

WRITTEN PUBLIC COMMENTS

Support Proposal WP14-16: We support Proposal WP14-16 to add a winter regulatory hunt for a "Unit 11 - 1 bull moose with an open season date from November 20 to December 20, with a federal registration permit and the harvest quota to be announced by Wrangell-St. Elias National Park and Preserve, and to keep the existing fall hunt. Adding a winter moose hunt in Southern portion of Unit 11 will provide for subsistence needs. Moose are in the high country during the fall months and are difficult to harvest. Harvesting a bull moose during the winter months will help local federally qualified subsistence users harvest a bull moose when it is easier to harvest and is more accessible. A quota determined by NPS Headquarters in Copper Center will ensure that Bull Moose will not be over harvested by local federally qualified subsistence users.

Ahtna Inc. Customary and Traditional Use Committee

Support Proposal WP14-16: Access to remote areas can very often mean getting your 1 bull moose for the year. Winter access for subsistence hunters that are not connected to the grid with freezers is a very important aspect of subsistence life and the success of people living on the land in remote areas.

Donald Woodruff, Eagle

Oppose Proposal WP14-16: Winter Moose Hunts within Wrangell-St. Elias National Park. The Wrangell-St. Elias National Park Subsistence Resource Commission preference should not be used to develop the winter moose hunt. Such moose management should be based on law and policy with reference to the desired future conditions. The National Park Service (NPS) should be the sole judge of what these conditions are.

Biological Concerns

- There has never been a complete documented aerial moose survey in Game Unit 11 to determine the population and/or bull-cow ratio. Before a winter moose hunt is implemented, this information is significant to the nature and healthy balance in a National Park Service (NPS) unit.

- The State Fish and Game and the NPS have based aerial moose surveys on a very small percentage of Unit 11 north of Boulder Creek that is less than two percent of Unit 11. How can a proposed winter moose hunt be justified with such a small area documented? I suggest that the NPS conduct an aerial survey of the two areas prior to the hunt to determine if the hunt should take place and that there is an adequate population and bull-cow ratio.
- The two proposed winter hunt areas are completely opposite. The north area is more suited for moose habitat whereas the southern area is more mountainous with limited moose habitat and has never been surveyed for moose management.
- The State Game Regulation allows only spike-fork or 50" antlers to harvest moose in Unit 11. Retired Glennallen State Fish and Game Biologist, Bob Toby has stated that there are already low numbers of calf- cow ratios counted in Unit 11. If these proposed hunts are implemented will this action reduce the park envision as the desired future conditions for a natural and healthy moose population? Would this winter hunt disturb the potential breeding? Bull moose are easier to harvest during the rut and the potential for over harvesting is higher.
- With the proposed winter hunt some bulls will have shed their antlers and could be confused with cows and accidently killed potentially reducing future management moose options.
- In Unit 11 the present Federal moose hunt allows for 32 days of hunting for federally qualified local rural residents. Local residents have ATV access off the Nabesna Road and boating access to harvest moose in these areas. Will snow-machine motorized sound activity add additional stress on the breeding animals and winter feeding area?
- The NPS should develop well-defined desired future conditions that meet NPS law and policy. A benchmark should be set by the park to have a natural and healthy moose population plan to meet future needs. **The limited biological data does not support implementing this winter hunt.**

Public Safety

- During the month of November some of the rivers in the proposed winter moose areas have open thin and overflow ice posing a safety hazard for crossing.
- Adapted hunts will open up other issues involving trapping conflicts, wood cutting, green cabin logs to support subsistence and local needs in new non-traditional areas and increase other remote fuel storage issues. Other non-subsistence users may use the area for winter activities and increase pressure on winter wildlife populations and conflicts with trappers.

Conservation Concerns

- If the hunt is allowed with snow machines there must be adequate 6-8" snow cover before the hunt is conducted to protect the bare ground and vegetation. Are larger tracked vehicle going to be allowed?

- If the winter moose hunt is to take place the superintendent should set the harvest quota on the best biological information for natural and healthy populations with all the NPS Laws and Policies considered.

Other concerns

- Ninety-nine percent of the qualified local rural residents live on a road system and have commercial electrical power or generators to run freezers to keep moose meat during the present State and Federal moose hunts. Moose meat is also canned and dried jerky. Also these residents have access to alternate wildlife resources (BLM, USFWS and State Lands) and commercial food supplies (Tok, Glennallen, etc.).
- If the winter hunt is to take place the priority should be given to those that meet the criteria listed in Alaska National Interest Lands Conservation Act (ANILCA) Section 804. The recently established State Fireweed and Nizina subdivisions have increased the potential hunting pressure in the proposed southern winter hunting area.
- The south proposed winter hunt area is designated Park Wilderness and should be left undisturbed for natural moose population.
- Current sport and guided hunting has increased hunting pressure in Unit 11 driving wildlife into more remote and marginal park wilderness protected areas. These wilderness areas have more natural predator-prey habitat and potentially reducing the necessary bull-cow ration and cow-calf to maintain a natural and healthy population.

Jim Hannah, Retired NPS Chitina District Ranger/Pilot