 years. Automobiles, snowmachines, and less expensive all terrain vehicles may make hunting more effective because local and non-local residents can now cover larger areas when hunting caribou or moose. Local hunters can, when animals are available, make relatively short trips that fit into a contemporary work schedule. On the other hand, the use of highway, off-road, and similar vehicles has promoted more frequent short trips with considerable transportation costs for depreciation, fuel, and maintenance. What are being lost are the multi-resource harvest efficiencies associated with long subsistence-oriented summer and fall camping trips traditionally engaged in by Ahtna communities. Thus, recent transportation improvements and fuel prices may have changed traditional subsistence activities to the point where it is unlikely that there is a positive cost/benefit (from an economic standpoint) associated with some of the hunting techniques, especially in cases involving the use of expensive recreational motor vehicles. Overall, the use of some motorized vehicles such as ATVs has blurred the distinction between true customary and traditional patterns and recreational activities.

Residents of local communities—those with the longest histories of use of moose and caribou in the region—have traditionally traveled shorter distances to hunt than do non-local participants; and generally utilize less technology in doing so. Most Ahtna elders testified they still prefer to walk in to hunting areas and maintain permanent camps, whenever possible, in accordance with longstanding means and methods. On the other hand, most non-local users must travel at least 125 miles just to get to the area and have tended to be reliant on all-terrain vehicles (ATVs), aircraft and other expensive off-road and recreational vehicles.

As late as 1984, Copper Basin residents utilized only highway vehicles for hunting access over 65% of the time. It is the Board's conclusion that many of these newer technologies have been adopted based on a perceived need to compete with technologically-oriented recreational hunters from Alaska's urban areas. This may be a direct effect of the 1984 regulations.

Historically, much of the taking of caribou, moose, and small game was done as part of a seasonal round of subsistence activities throughout defined areas used by the community. Family dependence on these resources required a commitment of considerable time and effort to accumulate adequate subsistence resources to meet annual protein requirements and other customary and traditional uses.

Another example of subsistence efficiency in the customary and traditional use pattern has been that specialized hunters tend to provide for the community at large, sometimes or often taking more than necessary for their own family's use in their capacities as community providers, and to fulfill social and cultural obligations. Community subsistence activities are then divided among members and further introduced into traditional patterns of barter and exchange. Thus, some harvest and others process, distribute, receive and utilize the results of the harvest. Each member of the community has a defined role and specialty.

A third example of subsistence efficiency, historically, has been the effort to keep hunting as close to home as reasonably possible, minimizing cost and effort necessary to obtain the wild food resources needed by families and communities. The Board believes that, if competition among users can be reduced, this efficiency is likely to be easier for subsistence users to realize.

In these community efforts, special emphasis has been placed on allowing the maximum opportunity to harvest as many animals and the widest variety of useable species as efficiently as possible. Emphasis was also placed on food gathering activities and other traditions associated with Ahtna Athabascan communities.

**Criterion 4. The area in which the noncommercial long-term, and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.**

The Board is examining the area where the subsistence hunting of big and small game occurred prior to the significant change in uses and activities that occurred after approximately 1950 in Game Management Unit 13.

Subsistence uses involve an intimate and exclusive relationship between the user and a very particular set of places generally in close proximity to the hunter's residence. The user is tied to the land. Other types of uses do not exhibit these close, long-term, multi-generational ties to a particularly locality. Even as late as 1981, hunters from Copper Basin communities did not report traveling out of the basin to hunt, while urban-based hunters named alternative areas if they could not hunt Nelchina caribou and moose. Testimony from Ahtna elders emphasized their reliance on local fish and game, and their reluctance, for practical and cultural reasons, to travel outside of their traditional areas for subsistence purposes. Likewise, they described the longstanding family and community use histories and patterns for such areas. Consistently, lifelong residents of the local areas did not share the attitude of utilizing other areas. When Nelchina caribou were not available to them they either added emphasis on moose, and/or use of the Mentasta caribou herd. Resident lake fish species and small game were other alternatives commonly mentioned as alternative and supplemental wild food resources. Families in the range of the Nelchina caribou who harvested little or no wild game mentioned receiving donated meat as an alternative. This differs markedly from the use patterns found in Alaska's urban areas,

where traveling to, and exploring, new game country is deemed a virtue and an essential part of many outdoor experiences.

The Ahtna pattern exhibits a familiarity with terrain and landscape including the associated history of the region transmitted through oral traditions and Ahtna geographic placenames.

**Criterion 5. A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.**

The traditional pattern has been to salvage and use all parts of the harvested animal, in conformance with traditions prohibiting waste. Lifelong residents of the Copper Basin testified they still practice their traditional methods of harvest by retrieving the entire carcass and all bones, hide, head, heart, liver, kidneys, stomach, and fat. Only the antlers were often left behind. This also differs from patterns based out of urban areas, where hunters tend to focus on the meat and antlers, usually leaving most organs, bones, and the hide in the field.

Ahtna elders also emphasized that preparation and storage are viewed as essential components of their overall use. Women traditionally look forward to practicing their roles as preparers and preservers of harvested game every bit as much as men looking forward to harvesting and providing the game. These traditions and roles are passed on by older relatives to younger family members through in-the-field training and a system of *engii* (rules of appropriate behavior or taboos) that teach traditional means of harvest, handling, and preparation. These “engiis” emphasize traditional Ahtna views of the human place within the natural world and a respectful treatment of animals.

**Criterion 6. A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.**

The Board has concluded that the subsistence traditions of handing down the hunting and fishing knowledge, values and skills through family oriented experiences are an important aspect of the subsistence way of life in this region. Providing the opportunities for the young and old to participate in subsistence activities is critical to the perpetuation of traditional knowledge about hunting locations, hunting methods, methods of handling harvests, and respectful treatment of wildlife. To increase hunting opportunities for youth, a recent provision adopted by the Board allows a resident hunter between the ages of 10 and 17 to hunt on behalf of a resident permit holder. The youth hunter must have completed a certified Basic Hunter Education course and be in direct supervision of the permit holder, who is responsible for ensuring all legal requirements are met.

Ahtna elders have passed this knowledge on to the next generation in the context of community-based traditions that included relatively long summer and fall camping trips described above. As mentioned previously, teaching roles and lessons tend to be more formalized through the system of “engiis” than is the case for uses based out of the urban areas. Skills emphasized included not only those needed to harvest each species, but also the art of field preparation and care for a wide

variety of species and the utilization, preparation, and distribution of game. Most local users learned how to hunt in the local area from other family members in the local area. Most older, local users have also taught other family members. On the other hand, most non-local users learn about hunting in the area by personal experience or from fellow non-local, unrelated hunters. Also, non-local users tend to be controlled primarily by applicable statutes and regulations rather than long-term oral traditions and community-based values.

