

# **PRELIMINARY RECOMMENDATIONS**

## **Board of Game Interior Region Proposals**

**February, 2010**

*Alaska Department of Fish & Game*

*Division of Wildlife Conservation*

*The Department's recommendations are based on analysis of the proposals with available information. These recommendations may change after further analysis based on public comment or additional information.*

**PROPOSAL 1**

EFFECT OF THE PROPOSAL: Shorten the spring beaver trapping season in the remainder of Unit 20B and in Unit 20D.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement. In addition to statements in the proposal, it is important to note that despite the long season of September 25–May 31, beaver remain abundant in these areas.

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**PROPOSAL 2**

EFFECT OF THE PROPOSAL: Shorten the trapping season for lynx in Units 20 and 25C to December 1–February 28 and eliminate the 2-lynx bag limit in November.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. There is not likely to be any biological effect from this proposal. The intent of the 2-lynx bag limit in November is to allow trappers to keep a few incidentally caught lynx instead of forfeiting them to the department.

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**PROPOSAL 3**

EFFECT OF THE PROPOSAL: Require trappers to check traps in all of Region III every 72 hours.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: There is no biological reason for mandatory 72-hour trap checks. It would significantly decrease trapper opportunity and make it difficult for trappers who run long or multiple traplines to access all traps, especially after heavy snowfalls and other weather events that make travel difficult. This would also force trappers to check traps during extreme weather events, creating a safety hazard.

Frequent trap checks do not reduce the possibility of catching nontarget animals. This would only be achieved by changing methods and means. Longer trap check time does not lead to wanton waste or escapement from traps resulting in loose injured animals and/or wildlife seen with traps attached. Predation of trapped animals is not a regular occurrence and most trappers take precautions to prevent this. Also, animals typically escape from traps because they get caught in traps or snares set for a smaller species, not because of infrequent trap checks.

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**PROPOSAL 4**

EFFECT OF THE PROPOSAL: Establish a no closed hunting season for coyotes in Unit 20.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: The current hunting season for coyotes in Unit 20 is August 10–April 30. The department recommends changing the Unit 20 season to end on May 25 to align with Units 13, 14, and 16 to the south. This would provide some additional opportunity during the spring bear season for hunters to incidentally harvest coyotes. A longer coyote season may make it possible to harvest enough coyotes from small areas to improve local Dall sheep lamb survival, but is not likely to adversely affect coyote populations throughout Unit 20. Providing coyote hunting opportunity during June and July is not likely to depress coyote populations sufficiently to improve overall Dall Sheep survival in Unit 20.

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**PROPOSAL 5**

EFFECT OF THE PROPOSAL: Eliminate customary and traditional black bear hunting practices on National Park Service Lands in Units 19D and 24.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: This proposal would invalidate recent legal recognition of the long-standing cultural practices by resident hunters to harvest black bears in dens (including sows with cubs) and to use artificial light as part of this practice. These methods are part of a pattern of customary and traditional use by local residents in these areas, which was recognized by the board in November 2008 and documented in the customary and traditional use worksheet found in Division of Subsistence Special Publication No. BOG 2008-07. Testimony is also on record from the March 2008 board meeting from subsistence users requesting recognition of each of these practices as customary and traditional means to harvest black bears

Although the proposer assumes these regulations were promulgated for predation control, the board was clear that they were enacted specifically to legalize long-standing customary and traditional methods used by residents of these units to obtain black bear meat during winter. Furthermore, black bears are likely abundant (2000–4000) and are lightly harvested (50–180 estimated annual take) in these units.

The Federal Western Interior Regional Advisory Council (RAC) endorsed the traditional and customary taking of sows with cubs and cubs in dens, including the use of artificial light, for Federal lands in all of Units 19, 21, and 24. The Eastern Interior RAC also endorsed these customary and traditional practices for Federal lands in Units 21 and 24, emphasizing the need for artificial light as a safety measure.

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**PROPOSAL 6**

EFFECT OF THE PROPOSAL: Classify black bears as furbearers and establish a trapping season in Units 12, 20, and 25.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The department does not support trapping of black bears outside of predation control areas. Black bear trapping is a controversial method of take that should be applied only in predator control areas where implementation plans have been adopted by the board. These plans require thorough analysis of predator and prey populations and harvest, and assure that predators will be maintained as part of the ecosystem. Also, the units addressed in this proposal already have substantial opportunity take black bears, with a year-round season, a 3-bear bag limit a lengthy spring baiting season and in some areas, a fall baiting season.

