



Advocating for Denali's Wilderness, Wildlife and Way of life.

December 26, 2014

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Alaska Board of Game
PO Box 115526
Juneau, Alaska 99811

RE: Work Session, January 2015

Dear Members,

Representing the board and members of the Denali Citizens Council (<http://www.denalicitizens.org>), I am submitting these comments for your January 2015 Work Session. We have comments in three areas, listed below.

1. Be reluctant to move to a three year cycle for BoG meetings

a. This decision has not been adequately analyzed, financially.

Having read the materials on your website and considered the options, the DCC remains uncertain that this move is workable or the best way to cut costs. We acknowledge that cutting costs is even more important now, given recent declines in the price of oil. However, the materials on your website were not sufficiently detailed to provide a conclusive case for using the Board of Game cycle as an area for cuts. There are three areas of concern here;

i. The portion of the total budget of the ADF&G allocated to Board of Game meetings was not specified. Is this an unwieldy or excessively large portion of the total budget? A glance at the operating budget for Fish and Game does not clarify this situation. If one adds "Administrative Services," and "Boards and Advisory Committees" components, the total is around \$15 million. One would also expect the Board of Game meeting cycle might involve some portion of the "Wildlife Conservation" cost component. The portion of that cost is not specified. The total budget for the Alaska Department of Fish and Game is \$217 million dollars. Is the portion allotted to Board of Game meetings too large? The public really does not have sufficient information to provide adequate input.

ii. The Department, in its information on making the cycle change, has not provided any other financial scenarios to compare with it. The Budget for the Department of Wildlife Conservation is almost \$47 million,

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roughly a quarter of the total. Can this budget be cut in ways not related to Board of Game meetings?

- iii. Given the inadequate information on which to base a reasoned public comment, the Denali Citizens Council advocates rejecting this change at this time.

b. This decision has troubling “public process” implications.

We at DCC value the Board of Game process, although we wish the board reflected a more diverse cross section of Alaska citizen interests. There is no indication at present whether lengthening the cycle will lessen the total workload of the BoG or result in better responsiveness to Advisory Committee concerns. To the contrary, problems will occur and require attention and action. With less frequent full meetings, action is likely to be taken on an emergency basis and without due public process.

DCC has come before the Board of Game to advocate for enhanced conservation of wolves who den in Denali National Park and venture into state lands in Unit 20C. It is clear from limited state and more comprehensive National Park Service data that wolf numbers in 20C are low. This situation has caused DCC and others to bring proposals before the BoG on “buffer zone” concepts. Already, such proposals have been banned from discussion by the Board of Game until the Interior 2016 cycle. We’re concerned that a change in cycle length could require that we wait until 2017 to bring a proposal before the Board of Game. Furthermore, the proposed cycle length change does not inspire optimism that our concerns will be addressed.

2. Re-examine the management of Alaska’s resources under the IM law

The Intensive Management law may require the Department and Board to support consumptive use opportunities, but the application of this law in recent decisions of the Board of Game has not held up the spirit of the law. The purpose of the law was to provide Alaskans the opportunity to feed their families with Alaska’s wild resources, under a scientifically sustainable system. At this point, 20 years after its passage, the IM law is being invoked as an excuse to include all manner of programs, methods and means, and unscientifically examined or proved practices in the name of hunter opportunity (and not all hunters are Alaskans). We are especially concerned when the Board is approached, in the name of hunter opportunity, to do the following;

- a. Weaken regulations requiring the salvage of meat
- b. Lengthen the season on furbearing animals to those times of the year when pelts have little or no value.
- c. Allow questionably ethical activities to occur in the pursuit of game, excusing them because somehow they were “traditional” in Alaska, and that they enhance “opportunity.”

- d. Allow hunting/trapping activities that do not result in the “take” of useful products, such as meat or fur, but simply provide the opportunity to hunt or trap. Trapping regulations that do not require frequent visits to traplines, resulting in a greater likelihood of spoiled pelts, are but one example. These are state resources being trapped, and their care should be a priority for the state.
- e. The above activities are not part of what was intended by the IM Law, in the opinion of DCC.

The Board of Game serves Alaskan citizens, all of us, and we’re concerned that the Department and Board are, instead, following the “hunter opportunity” mantra into a dangerous and unethical regulatory minefield. It may be time to re-examine the Department’s policies and duties around the IM law. The department could save money through examining just how much state money is spent on providing “opportunity” versus actual tangible benefit to individual Alaskans. Is the micro-management being done under the IM law costing the state of Alaska too much money?

3. Be willing to co-operate with the Federal Government land managers in the state of Alaska. Discourage use of damaging rhetoric, like the term “federal overreach.”

There are a number of issues and problems that cross boundaries between federally managed units and state lands. The Denali wolf issue, mentioned above, is just one. Greater willingness to find a solution that satisfies a wide cross section of Alaskans would be welcome.

A recent federal regulation, promulgated to control the use of certain methods and means for take of predators on National Preserves, is sensible and worthy of state support, not the opposition we have heard. By no means would the dropping of these practices affect the actual harvest of meat resources in Alaska. We are hoping that the Department and the BoG will make a strong effort to cooperate with federal managers to reach a viable solution without name calling.

Thank you for the opportunity to provide comments for your Work Session in January. We hope you have time to consider these points as you deliberate.

Sincerely,
/s/ Nancy Bale
DCC Board of Directors