The Board considers it extremely important to stress the need to pass on skills and knowledge associated with utilization of all parts of the animal taken, as well as preservation of the traditional, cultural rules and family values associated with these subsistence users in this area. Field skills need to be perpetuated for handling not only the meat but the hides, internal organs, stomach, and intestines. This is consistent with the customary practice of maximizing the use of animals taken characteristic of subsistence uses.

**Criterion 7. A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.**

Widespread community-wide sharing is customary in local communities, involving all family members, elders, others in need, and taking place in formal settings such as during ceremonial potlatches. As such, sharing has associated social, cultural, and economic roles in the community. Sharing is expected and follows well-understood community standards that are structured on kinship relations and obligations. As an example, young hunters are required by Athabascan tradition to give all or most of their first harvested animal to elders and others in need. Also, traditional barter and exchange follow these standards. Successful Ahtna harvesters traditionally share some of their moose and caribou meat with other families and communities to meet their social obligations and for ceremonial purposes. This, again, is in contrast to the uses arising out of the urban areas where hunters are completely free to share, or not share, as they see fit and there is not a system of sharing, barter, and exchange. In addition to the key social and cultural roles of sharing in the local rural community, sharing of subsistence resources plays a key economic role in distributing essential food supplies throughout the community. The Board has concluded it is imperative to accommodate the customary and traditional family and community harvest sharing practices as part of the subsistence way of life to the maximum extent possible.

Use of the state authorized proxy system has provided a limited opportunity for individuals to harvest for permittees who are personally incapable of participating in the field but who have a personal history of subsistence use. Proxy hunters are not required to fully accommodate the customary and traditional practices. Non-local users, on the other hand, tend to have few established rules or traditions requiring sharing, and seldom share outside of their own households. External sharing, when it occurs, is usually with friends and co-workers, and extensive kinship networks are absent. There are no non-local traditions of community-wide meat distribution.

**Criterion 8. A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of the fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.**

The Board has concluded it is critical to emphasize the values associated with the reliance and dependence on a wide variety of fish and wildlife resources as an important element of the subsistence way of life for this region. Subsistence use patterns historically required a significant dedication of time and effort towards the harvesting of adequate fish and game resources to meet the protein and nutritional requirements of the subsistence harvesters, their families, and their communities.

This differs markedly from the more recreational type of uses arising out of the Alaska's more urban areas, where a single, focused effort to harvest only one resource in any given location, and then salvage only what is legally required from that resource, tends to be a predominant characteristic. To the extent that other foodstuffs are harvested, they are often harvested in completely separate areas, far removed from the fall hunting area. Also, different hunting areas are explored in different years. This separation of the interconnected diversity of resource uses also seriously undermines the principles reflected in Criterion 3. As more and more emphasis is placed on single species harvesting patterns, cost is increased, and efficiency is reduced. Such practices do not reflect the customary and traditional use pattern.

Reliance on most, or all, locally available sources of wild food is characteristic of a traditional subsistence way of life where maximum economic and nutritional benefits typically must be derived from the hunt and harvests. The local harvest of salmon has historically been the most important wildlife resource in terms of useable pounds per subsistence-dependent family in Unit 13. Alaska residents are allowed to use a fish wheel in the Copper River between Slana and the Copper River bridge at Chitina to harvest salmon—permits are issued free of charge. The limit is 500 total salmon for a household with two or more members and 200 for a household with one member, with no limit on the number of Chinook salmon in the total harvest by fish wheel. The salmon run in the Copper River is primarily comprised of sockeye and Chinook salmon.

Use of moose and caribou by local communities is embedded in a wide range of other fish and wildlife uses. It is also embedded in a mixed, subsistence-cash economy characterized by seasonal employment and relatively low cash incomes. A wide variety of subsistence foods are still critically important in these local economies. Almost all hunting, fishing, and gathering takes place locally and the majority of meat and fish consumed tends to come from local sources.

Big game species are taken for food and not for their trophy value by families engaged in subsistence uses. The Board may undertake efforts to reduce or eliminate the trophy values of the resources taken to focus entirely on the inherent subsistence values.

Vote: 6/0  
November 12, 2006  
Anchorage, Alaska

  
Ron Somerville, Chairman  
Alaska Board of Game

**Findings for the Alaska Board of Game  
2006-169-BOG**

**Unit 19D-East Intensive Management Supplemental Findings  
May 14, 2006**

The Board of Game finds as follows, based on information provided by Department staff and residents and users of moose in Unit 19D-East. These findings are supplemental to the findings set forth in 5AAC 92.108, in the Unit 19-East predation control implementation plan in 5 AAC 92.125 and in Board of Game Findings 2006-164-BOG.

1. The moose population size, currently estimated to be 3,444-5,281 moose, is less than the population objective of 6,000-8,000 moose. The population objective has not been achieved for at least the last 5 years.
2. The Unit 19D-East moose harvestable surplus, as described in 5 AAC 92.106(3)(A), currently estimated at 138-158 bulls, is less than the harvest objective of 400-600 moose. The harvest objective has not been achieved for at least the last 5 years.
3. The Unit 19D-East moose population is, thus, depleted and reduced in productivity, which has already resulted in a significant reduction in the allowable human harvest of the population.
4. Enhancement of abundance or productivity is feasibly achievable utilizing the recognized and prudent active management technique of predator control.
5. The Board has repeatedly, since 1995, been required to significantly reduce the taking of moose in Unit 19D-East by restricting harvest, seasons and bag limits as compared to the level and timing of hunting opportunity that was allowed when the population was not depleted and reduced in productivity.
6. The population and harvest objectives have not been achieved, at least in part, because wolf, black bear, and brown bear predation have been important causes of mortality in the population, to the extent that the population is unlikely to recover, and objectives are unlikely to be achieved, in the foreseeable future unless predator control is conducted.
7. The Department will apply the following conditions to brown bear control permits in addition to any other conditions considered necessary:
  - a. Cubs or females with cubs may not be taken. For purposes of this program "cub" is defined according to 5 AAC 92.990 (a)(12).
  - b. A valid Alaska State resident hunting license is required.
  - c. Permits are valid from the date of issuance through June 30 or until the control program is closed by emergency order.

d. Bears may be taken with the use of bait or scent lures subject to the following restrictions:

-For purposes of this control program "bait" means any material, including scent lures, that is placed to attract an animal by its sense of smell or taste. Bait does not include those parts of legally taken animals that are not required to be salvaged as edible meat if the parts are not moved from the kill site.