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**PROPOSAL 7**

EFFECT OF THE PROPOSAL: Begin the black bear baiting season earlier in Units 12, 19, 20, 21, 24, and 25.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: Beginning the black bear baiting season 2 to 3 weeks earlier is not likely to have a measurable biological effect on black bear populations in these units. However, allowing hunters to set out bait several weeks before hunters are expected to use the bait stations is likely to invite opposition to bear baiting, endangering this practical method of hunting black bears in these Game Management Units.

The use of bait stations to harvest black bears has been extremely controversial. Public ballot initiatives to prohibit this practice have occurred in the past, and the department believes that lengthening the baiting season to include several weeks prior to emergence of black bears is likely to exacerbate public opposition, possibly resulting in the loss of baiting.

Although the prohibition on feeding game (5AAC 92.230) specifically exempts permitted black bear bait stations, lengthening the baiting season to include a long period of time when black bears are not present likely violates the intent of this regulation. Generally, black bears in Interior Alaska emerge from dens beginning in early May, although some bears may be seen earlier.

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**PROPOSAL 8**

EFFECT OF THE PROPOSAL: Allow guides and assistant guides to place and maintain black bait stations on behalf of clients in Units 12, 19, 20, 21, and 25.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 9.

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**PROPOSAL 9**

EFFECT OF THE PROPOSAL: Allow guides and assistant guides to maintain up to 10 black bear bait stations in Units 12, 19, 20, 21, and 25.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The department does not have biological concerns at this time regarding allocation of 10 bait stations to guides (proposal 9) or allowing guides to bait and maintain clients' bait stations (proposal 8).

Compared with proposal 8, we believe proposal 9 would be easier for guided hunters to understand and would be unambiguous to enforce, as it would not introduce confusion regarding responsibility for registering, maintaining, and removing bait stations.

Currently, the only difference between bait stations registered by guides and those registered by other hunters is that guides may be paid for use of their bait stations. Under current regulations, the person who registers a bait station must be the person who places the bait at the site. In addition, the registrant is responsible for making sure that bait stations are cleaned up by the end of the season. Therefore, the board may wish to consider the ability of one person to maintain and clean up more than 2 bait stations.

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**PROPOSAL 10**

EFFECT OF THE PROPOSAL: Allow black bear hunters in Unit 20 the option of salvaging the hide or meat or both during June 1–December 31.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation and social issue that should be determined by the board. This proposal may offer hunters more flexibility in deciding whether to take black bears if they do not wish to salvage hides, especially poor-quality summer hides. However, some people believe all black bear hides are trophies, and should, therefore, be salvaged.

Current regulations require black bear hunters to salvage the hide, skull, and edible meat of black bears harvested during January 1–May 31 and to salvage only the hide and skull during June 1–December 31. During June 1–December 31 of 2005–2009, 968 bears were killed by hunters in Unit 20 (average = 194 per year). Hunters voluntarily kept the meat of 83% of these bears and 62% of hunters kept more than 50% of this meat. This indicates a preference by hunters in Unit 20 to salvage meat of bears taken during this time period. We believe that allowing hunters the option to salvage the meat instead of the hide during June 1–December 31 is not likely to measurably affect harvest, as hunters harvest black bears for a wide variety of reasons.

The original intent of the regulation was to allow hunters to leave bad-tasting meat of bears that ate fish and to salvage the hide, which is considered a trophy. Black bears in Unit 20 generally do not consume large quantities of fish; therefore people are likely to find the meat palatable at all times of the year. Beginning in September, hides of Unit 20 black bears are likely to be full and not rubbed, although the fur is generally shorter than that of bears taken during spring hunts. Hides of bears taken during June, July, and August are likely to be poor quality even though the meat is good quality.

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**PROPOSAL 11**

EFFECT OF THE PROPOSAL: Eliminate black bear sealing requirement in Units where harvest tickets or registration permits are required.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 12**

EFFECT OF THE PROPOSAL: Exempt resident hunter brown bear tag fees in all Interior region Game Management Units.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 13**

EFFECT OF THE PROPOSAL: Modify seasons and bag limits, and apply motorized restrictions for the Fortymile Caribou Herd in Units 20B, 20D, 20E, and 25C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for department proposal 14.