-Only biodegradable materials may be used for bait; only the bones, viscera or skin of legally acquired fish and game may be used for bait.

-A person may not use bait or scent lures within one-quarter mile of a publicly maintained road or trail.

-A person may not use bait or scent lures within one mile of a house or other permanent dwelling, or within one mile of a developed campground or developed recreational facility.

-A person using bait or scent lures shall clearly identify the site with signs at all access points reading "brown bear control bait station" that also displays the person's control program permit number.

-A person using bait shall remove bait, litter and equipment from the bait station site as required by the control permit.

8. Reducing predation can reasonably be expected to aid in achievement of the population and harvest objectives.

9. A person who has been airborne may on the same day take a brown bear with the use of bait or scent lure as authorized under a permit providing the permittee is at least 300 feet from the airplane at the time of taking.

Vote: 6-0-1  
May 14, 2006  
Anchorage, Alaska

  
Mike Fleagle, Chairman  
Alaska Board of Game

**Findings for the Alaska Board of Game  
2006-168-BOG**

**Unit 19A Intensive Management Supplemental Findings  
May 14, 2006**

The Board of Game finds as follows, based on information provided by Department staff and residents and users of moose in Unit 19A. These findings are supplemental to the findings set forth in 5AAC 92.108, in the Unit 19A predation control implementation plan in 5 AAC 92.125, and in Board of Game Findings 2004-150-BOG.

1. The moose population size, currently estimated to be 2,700-4,250 moose, is less than the population objective of 7,600-9,300 moose (derived from the combined Units 19A and 19B objective based on proportionate area). The population objective has not been achieved for at least the last 5 years.
2. The Unit 19A moose harvestable surplus, as described in 5 AAC 92.106(3)(A), there is no harvestable surplus in eastern Unit 19A (upstream from and excluding the George River drainage), excluding the Lime Village Management Area. In western Unit 19A (downstream from and including the George River drainage), the harvestable surplus is 60 bulls. This is less than the harvest objective of 400-550 moose (also based on proportionate area). The harvest objective has not been achieved for at least the last 5 years.
3. The Unit 19A moose population is, thus, depleted and reduced in productivity, which has already resulted in a significant reduction in the allowable human harvest of the population.
4. Enhancement of abundance or productivity is feasibly achievable utilizing the recognized and prudent active management technique of predator control.
5. The Board has repeatedly, since 2002, been required to significantly reduce the taking of moose in Unit 19A by restricting harvest, seasons and bag limits as compared to the level and timing of hunting opportunity that was allowed when the population was not depleted and reduced in productivity.
6. The population and harvest objectives have not been achieved, at least in part, because wolf predation has been an important cause of mortality in the population, to the extent that the population is unlikely to recover, and objectives are unlikely to be achieved, in the foreseeable future unless predator control is conducted.
7. Reducing predation can reasonably be expected to aid in achievement of the population and harvest objectives.

Vote: 6-0-1  
May 14, 2006  
Anchorage, Alaska

  
Mike Fleagle, Chairman  
Alaska Board of Game

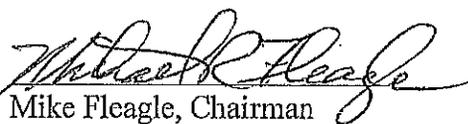
**Findings for the Alaska Board of Game  
2006-167-BOG**

**Unit 16 Intensive Management Supplemental Findings  
May 14, 2006**

The Board of Game finds as follows, based on information provided by Department staff, Alaska residents and users of moose in Unit 16B. These findings are supplemental to the findings set forth in 5AAC 92.108 and in the Unit 16 predation control implementation plan in 5 AAC 92.125.

1. The moose population size, currently estimated to be 3193-3951 moose, is less than the population objective of 6,500-7,500 moose. The population objective has not been achieved for at least the last 9 years.
2. The Unit 16B moose harvestable surplus, as described in 5 AAC 92.106(3)(A), currently estimated at 140 bulls, is less than the harvest objective of 310-600 moose. The harvest objective has not been achieved for at least the last 6 years.
3. The Unit 16B moose population is, thus, depleted and reduced in productivity, which has resulted in a significant reduction in the allowable human harvest of the population.
4. Enhancement of abundance or productivity is feasibly achievable utilizing the recognized and prudent active management techniques of predator control.
5. The Board has repeatedly, since 1990, been required to significantly reduce the taking of moose in Unit 16B by restricting harvest, seasons and bag limits as compared to the level and timing of hunting opportunity that was allowed when the population was not depleted and reduced in productivity.
6. The population and harvest objectives have not been achieved, at least in part, because wolf black and brown bear predation have been important causes of mortality in the population, to the extent that the population is unlikely to recover, and objectives are unlikely to be achieved, in the foreseeable future unless predator control is conducted.
7. Reducing predation can reasonably be expected to achieve the population and harvest objectives.

Vote: 6-0-1  
May 14, 2006  
Anchorage, Alaska

  
Mike Fleagle, Chairman  
Alaska Board of Game

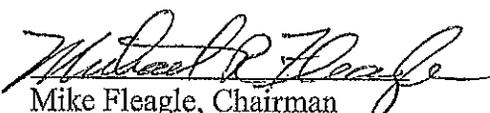
**Findings for the Alaska Board of Game  
2006-166-BOG**

**Unit 13 Intensive Management Supplemental Findings  
May 14, 2006**

The Board of Game finds as follows, based on information provided by Department staff, Alaska residents and users of moose in Unit 13. These findings are supplemental to the findings set forth in 5AAC 92.108 and in the Unit 13 predation control implementation plan in 5 AAC 92.125.

1. The moose population size, currently estimated to be 13,020 moose, is less than the population objective of 17,600-21,900 moose (derived by combining the objectives for all subunits). The population objective has not been achieved for at least the last 10 years.
2. The Unit 13 moose harvestable surplus, as described in 5 AAC 92.106(3)(A), currently estimated at 520-650 bulls, is less than the harvest objective of 1,050-2,180 (also combined subunit objectives). The harvest objective has not been achieved for at least the last 13 years.
3. The Unit 13 moose population is depleted, reduced in productivity, and has already resulted in a significant reduction in the allowable human harvest of the population.
4. Increase in abundance and productivity is achievable utilizing the recognized and prudent active management technique of predator control.
5. The Board has repeatedly, since 1999, been required to significantly reduce the taking of moose in Unit 13 by restricting harvest, seasons and bag limits as compared to the level and timing of hunting opportunity that was allowed when the population was not depleted and reduced in productivity.
6. The population and harvest objectives have not been achieved, at least in part, because wolf and brown bear predation have been important causes of mortality in the population, to the extent that the population is unlikely to recover, and objectives are unlikely to be achieved in the foreseeable future unless predator control is conducted.
7. Reducing predation can reasonably be expected to achieve the population and harvest objectives.

Vote: 6-0-1  
May 14, 2006  
Anchorage, Alaska

  
Mike Fleagle, Chairman  
Alaska Board of Game

**Findings for the Alaska Board of Game  
2006-165-BOG**

**Unit 12 and 20E Intensive Management Supplemental Findings  
May 14, 2006**

The Board of Game finds as follows, based on information provided by department staff and residents and users of moose in Units 12 and 20E. These findings are supplemental to the findings set forth in 5AAC 92.108, in the Units 12 and 20E predation control implementation plan in 5 AAC 92.125 and in Board of Game Findings 2006-164-BOG.

1. The Fortymile Caribou Herd population size, currently estimated to be 40,000-42,000 caribou, is less than the population objective of 50,000-100,000 caribou. The population objective has not been achieved for at least the last 30 years.
2. The Fortymile Caribou Herd harvestable surplus, as described in 5 AAC 92.106(3)(A), currently estimated at 840-880 bulls, is less than the harvest objective of 1,000-15,000 caribou. The harvest objective has not been achieved for at least the last 30 years.
3. The moose population size in Unit 12 north of the Alaska Highway and Unit 20E, currently estimated to be 4,300-5,200 moose, is less than the population objective of 8,744-11,116 moose (derived from the combined Units 12 and 20E objectives based on proportionate area). The population objective has not been achieved for at least the last 20 years.
4. The harvestable surplus of moose in Unit 12 north of the Alaska Highway and Unit 20E, as described in 5 AAC 92.106(3)(A), currently estimated at 135-201 bulls, is less than the harvest objective of 547-1,084 moose (derived from the combined Units 12 and 20E objectives based on proportionate area). The harvest objective has not been achieved for at least the last 20 years.
5. The Fortymile Caribou Herd and the moose population in Unit 12 north of the Alaska Highway and Unit 20E are, thus, depleted and reduced in productivity, which has already resulted in a significant reduction in the allowable human harvest of the population.
6. Enhancement of abundance or productivity of both moose and caribou in this area is feasibly achievable utilizing the recognized and prudent active management technique of predator control.
7. The Board has repeatedly, since 1976, been required to significantly reduce the taking of Fortymile caribou by restricting harvest, seasons and bag limits as compared to the level and timing of hunting opportunity that was previously allowed when the population was not depleted and reduced in productivity.

8. The Board has, since 2000, been required to limit the taking of moose in Unit 12 north of the Alaska Highway and Unit 20E by restricting harvest, seasons and bag limits as compared to the level and timing of hunting opportunity that was allowed when the population was not depleted and reduced in productivity.

9. The population and harvest objectives for both moose and caribou in this area have not been achieved, at least in part, because wolf and brown bear predation have been important causes of mortality in the populations, to the extent that the populations are unlikely to recover, and objectives are unlikely to be achieved, in the foreseeable future unless predator control is conducted.

10. Reducing predation can reasonably be expected to aid in achievement of the caribou and moose population and harvest objectives.

11. A person who has been airborne may on the same day take a brown bear with the use of bait or scent lure as authorized under a permit provided by the Department, providing the permittee is at least 300 feet from the airplane at the time of taking.

Vote: 6-0-1  
May 14, 2006  
Anchorage, Alaska

  
Mike Fleagle, Chairman  
Alaska Board of Game

**Findings of the Alaska Board of Game  
2006-164-BOG**

**BOARD OF GAME BEAR CONSERVATION AND MANAGEMENT POLICY  
MAY 14, 2006**

**GENERAL BEAR MANAGEMENT**

**Purposes of Policy**

1. To assure all management actions provide for the conservation of Alaska's bear species, their habitat and food sources, and are consistent with the Alaska Constitution, and applicable statutes.
2. To encourage review and comment and interagency coordination for bear management activities.

**Goals**

1. To ensure the long-term conservation of bears throughout their historic range in Alaska.
2. To increase public awareness and understanding of the uses, conservation, and management of bears and their habitat in Alaska.

**Background**

Brown/grizzly bears (*Ursus arctos*) are large omnivores found throughout most of Alaska. Although they are considered the same species, brown and grizzly bears occupy different habitats and have somewhat different lifestyles and body configurations. Grizzlies are typically found in interior and northern areas. They are generally smaller than brown bears and more predatory. Brown bears live in coastal areas of southern Alaska where they have access to productive salmon streams.

Brown/grizzly bears are found throughout their historic range in Alaska, and unlike populations in the contiguous 48 states, they are not considered a threatened or endangered species. Estimating precise population numbers is difficult because of the bears' secretive habits and often densely vegetated habitat, but in most places in the state, populations are considered stable or increasing. Throughout most coastal habitats where salmon are abundant, bear densities typically exceed 175 bears/1,000 km<sup>2</sup> (450 bears/1,000 mi<sup>2</sup>). A population in Katmai National Park on the Alaska Peninsula was measured at 550 bears/1,000 km<sup>2</sup> (1,420 bears/1,000 mi<sup>2</sup>). In most interior and northern coastal areas, densities do not exceed 40 bears/1,000 km<sup>2</sup> (100 bears/1,000 mi<sup>2</sup>).

Densities as low as 7 bears/1,000 km<sup>2</sup> (20 bears/1,000 mi<sup>2</sup>) have been measured in the eastern Brooks Range. Extrapolations from existing density estimates yielded an estimate

of 31,700 brown bears in 1993. All indications are that the population has increased in the past decade.

American black bears (*Ursus americanus*) are generally found in forested habitats throughout the state. Black bears also occupy their historic range in Alaska, often overlapping distribution with brown/grizzly bears. Because they live in forested habitats it is very difficult to estimate population size or density. Where estimates have been conducted in interior Alaska, densities ranged from 67 bears/1,000 km<sup>2</sup> (175 bears/1,000 mi<sup>2</sup>) on the Yukon Flats to 289 bears/1,000 km<sup>2</sup> (750 bears/1,000 mi<sup>2</sup>) on the Kenai Peninsula. In coastal forest habitats of Southeast Alaska's Alexander Archipelago black bear densities are considered high. A 2000 estimate for Kuiu Island was 1,560 black bears/1,000 km<sup>2</sup> (4,000 black bears/1,000 mi<sup>2</sup>). A statewide black bear population estimate is not available because, unlike the many brown/grizzly bear and wolf estimates that are available across the state, very few black bear population estimates have been conducted.