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**PROPOSAL 14**

EFFECT OF THE PROPOSAL: Modify Fortymile Caribou Herd fall hunt (RC860) season dates, bag limit, and hunt conditions for the Fortymile Caribou Herd in Units 20B, 20D, 20E, and 25C.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: The department recommends that proposed changes to resident season length, resident bag limit, temporary closures, and weapons restrictions be adopted using department discretionary permit authority, rather than through board regulatory action. Given the proposed continuation of nonresident hunting opportunities, the board may wish to amend the nonresident season after consideration of whether the proposed Alaska resident hunting restrictions (season, bag limit, temporary closures, weapons restrictions,) still provide a reasonable opportunity for subsistence uses.

The Fortymile registration permit hunt is a joint state–federal hunt. This proposal was formulated by a joint coalition of 5 advisory committees and the Eastern Interior Regional Advisory Council, working with state and federal agency staffs. The proposal is based upon the 2006–2012 Fortymile Caribou Herd Harvest Plan, which was endorsed by the Board of Game and the

Federal Subsistence Board.

During recent years, the department has been unable to adequately control fall harvest. This problem became critical during fall 2009 when the fall and winter hunt quotas were taken in 3 days along the Taylor and Steese Highways because of heavy hunting pressure. In addition, excessive roadside harvest and short fall hunts along the highways has resulted in hunting conditions contrary to the Harvest Plan. The proposed changes are expected to help restore harvest control and improve hunt conditions.

Using discretionary permit authority may again be necessary prior to the next Interior board meeting because proposed changes may not be entirely effective in restoring control of the harvest in this dynamic management situation. Also, changes may be needed as a result of future Federal Subsistence Board actions in order to continue with a joint state-federal hunt.

See proposal 14 issue statement for additional information.

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**PROPOSAL 15**

EFFECT OF THE PROPOSAL: Reduce the Fortymile Caribou Herd population objective to 45,000 to 75,000 caribou.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: Current management efforts (harvest management and predator control) for the Fortymile Caribou Herd (FCH) are designed to promote herd growth toward the Intensive Management Population Objective of 50,000 – 100,000. Nutritional monitoring of the FCH does not currently indicate a declining trend in herd condition.

The nutritional health of the Fortymile Caribou Herd is currently monitored by the department through spring parturition surveys and fall calf weights. Although the department observed low birth rates (70% of cows  $\geq$  3-years of age) in May of 2009, and below average (11% below 1990–2007 average weight) calf weights in fall of 2008 and 2009, similar observations were made in other caribou herds in interior Alaska and Yukon during this period and have been attributed primarily to summer weather anomalies in 2008 and 2009 and harsh winter conditions during the 2008-2009 winter.

Management of the Fortymile Caribou Herd is guided by the 2006–2012 Fortymile Caribou Herd Harvest Plan, which was developed by representatives from the Central, Delta Junction, Eagle, Fairbanks and Upper Tanana/Fortymile Advisory Committees, and the Eastern Interior Regional Advisory Council, with input from the Yukon Fish and Wildlife Management Board, the Yukon Department of Environment and Yukon First Nations. The plan was developed to guide herd harvest during regulatory years 2006 – 2012, with a primary goal of herd growth. The Board of Game and the Federal Subsistence Board endorsed the plan in 2006. The department supports continuation of the management direction recommended by this plan.

In addition to current nutritional monitoring of the FCH, additional funding has been requested

to increase efforts beginning in 2010. This information will allow ADF&G to more accurately assess current herd health compared to the 1990s when herd size was substantially lower (47 – 72% of the current population size). The herd harvest plan will be revised prior to the 2012 Interior board meeting and will include a review of the FCH population objectives related to nutritional condition of the herd.

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**PROPOSAL 16**

EFFECT OF THE PROPOSAL: Earlier resident and later nonresident seasons for hunting Dall sheep in Region III.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be decided by the board. This proposal appears to address only general season hunts with season dates of August 10–September 20. Providing a longer resident general season is used to separate resident and nonresident hunters in many areas, and this proposal might alleviate some conflicts between users. It is not clear whether this proposal is meant to also apply to drawing hunts. Nevertheless, it is less likely to impact the Delta Controlled Use Area and the Tok Management Area where the number of hunters is controlled by the number of permits.

Subsistence sheep hunts in the Interior typically have more liberal seasons and bag limits than those proposed, which suggests the proponent is concerned specifically with general sheep hunting seasons. . If the proposed season was adopted for subsistence hunts, the board would need to determine whether the reduced season would still provide a reasonable opportunity for subsistence uses.

If applied to general season and drawing hunts only, this proposal is not likely to adversely affect sheep populations, even if general season harvest increases in the short-term. The general season bag limit of full curl rams will prevent overharvest. However, this proposal would create 2 different general seasons in the state. Most of the state has a general sheep season of August 10–September 20.

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**PROPOSAL 17**

EFFECT OF THE PROPOSAL: Eliminate the November portion of the lynx trapping season in Units 12 and 20E and extend the closing date from March 15 to March 31.

DEPARTMENT RECOMMENDATION: **ELIMINATE NOVEMBER SEASON–NO RECOMMENDATION**  
**EXTEND CLOSING DATE TO MARCH 31–DO NOT ADOPT**

RATIONALE: The department has no recommendation concerning closure of the November portion of the lynx trapping season. Lynx are an economically important furbearer in Units 12 and 20E, but pelt quality is poor during November. The November season, with a bag limit of 5

lynx, was put in place to allow trappers to retain these high-value furs caught accidentally while targeting other species. This is not a biological issue, however, the Alaska Wildlife Trooper (AWT) in Tok and department staff has observed that some trappers specifically target lynx as early as November 1, primarily along the Alaska, Glenn, and Taylor Highways. Area trappers have also indicated to AWT and department staff that some trappers exceed the 5-lynx limit and illegally report harvesting these lynx in December. However, harvest data from winters 2005–2006 through 2008–2009 show only 2 trappers took more than 5 lynx in November

The department does not recommend extending the end of the lynx season from March 15 to March 31. Although this would increase trapping opportunity, fur quality of most lynx caught after March 15 is generally poor. In addition, snowshoe hare numbers are declining, and the low in the lynx–hare cycle is expected to occur in the next 2–3 years. Extending the trapping season to March 31 could slow recovery from a low in the lynx population cycle.

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### **PROPOSAL 18**

EFFECT OF THE PROPOSAL: Establishes a joint federal–state drawing permit hunt for the Chisana caribou herd, starting in fall 2011.

DEPARTMENT RECOMMENDATION: **Adopt**

RATIONALE: Population parameters indicate that a limited harvest of Chisana caribou is sustainable. This proposal adheres to recommendations in the draft Chisana Caribou Herd Management Plan prepared by Yukon Department of Environment, White River First Nation, Canadian Wildlife Service, US National Park Service (Wrangell St. Elias), US Fish and Wildlife Service and ADF&G. This plan sets guidelines for opening a limited hunt on the herd while protecting these caribou from overharvest.

The plan recommends a 2% bulls-only harvest split evenly between Alaska and Yukon, to be based on the results of a 2010 census and composition survey. Harvest will occur only if 1) the population trend remains stable or increasing, 2) the bull:cow ratio does not fall below 35 bulls:100 cows, and 3) the 3-year average fall calf:cow ratio remains at or above 15 calves:100 cows.

The earliest possible hunting season for Chisana caribou would be during fall 2011. Based on the latest population estimate (733 caribou in 2007) the total combined state and federal Alaska quota would be 7–8 caribou annually. Because of the small quota, a drawing hunt is the only reasonable management option to ensure the quota is not exceeded. However, prior to opening this hunt, the board will need to consider the 8 criteria in 5AAC 99.010 to determine whether the herd is associated with customary and traditional uses, and if so, establish regulations that provide a reasonable opportunity for subsistence

Based on data from the 1980s and early 1990s, average annual harvest was 29 Chisana caribou, with approximately 60% taken by Alaska residents. Following a population decline in the early 1990s, hunting in Alaska and Canada was stopped by 1994. Between 2003 and 2006, the Yukon Department of Environment carried out a successful captive rearing program to increased calf

recruitment. Between fall 2003 and 2007, the Chisana population trend remained stable (706–733), with an average fall composition of 21 calves:100 cows and 42 bulls:100 cows. During 2003–2008, bull:cow ratios and calf recruitment appeared adequate to support a limited bull harvest. No census was conducted in 2008 or 2009. In 2008 the herd composition remained stable with 21 calves:100 cows and 44 bulls:100 cows. In the 2009 composition count, we observed 15 calves:100 cows and 48 bulls:100 cows.