Brown/grizzly bears have relatively low reproductive rates and require abundant resources. Black bears exhibit higher reproductive rates than brown/grizzly bears; however, rates are still lower than for other big game animals with the exception of brown/grizzly bears. Population stability can be threatened by human-caused mortality and from fragmentation or destruction of habitat. This combination is present to a sufficient extent on the Kenai Peninsula that brown/grizzly bears there have been designated by the State as a "population of special concern". To address situations where bear populations have declined because of human activities, the Department has implemented remedial management actions. In the Kenai situation, a conservation strategy has been developed through a public stakeholder process.

In most areas of the state black bear populations are healthy and can sustain current or increased harvest levels. However, in some areas such as Unit 20B and 20D in the interior, the Kenai Peninsula, and Southeast Alaska, hunter demand for black bears is high, harvest is high, and these populations require closer monitoring. Bears are intelligent animals that learn to adapt to new situations. This ability, coupled with their enduring drive to rebuild fat reserves prior to denning, makes bears experts in finding ways to get a meal. Garbage is often a source of food from people. If this happens, bears learn to exploit human-related food resources and lose their natural tendencies to avoid people. Frequently, such bears become classified as "nuisance" bears and often are killed in defense of life or property (DLP).

Respected by most, and feared by many, bears can pose a threat in certain situations. Statewide, there are an average of about six encounters a year in which a human is injured. About half of those involve hunters in search of other quarry. About every two or three years, one of the attacks results in a human fatality.

Whenever bears and people interact with each other there are potential benefits and dangers. Displacing bears from feeding sites has serious consequences for them. Human behavior around bears not only impacts their own personal safety and viewing experience,

it also impacts the health and safety of the bears and the people who come to the area later. When bears and people meet, it is important that bears never get food from them and that people are trained how to react to bear encounters. Comprehensive education is recognized as a vital component in all aspects of any bear viewing program.

Public interest in bears has increased dramatically in Alaska during the past decade. Some of this interest is incidental to other pursuits such as sport fishing, hiking, flight seeing, eco-tours, or marine water cruises but some of it is specifically targeted at bear viewing. Bear viewing is a rapidly growing industry in selected areas of the state. The interest exceeds the opportunities provided now by such established and controlled sites as McNeil River, Pack Creek, Anan Creek, Wolverine Creek and Brooks Camp. As a result, private entrepreneur businesses are providing viewing opportunities in some high-density bear areas. Many of these sites and programs involve highly habituated bears that most frequently result in mutually exclusive conflicts with other uses of bears. Habituation of bears should be discouraged and maximum public benefits pursued by providing management programs designed to provide for public viewing opportunities in areas where other uses are already excluded or to carefully integrate uses on a time and area basis.

Alaska is world-renowned as a brown/grizzly bear hunting area. Alaska is the only place in the United States where they are hunted in large numbers, and the vast majority of record book bears come from the state. An average of about 1,500 brown/grizzly bears are harvested each year. The trend has been increasing. Many of the hunters are nonresidents and their economic impact is significant to Alaska. Hunters have traditionally been the strongest advocates for bears and their habitat, providing consistent financial and political support for research and management programs.

Because bears can be both prey and predator, their relationship with people is complex. In areas where a population of large ungulates has been reduced to low levels, bears may have a significant influence on the decline of species such as moose, caribou and deer. This is especially true when bears are found in combination with thriving wolf populations. Alaskan studies of bear interactions with moose, for instance, indicate that bears may contribute significantly to calf mortality. Coupled with wolf predation, the combined mortality rates can far exceed human induced mortality and contribute to major moose population declines, depressed populations and delayed recoveries. The role of bears in these situations greatly exacerbates the debate over predator control and complicates evaluation of potential and initiated management actions.

### **Guiding Principles**

1. Manage bear populations to allow a wide range of human uses, while providing for long-term bear population sustainability.
2. Establish minimum population goals that ensure the long-term viability of bears recognizing the reproductive capacity of each bear species.
3. Manage bears at the scale of subunits or units to achieve appropriate overall predator-prey relationships rather than pursue single species management.
4. Protect the genetic diversity of bears.
5. Continue and, if appropriate, accelerate research for the management of bears.

6. Consider short-term and long-term effects of habitat loss and fragmentation on bear populations.
7. Provide for consumptive and non-consumptive uses of bears in management plans and encourage economic benefit to the state and its citizens while maintaining sustainable bear populations.
8. Do not allow identified prey populations to decline to a point where predation keeps them at low levels.
9. Avoid, where possible, activities that encourage the habituation of bears and manage bear viewing opportunities that are not mutually exclusive of other uses.
10. Encourage wildlife viewing of bears and other species in their natural settings as part of a broader outdoor experience.
11. Implement this policy in such a manner that the Department and the Board can respond promptly to unforeseen situations.
12. Pursue informational and educational efforts to help the public understand more about bears and their management.
13. Work with enforcement agencies to identify priorities and to assist with and encourage adequate enforcement activities.
14. Review and recommend revision to this policy as needed.

## **Conservation and Management**

### *A. Management Strategies*

The Department will manage both bear species differently according to their population and human use characteristics in different parts of the state. In some areas, such as the Kodiak Archipelago, portions of Southeast Alaska and the Alaska Peninsula, bears are managed for trophy-hunting and viewing opportunities. In many other areas of the state, bear populations are largely unaffected by human harvest. Bears are an important big game species sought by resident and nonresident hunters and are managed for a variety of objectives.

Generally, bear hunting will be conducted on a sustained yield basis, except in areas where a bear predation control program is authorized. Harvests will not be allowed to threaten the long-term population survival of bears. In most areas of the state, sustained brown/grizzly bear harvests will generally be 4-8 percent of the estimated total population and up to 12 percent for black bears. Some bear populations may be able to sustain a harvest above these guidelines and these will be evaluated for more liberal harvest programs. Lacking precise population data, managers will continue applying indirect parameter to assess the status of bear populations.

All brown/grizzly bears harvested under the general hunting regulations must be inspected and sealed by a Department representative. Black bears must be sealed in some units but not all. Non-resident hunters of brown/grizzly bears must be accompanied in the field by a registered big game guide or a resident relative. For both species, sows accompanied by cubs, and the cubs, are protected, but cubs are defined as bears in their first year of life for

black bears and for the first two years of life for brown/grizzly bears. The Department will continue to maintain these strategies and regulations for most of the state, unless it is necessary to consider methods to increase bear harvests as part of a bear predator control program.

The effect of management actions on the economic contribution of bears to Alaska's users of bears should be considered. Maintaining a regulatory structure that assures reasonable standards of data integrity with responsible management strategies and population sustainability will help avoid threats of international sanctions. Large areas of the state have subsistence brown/grizzly bear hunts with liberal seasons and bag limits, mandatory meat salvage, and relaxed sealing requirements. The Department will continue to accommodate subsistence needs and will consider the impacts on subsistence activities.

Bear viewing and bear/human interactions are also important aspects of bear management in Alaska. Increasing interest in watching bears at concentrated feeding areas such as salmon streams and sedge flats is challenging managers to find appropriate levels and types of human and bear interactions without jeopardizing human safety or bears or other legitimate uses of bears. Bear hunting and viewing are compatible in many situations. However, there are areas where the two uses are potentially mutually exclusive. Land and wildlife managers are faced with tough decisions that could either minimize those conflicts or promote single use regulations at the expense of other uses. For instance, federal withdrawals totaling over 40 million acres are managed to protect large segments of Alaska's big game resources habitat and major portions of these areas provide park-like observation opportunities. Logically these areas could first be utilized for habituated wildlife viewing opportunities before traditional uses of bears and other wildlife are unnecessarily impacted in other areas. Bear management programs on state and private lands should be designed to achieve maximum benefits to Alaskans. Specifically, state management programs should avoid habituating bears wherever possible. Conflicts between user groups can frequently be reduced if viewing programs adopt "best viewing practices."

In areas where bear management plans have been developed, the Department will adhere to the recommendations included in those plans as long as they are consistent with the newest policies and regulations adopted by the Board.

Nothing in this policy affects the authority under state or federal laws for an individual to protect human life or property from bears (5 AAC 92.410). All reasonable steps must be taken to protect life and property by non-lethal means before a bear is killed.

#### *B. Research Strategies*

Developing and implementing precise, cost-effective methods for determining bear populations will continue to be a research priority for the Department. Work to date suggests that no single population estimation method will work across the state given the vast areas, varied topography, differing vegetation communities and great differences in bear density. Some methods work well in one area but not in another. Aerial stream

surveys, line-transect surveys, capture-mark-recapture, intensive aerial surveys, and DNA analysis are some of the tools that can be utilized to provide population estimates.

Predator-prey relationships between bears and large ungulates have not been thoroughly examined in most of the state. Bears use a wide variety of foods seasonally including vegetation, fish, mammals, birds, and carrion and they are exceptionally adaptable in their ability to capitalize on available food resources. Consequently, the impact of ungulate prey abundance on bears is difficult to ascertain. Similarly, the impact of bears on prey populations is multifaceted and can be further compounded by the presence of other predators such as wolves.

Where appropriate, the Department will cooperate in research efforts with other agencies. Research findings will be reported in a timely fashion and presented in a form that is easily understood by the public.

### *C. Information and Education Strategies*

Public education is critical in any bear management program. Perhaps as much as any species in Alaska, bears elicit a wide variety of emotions, have myriad uses, and directly impact peoples' lives both in the field and near settlements. Clear, objective information is necessary for citizens and managers alike to make wise decisions when dealing with bears. As the agency primarily responsible for bear management, the Department must take a lead role in producing and disseminating this information.

Bear information will be developed for a wide range of audiences and be delivered in a variety of media. A principal focus of bear education will be to promote a better understanding of life history, behavior, and habitat associations. Specific messages will include discussions of bear/human interactions, bear hunting, bear viewing, and bear predation on moose, caribou, and sheep. To assure consistent and accurate presentation of bear information, the Department will continue to work with the Alaska Interagency Bear Safety Education Committee.

The Department will strive to include the public in all bear management decisions. The primary method of public involvement will be through existing local Fish and Game Advisory Committee and Board processes. Citizen-driven bear management plans will be sponsored and supported by the Department. To date, such plans have been developed for Game Management Unit 4, the Kenai Peninsula, and the Kodiak Archipelago. The Department is committed to implementing as many of the recommendations from bear management plans as possible.

Because of the economic importance of guiding and other commercial enterprises associated with the varied uses of bear, it is recommended that extra efforts are made to notify all concerned parties that area specific predator control activities are being considered.

## BEAR PREDATION MANAGEMENT

### Purpose of Policy

1. To guide the Board of Game (Board) and the Alaska Department of Fish and Game (Department) in implementing any bear predation management actions pursuant to AS 16.05.255(e) and 5 AAC 92.106, when the Board determines ungulate populations important for human consumption are being kept at low levels because of bear predation.

### Goals

1. To provide guidelines for developing, implementing, and evaluating bear management actions designed to reduce bear specific predation in precise areas for specific time periods required by predator control implementation plans.

### Background

In areas where the Board has authorized for intensive management (IM) activities, set IM population and harvest objectives and those objectives are not being met and bear predation has been found to be a major factor in the decline in prey populations or in keeping prey populations from recovering, the Board can authorize bears to be included in predator control planning. Whenever bears are considered and authorized for predator control activities, the implementation control plan must specify whether one or both bear species are to be considered in the control plan.

Based on careful consideration of scientific information and public comment, the Department and the Board believe that in some limited circumstances it may be beneficial and appropriate to control predation by bears to achieve population and human use objectives.

### Guiding Principles

1. Where bear reductions are authorized, the first step should be to reduce bear numbers through general hunting provisions such as liberalized seasons, bag limits, hunting methods and means and tag wavers.
2. Where predation regulates prey populations, identify to the extent possible, the relative contribution by each primary predator species so that management response can be focused and effective.
3. Implement measures to reduce black and/or brown bear numbers to allow prey species to increase population management objectives in areas managed for high consumptive use where predation by bears itself or in combination with other predators is keeping prey at low levels.
4. Manage bears at the appropriate scale that may vary from an entire Game Management Unit to a specifically defined area (e.g. key calving sites).
5. If liberalization of general hunting provisions does not adequately reduce the target bear population, an additional control program may be authorized. This program should be conducted for the minimum time necessary to achieve the stated

management objectives and may utilize methods and means not approved for general hunting.

6. Consider the management goals and objectives of state, federal, and private land owners and work cooperatively with them to design, implement, and evaluate bear control activities.
7. Encourage federal and private land owners, where possible, to work cooperatively in any management and/or species control programs.
8. If reduction in bear numbers fail to result in reasonable increases in availability of prey populations for human use, management practices intended to reduce bear populations should be reconsidered.

### **Management Strategies**

In areas where bears have been identified as an important component in reducing and/or holding prey populations well below objectives, higher harvest levels than those listed under general management strategies will be allowed. In these areas, specific harvest reporting conditions will be imposed which may include additional requirements for permits, sealing, and/or reporting. In addition, the Department will closely monitor the effects of higher harvest on the bear and prey populations.