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**PROPOSAL 19**

EFFECT OF THE PROPOSAL: Establish a fall Fortymile Caribou registration hunt in Unit 20E for youth hunters and individuals with disabilities.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The department supports changes to the Fortymile fall hunt as described in proposal 14 to address specific hunt issues that have developed in recent years (also see analysis and recommendation for proposal 14). Changes recommended in proposal 14 will allow opportunity for youth and disabled hunters to hunt Fortymile caribou under a registration permit in the fall. These changes, if successful, will lead to more opportunity than in the recent past for youth and disabled hunters to pursue Fortymile caribou. As in all big game hunts, hunters at least 10 years old will be able to obtain registration permits for this hunt.

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**PROPOSAL 20**

EFFECT OF THE PROPOSAL: Increase the harvest quota for the Fortymile Caribou Herd to 7–10% of the herd annually, in Unit 20E, to stop herd growth.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for department proposal 15.

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**PROPOSAL 21**

EFFECT OF THE PROPOSAL: Modify Fortymile Caribou Registration Hunt in Unit 20E.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for department proposal 14.

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**PROPOSAL 22**

EFFECT OF THE PROPOSAL: Extends moose season on private land (Tetlin village corporation) in Unit 12 for both resident and nonresident hunters.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. Current hunting seasons, bag limits, and related regulations in Alaska are not configured to private land boundaries. Although this approach to hunting regulations is used in other states, it is only a concept that the department currently is exploring. Because this approach to seasons and bag limits would constitute a substantial departure from established regulatory practices, the department recommends the establishment of basic management and regulatory guidelines before promulgating regulations such as this proposal. The department would prefer to wait until a cooperative management plan is developed with the village and the participating concession holder (proposer of this change).

There may be an additional harvest opportunity for moose on the southern portion of the 741,000 acre Tetlin tribal land holding. The bull:cow ratio in the southern part of this area is relatively high. However, the northern portion is adjacent to non-private lands where the bull:cow ratio is at the desired level, and where additional bull harvest could precipitate the need for more restrictive regulations for harvesting bulls, such as antler restrictions. Also, additional information on moose movements may be necessary to determine if additional hunting opportunity provided on Tetlin land could reduce opportunity on adjacent land.

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**PROPOSAL 23**

EFFECT OF THE PROPOSAL: Reduce the number of Tok Management Area Dall sheep drawing permits from 100 to 80 to increase the number of rams with horns  $\geq 40$  inches.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: The department intends to implement the proposed change to the number of Dall sheep drawing permits in the Tok Management Area (TMA) using discretionary permit authority. Therefore, we recommend the Board take no regulatory action on this proposal.

The TMA is managed specifically to provide hunters with the opportunity to harvest large-horned, trophy rams under uncrowded conditions. One of the management objectives is to maintain a harvest of 7–10% of rams with horns  $\geq 40$  inches in length. However, for the past 3 years, only 5% of the rams harvested have had horns over 40 inches. Reducing the number of permits from 100 to 80, using department discretionary authority, will likely reduce harvest, allow more rams to reach 40 inches, and allow the harvest objective to be achieved.

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**PROPOSAL 24**

EFFECT OF THE PROPOSAL: Eliminate nonresident hunting for moose and caribou within the Upper Yukon–Tanana Predator Control Area.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. Alaska Statute (AS) 16.05.258 specifies allocation procedures regarding game populations for which the Board

made positive customary and traditional use determinations. This statute requires the Board to adopt regulations that eliminate consumptive uses other than subsistence (AS 16.05.258(b)(3)) in order to provide a reasonable opportunity for subsistence uses when the harvestable portion of the population is insufficient to provide for subsistence and non-subsistence uses. When the harvestable surplus of a population falls above an amount reasonably necessary for subsistence (ANS) range, then no elimination of nonsubsistence uses is required by law. When the harvestable surplus falls within an ANS range, such that there is only sufficient harvestable surplus to provide for subsistence uses, then nonsubsistence uses, including non-resident uses are to be eliminated.