### **Research Strategies**

In areas where bear predation control programs are considered, the Department may conduct research to quantify the contributions of each bear species and of wolves to the causes of decline in the ungulate population important for human use. Alternatively, the Department may use standard survey and inventory data and interpretation of other research results to guide the decision-making process. Monitoring activities designed to determine the effects of high levels of bear harvest on recovery of depressed ungulate populations would help focus management efforts in the most cost-effective manner.

### **Information and Education Strategies**

In any situation where the Board or Department believes bear predation control may become necessary, the public will be informed as soon as possible. Detailed information on the specific location, the predator, prey and habitat concerns, and the proposed management action and its anticipated costs and duration will be widely disseminated. Public meetings may be held in the affected area and in major Alaska communities, in addition to regularly scheduled Board and Advisory Committee meetings. Once implemented, the Department will provide the Board and the public with an annual report and evaluation of the management action.

### **Board Consideration**

The Board may consider bear control on a bear species when:

1. Bear predation has been determined to be an important factor in the decline of a prey population or is preventing recovery of a low density prey population.

2. Bear predation is an important factor preventing attainment of approved prey population of human-use objectives.
3. Efforts to control bear predation can be reasonably expected to achieve improvement in sustainable human use of ungulates.

If the Department or the Board determines that one or more of these conditions exist in a given IM area, at the Board's direction, an implementation plan will be prepared for public review.

It is the intent of the Board of Game that bear control programs authorized under this policy shall be directed at only specified target areas and is not intended for implementation under general hunting regulations.

Under methods and means the Board may selectively consider:

- Relocation
- Sterilization
- Use of communications equipment between hunters or trappers
- Sale of hides and skulls as incentive
- Use of bears for handicraft items for sale
- Trapping
- Bear baiting
- Changing the definition of a legal bear
- Same day airborne taking, except aerial shooting
- Diversionary feeding

Vote: 7/0  
May 14, 2006  
Anchorage, Alaska



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Mike Fleagle, Chair  
Alaska Board of Game

**Alaska Board of Game Findings**  
**Trapping and Wolf Snaring in Alaska**  
**98-119-BOG**

At its March, 1998 meeting in Fairbanks, the Board of Game considered several proposals that restrict or eliminate the use of snares for harvesting wolves and other trapping concerns. Extensive public testimony and advisory committee reports regarding concern over the reduction or loss of snares as a method of harvesting wolves, and other trapping concerns was also received on both the proposals and the potential ballot initiative banning wolf snaring.

Based on this testimony and information provided by the Division of Wildlife Conservation and the Division of Fish and Wildlife Protection, and considerable deliberation, the BOG makes the following findings:

1. Snares are an important harvest tool for Alaska trappers, and the restriction or removal of that tool will result in personal and financial hardship for trappers and others dependent on the fur trade for their livelihood. In most areas of Alaska, economic opportunities are few, and the inability to harvest wolves with snares will lead to significantly reduced income levels in already depressed communities.
2. The harvest of wolves, through regulated methods and means, is an important management tool used by the Department of Fish and Game and the BOG in maintaining harvestable quantities of big game species, and is considered to be an important factor in the management of those species. Restricting or eliminating the use of snares to harvest wolves will reduce wolf harvest numbers, leading to potential predator to prey ratio imbalances and low moose and caribou densities in many areas.
3. It is strongly substantiated through many years of scientific monitoring and research that wolves are a highly prolific, productive and resilient species, capable of sustaining consistent harvestable surplus rates of over 30% annually on any given wolf pack. The annual reported harvest from Alaska's estimated wolf population of 7000 seldom exceeds 20% in a given area or statewide under existing harvest and management regimes.
4. The source of the data used by snaring opponents and ballot initiative supporters is the result of an intensive wolf trapping and snaring program conducted by the Department of Fish and Game in 1993-1994 in GMU 20A. It can not be considered representative of common trapping practices. Trappers use varying numbers of snares at a set, rarely more than 12, determined by location and prevailing conditions. There is no evidence that trappers use snares set in the manner of a drift net, or that they set snares in multiple heights.
5. The rate of incidental catch by trappers of non-target species such as moose, caribou, eagles, ravens, and bears is very low, due to the careful and exact placement of their snares, and the timing of trapping seasons, in habitats, locations, and configurations that minimize catch of other species. Other species of furbearers caught in wolf snares, such as fox, wolverine and lynx, are desirable and legal, and are not considered to be incidental non-target catches to the trapper.
6. The instances of wolves being caught around other parts of the body, such as the legs and feet are rare. In cases where wolves are caught around the foot, the snare rarely breaks the flesh. Most wolves caught in snares are caught around the neck, leading to swift and humane death. A very small

percentage of wolves are caught around the torso. These wolves are usually still alive when the trapper returns to the set.

7. We heard widespread public support among Alaska residents, particularly those residing in rural areas, for the use of snares by trappers to harvest wolves. There is no evidence to support the notion that the bush communities support a ban on wolf snares.
8. Alaska trappers are conscientious and operate within the laws and regulations governing trapping. Snares are rarely left operable at the end of the season. Snares are valuable to the trapper, and great effort is made to recover snares set in the field.
9. Regulated trap checks are not reasonable in Alaska, considering climatic conditions, length of traplines, and other considerations that would make a time limit impossible to comply with.
10. Trap identification is not warranted at this time. Trappers have experienced harassment by those against trapping and worry about the information being made available to the public. The Alaska Trappers Association assists law enforcement officers in determining who traps belong to. Most traplines are well known by other people and Department staff, further assisting in the identification of those trappers.

The Board of Game found that much of the information used in the claims against snaring came from a specific intensive wolf management program. Many more snares were used per set and higher density of snares were used for a longer season in habitats not normally trapped. The area also had a higher density of moose than most of Alaska. Two grizzly bears were caught before the normal trapping season begins, and two eagles were caught in snares set by helicopter in high terrain.

It is our conclusion that the numbers used by the Alaska Wildlife Alliance and Alaskans Against Snaring Wolves are inflated and do not represent common trapping practices or actual rates of wolf harvest or incidental take of other species.

**ADOPTED DATE: March 26, 1998**  
**Fairbanks, Alaska**

*Lori Quakenbush*  
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**Lori Quakenbush, Chairman**  
**Alaska Board of Game**

97-117-BOG  
Findings of the Alaska Board of Game  
Regarding Customary and Traditional Use of Muskoxen  
on the Seward Peninsula

At its October 1997 meeting in Nome, the Board of Game took up a proposal to find a positive Customary and Traditional (C&T) finding for muskoxen on the Seward Peninsula. Muskoxen on the Seward Peninsula represented an unusual situation for the C&T determination process because muskoxen disappeared from the Seward Peninsula and have been absent from that area for at least 100 years. The muskoxen now on the Seward Peninsula were introduced in 1970 and have been protected from hunting by state law, since then. A federal hunt began on this population of muskoxen on federal lands of the Seward Peninsula in 1995-96 and more than 30 muskoxen have been harvested.

Board deliberations on the findings of a customary and traditional use lead to the following conclusions:

Criterion 1: A long-term consistent pattern of non-commercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.

While the Board of Game did not find that a consistent pattern of taking, use, and reliance on this re-established population had occurred over a period of not less than one generation (approximately 30 years), the Board did find that the reason was due to an interruption by circumstances beyond the users' control.

Muskox bones found on and near the Seward Peninsula, the lack of geographical barriers to prevent muskoxen from reaching the peninsula from known populations to the north, and a name for muskoxen in the local language provided evidence that muskoxen once inhabited the area and were known by the people. Interviews conducted by ADF&G Division of Subsistence have included elders of the Seward Peninsula who remember their elders talking about muskoxen. Although the Board found no direct evidence of use of muskoxen prior to the federal hunt established in 1995 by the residents of the Seward Peninsula, there is a much better record for the North Slope of Alaska. A large majority of the people of the Seward Peninsula are Inupiat Eskimos and share the same culture with the Inupiat of the North Slope. Had the Inupiat of the Seward Peninsula been allowed to hunt muskoxen soon after their introduction in 1970 there would be a recorded pattern of taking and use of approximately one generation at the time of this request for a finding. It is reasonable to assume the use of muskoxen would be similar to that found for the Inupiat of the North Slope of Alaska.

Criterion 2: A pattern of taking or use recurring in specific seasons of each year.

A pattern of taking muskoxen during the late-winter and spring has developed during the recent federal hunt. Even though the hunt was established with specific seasons, extensions have been granted to accommodate the developing pattern of taking.

Criterion 3: A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.

The primary transportation is by snowmachine and foot without the use of aircraft or other expensive commercial services. The Board heard testimony that the harvest would be more efficient and economical if the hunters were not forced to travel farther from their villages to hunt on more distant federal lands.

Criterion 4: The area in which the noncommercial, long-term and consistent pattern of taking, use, and reliance upon the fish stock or game population has been established.

For this criterion the area has been defined by land ownership. Federal lands farther from the villages are open for muskox hunting while state and private lands closer to the villages are closed. The Board is confident that a harvest area would be established for muskoxen in the absence of the legal constraints although it would likely be somewhat different from the present area.

Criterion 5: A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.

The Board heard testimony that harvested muskoxen were being handled, prepared, preserved, and stored in the same manner as other big game subsistence species. The meat has been salvaged and used and hides have been used for warmth as blankets or clothing. There has been no trophy use of horns or hides.

Criterion 6: A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.

On the Seward Peninsula hunting traditions are known to be taught to children by their parents and grandparents. Although hunting of muskoxen was illegal between 1970 and 1995, information about muskox movements, habits and behavior, especially regarding human safety, was being transferred among generations.

Criterion 7: A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.

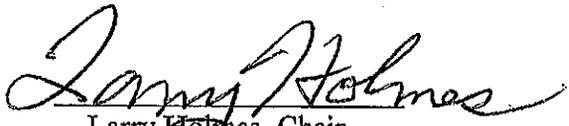
The limited number of muskoxen available to be harvested in the federal hunt have been shared widely within the communities. Sharing of big game and other wild resources is common in communities of Northwest Alaska as demonstrated by subsistence surveys indicating that large percentages of households received such gifts. The Board believe that had the harvest of muskoxen been allowed in the past, this species would be fully incorporated into the subsistence pattern of these communities.

Criterion 8: A pattern that includes taking, use, and reliance for subsistence purposes upon a wide diversity of fish and game resources and that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

Subsistence use of about 50 different species of fish, game, and plants is well documented for the Seward Peninsula communities (ADF&G Community Profile Database, Vol. 5 Arctic Region, Division of Subsistence). It is also well documented that economic opportunities for cash are few and mean household income is low, therefore wild foods are essential to many people of the Seward Peninsula.

After weighing the individual criteria, the Board found that there is a customary and traditional use of muskoxen on the Seward Peninsula. The Board believes that muskoxen were used, to the extent they were available, prior to extirpation from the peninsula, and that this sporadic use would have resumed, but for legal constraints, as soon as animals were again available. The extirpation was not within the control of current users.

Date: 11/16/97  
Anchorage, Alaska

  
Larry Holmes, Chair  
Alaska Board of Game

Vote: 4-2-1  
Fleagle absent

**ALASKA BOARD OF GAME**  
**#97-113-BOG**

**Relating to methods and means of harvesting furbearers and fur animals, including wolves.**

**WHEREAS**, the Alaska Board of Game recognizes that the harvest and utilization of Alaska's furbearers and fur animals, including wolves, remains an important use by Alaska's residents, and that restriction of methods and means of harvest could lead to economic hardship for those dependent on trapping for their livelihood, and

**WHEREAS**, Alaska Board of Game resolution #90-48-BOG supports the harvest and use of fur for clothing and other purposes, including income, by Alaska Natives and other rural residents; and Alaska Board of Fish and Game resolution #75-4-GB endorses and encourages responsible trapping as a legitimate use of our renewable Alaska fur resources, and

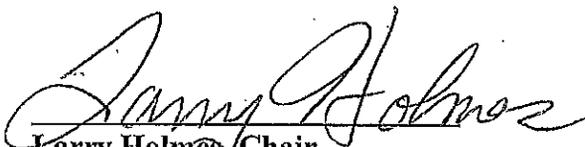
**WHEREAS**, the harvest of these furbearers and fur animals plays an important role in the management of other species, especially large game animals which are relied upon by residents for subsistence purposes, and

**WHEREAS**, Alaska's trappers use methods of harvesting fur, including the use of snares, which are the most cost-effective and efficient of harvest methods, and strive to find ways to reduce the take of non-target animals through refinement of techniques, such as "break-away" snares and other means, and

**WHEREAS**, American, and Alaskan, history is intimately tied to the fur trade and federal and state policies continue to encourage the harvest of fur, to the extent that the Alaska Board of Game and the Department of Fish and Game have historically recognized and promoted the use of traps and snares to harvest fur, as it is well known that snares have been used by indigenous peoples since long before the introduction of steel cable by early explorers.

**NOW THEREFORE BE IT RESOLVED**, the Alaska Board of Game, supports and endorses the harvest of furbearers and fur animals, including wolves, by methods and means currently permitted by law, including traps and snares.

**ADOPTED DATE:** October 30, 1997  
Nome, Alaska

  
Larry Holmes, Chair  
Alaska Board of Game

**VOTE:** 6-0-1