The Upper Yukon–Tanana Predator Control Area (control area) was established to benefit the moose population in Unit 20E and in Unit 12 north of the Alaska Highway and the Fortymile caribou herd (FCH) in Unit 20E and portions of Units 12, 20B, 20D and 25C. Within the control area, moose and caribou populations have increased, harvest has been within sustainable levels, and Alaskan resident harvests have exceeded the amounts reasonably necessary for subsistence uses. The fall 2009 moose population was estimated at 4,700–6,600 moose, an increase from the 2004 estimate of 2,600–4,300 moose prior to predation control. The harvestable surplus of moose was 156–224 during 2002–2009. The amount necessary for subsistence in all of Unit 12 is 60–70 and for all of Unit 20E is 50–75. During the summer 2009 FCH census, 46,509 caribou were photographed, up from the last successful census in 2007, when 38,364 were photographed. The Fortymile Caribou Herd Harvest Plan (2006–2012) was endorsed by the board, and stated that providing nonresident harvest opportunity is important to Alaskan guiding and transporting industries. Under the plan, harvest of the FCH is restricted to 3% (2% for Alaskans) of the population. This is below the level that would adversely impact population growth. There is also a provision to allow up to a 15% harvest over the 3% annual quota, to provide management flexibility. The amount reasonably necessary for subsistence determination for the FCH is 350–400 caribou. Annual FCH harvest averaged 851 caribou during 2002–2007 and was 912 in 2008 and 1,080 in 2009. The total annual harvest did not exceed the upper limit of the FCH harvestable surplus (3% of the herd annually, range 1,150–1,400).

During recent years, fall and winter FCH seasons have increasingly been closed by emergency order after only a few days of hunting due to increasing hunting pressure and accessibility of the herd from the Taylor and Steese Highways. The board may wish to reconsider whether or not reasonable opportunity currently exists for subsistence hunters (see proposal 14 for additional information).

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## **PROPOSAL 25**

EFFECT OF THE PROPOSAL: Changes the description of the Ladue Controlled Use Area in Unit 20E.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The department has no biological concerns with this proposal to change the current Ladue Controlled Use Area to exclude the network of mining trails in the northern portion. An estimated 51

bull:100 cows, above the Unit 20E management objective of 40 bull:100 cows, were observed during the fall 2009 moose survey in the Tok Central Moose Survey area adjacent to the proposed exclusion area. Harvest in the proposed exclusion area during fall 2003–2007, when travel on existing trails was legal, averaged 2 bulls annually. Harvest remained stable during the first 2 years following the restriction of motorized travel on these trails, with an average of 2 bulls harvested annually during fall 2008 and 2009. Harvest is not expected to change if this proposal is adopted.

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**PROPOSAL 26**

EFFECT OF THE PROPOSAL: Shorten the beaver trapping season in Unit 20B.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: In 2006 the department liberalized and aligned beaver trapping seasons throughout Unit 20. In general, beaver populations are high and harvest is low. Prices of beaver hides have been low for many years and most trappers do not target large quantities of beavers. Since 2006, harvest has likely increased in easily accessible areas, but we have no information to indicate an overharvest is occurring. We would like to maintain high harvest along the Unit 20B road system and more populated areas to reduce beaver damage and subsequently the take of beavers under special nuisance permits. Adequate refugia of lightly-trapped areas is available away from accessible areas as a source of dispersing beavers, which would lessen potential overharvest.

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**PROPOSAL 27**

EFFECT OF THE PROPOSAL: Lengthen the brown bear hunting season in Unit 20A

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 31.

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**PROPOSAL 28**

EFFECT OF THE PROPOSAL: Allow the taking of brown bears over bait in Unit 20.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The department does not support baiting of brown bears outside of active predator control areas. Brown bear baiting is a controversial method of take that should be applied only in predator control areas where implementation plans have been adopted by the Board. These plans require thorough analysis of predator and prey populations and harvest, and assure that predators will be maintained as part of the ecosystem.

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**PROPOSAL 29**

EFFECT OF THE PROPOSAL: Allow the taking of brown bear over bait and extend the hunting season in Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See rationale for proposal 28.

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**PROPOSAL 30**

EFFECT OF THE PROPOSAL: Allow the taking of brown bear over bait and extend the hunting season in Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See rationale for proposal 28.

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**PROPOSAL 31**

EFFECT OF THE PROPOSAL: Lengthen the brown bear season dates for Units 20C and 20A.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: For Unit 20C the department recommends adopting the August 10–June 30 option presented. This is consistent with adjacent Unit 19D to the west and Unit 20F to the north. These units all have relatively poor access. Grizzly bear harvest in Unit 20C is low and additional harvest opportunity can be supported.

For Unit 20A the department recommends adopting September 1–May 31. This is consistent with adjacent Unit 20B which also has relatively good hunter access. This would also align the opening of the grizzly bear season with that of the general moose season. The department recommends cautious liberalization of the season in Unit 20A as harvest has increased substantially in the last 3–4 years and exceeds estimated sustainable harvest rates. However, sustainable harvest rates are based on population estimates from the 1990s which may not be applicable today. Also, we have detected no changes in sex and age composition or skull size of harvested bears that would suggest the population is being overharvested.

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**PROPOSAL 32**

EFFECT OF THE PROPOSAL: Modify antler restrictions for moose in Unit 20A

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The board has identified Unit 20A as an intensive management (IM) area for moose. As such, the current harvest strategy is designed to meet the IM mandate for elevated yield through a combination of general season (spike–fork or 50-inch or 3 or 4 brow tines), drawing (“any bull” and antlerless) and winter registration (antlerless) hunts. This strategy has

been effective at optimizing harvest and in distributing hunters across the unit. The management objective for Unit 20A is 30 bulls:100 cows. Moose surveys in 2009 resulted in an estimated bull:cow ratio of 32 bulls:100 cows, indicating the current strategy, including antler restrictions, is effective. In addition, a 36-inch, 2 brow tine restriction would be inconsistent with the statewide 50-inch, 3 or 4 brow tine regulation.

In Unit 20A, spike–fork yearling bulls make up a small portion of the bull harvest and only a small percentage of the yearling bull population is harvested annually. Approximately 50% of the yearling bull population (i.e., paddle bulls) is protected under the current spike–fork, 50-inch regulation. Thus, there is sufficient recruitment of yearling bulls into the 2-year-old age class, which is evidenced by strong post-hunt yearling bull:cow ratios (average =10:100) and high bull:cow ratios.

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**PROPOSAL 33**

EFFECT OF THE PROPOSAL: Allow take of moose calves and cows accompanied by calves in antlerless moose hunts in Unit 20

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: The department recommends the board amend this proposal so that the taking of calves and cows accompanied by calves is limited to Intensive Management areas of Units 20A and 20B where liberal antlerless harvests are being conducted to meet management objectives. Including a high proportion of calves in the harvest is an integral component of managing for elevated yield as mandated in Intensive Management legislation. A relatively high proportion of calves in the harvest not only increases yield, but also is less likely to result in overharvest, especially when compared to the take of adult cows. According to the Alaska Wildlife Troopers, the current prohibition on the take of calves is unenforceable as there is overlap in the size of calf and yearling moose. Also, many hunters cannot differentiate between calves and yearlings and cannot reliably identify calves, especially when calves are separated from adult animals by sufficient distance that size comparisons cannot be made. Furthermore, prohibiting the take of calves in antlerless hunts creates regulatory inconsistencies and confusion. For example, in most portions of Unit 20B, it is illegal to take a calf in an antlerless hunt, but legal to take a male calf in the general hunt. The primary argument against the take of calves and cow accompanied by calves is one of ethics or human values, opinions that the department respects, but takes no position.

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**PROPOSAL 34**

EFFECT OF THE PROPOSAL: Add a registration hunt for bull moose when bull:cow ratios exceed management objectives.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The current management strategy has been effective in meeting moose population management objectives and maximizing hunting opportunity. In 2009, bull:cow ratios

were estimated at 32 bulls:100 cows (management objective 30 bulls:100 cows). Current harvest rate of bulls of 4–5% of the prehunt moose population is at upper limit of sustainability. A 25 day spike–fork 50-inch or 3 or 4 brow tine general season, 25 day “any bull” drawing permit hunt, 65 day “antlerless” drawing permit hunt, and 50 day “antlerless” winter registration hunt provide high levels of hunting opportunity.

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**PROPOSAL 35**

EFFECT OF THE PROPOSAL: Modify antler restrictions in Unit 20A

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The current management strategy has been effective in meeting moose population management objectives and maximizing hunting opportunity. In 2009, bull:cow ratios were estimated at 32 bulls:100 cows (management objective 30 bulls:100 cows). A 25 day spike–fork 50” 3 or 4 brow tine general season and 25 day “any bull” drawing permit hunt provides substantial hunting opportunity. Any surplus of bull moose above the management objective of 30 bulls:100 cows can be adjusted by issuing additional “any bull” permits. Adoption of this proposal may result in increased harvest of bull moose in the Ferry Trail Management Area above sustainable limits based on the history of spike-fork 50” 3 and 4 brow tine regulation in that area.

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**PROPOSAL 36**

EFFECT OF THE PROPOSAL: Require nonresidents moose hunters in Unit 20A to hunt with a guide or resident relative of second degree kindred.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: This proposal would require a change in statute, and the board does not have the authority to change statutes.

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**PROPOSAL 37**

EFFECT OF THE PROPOSAL: Change the muzzleloader moose season and antler restrictions for Unit 20A.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 39.

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**PROPOSAL 38**

EFFECT OF THE PROPOSAL: Modify the moose antler restrictions for Unit 20A “any bull” drawing hunts.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The current management strategy has been effective in meeting moose population management objectives and maximizing hunting opportunity. In 2009, bull:cow ratios were estimated at 32 bulls:100 cows (management objective 30 bulls:100 cows). Contrary to the author's claim, general season bull moose harvest under the spike-fork, 50-inch regulation has not been declining. Adoption of this regulation would further complicate the moose hunting regulations in Unit 20A in that 2 (DM768 and DM770) of the 7 drawing hunt areas for "any bull" moose would have different regulations. Moreover, the combined effect of more complicated (i.e., "any bull" hunters would have to be more selective) and restrictive regulations (i.e., recipients of "any bull" permits may not hunt a bull under the general season regulations) would likely result in an overall decline in the harvest of bull moose in Unit 20A.

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**PROPOSAL 39**

EFFECT OF THE PROPOSAL: Close the muzzleloader hunt in Unit 20A; open a similar muzzleloader hunt in Unit 20B.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation and user conflict issue that should be determined by the board. The current late season muzzleloader hunt (DM766, 1-30 November, in a portion of the Wood River Controlled Use Area in Unit 20A) is a small-scale, special weapons hunt with an average annual harvest of < 15 bull moose that began in 1996. Conflicts between hunters, trappers (i.e., primarily a single wolf trapper in the area), and local residents have been reported. Although it would be difficult to find an area comparable to this hunt area in terms of access, terrain, habitat, and moose population characteristics, there are areas in Unit 20B that could serve as a substitute and sustain such a hunt (see also analysis and recommendation for proposal 48)

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**PROPOSAL 40**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose hunting season in Unit 20A.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 41**

EFFECT OF THE PROPOSAL: Lengthen the FMA muzzleloader season to October 1–November 30.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This proposal is an allocation issue that should be decided by the board. Significant social issues that should be addressed are included below.

The department uses several hunts within the urban Fairbanks Management Area (FMA), which includes Creamer's Refuge, as tools to reduce roadkill, reduce nuisance moose problems, and increase hunting opportunity. Public acceptance of moose hunting in this urban area is critical to the future of the hunts. In addition to a 7-day muzzleloading season on Creamer's Refuge, a drawing archery hunt for antlerless moose and a general season archery hunt for bull moose occur within the FMA. Most of the moose taken in this urban area are taken by archery and roadkill.

Expanding the muzzleloader hunt into the FMA or lengthening the muzzleloading hunt may not be acceptable to surrounding home and business owners or the recreating public. Creamer's Refuge is completely surrounded by Fairbanks residential and business areas and is used by thousands of non-hunting outdoor recreationists every year. Archery has proven to be a publicly acceptable method of moose take within the FMA for the last 20 years, while the local public has frequently requested that large caliber firearms not be used to take large animals around their homes and businesses.

Opportunity for muzzleloading hunters to harvest moose between August 15 and February 28 in the rest of Unit 20 is at an all-time historical high. Muzzleloading rifles can be used during any hunt in which rifles are allowed.

An alternative to this proposal may be to amend the hunt dates to December 1–January 31. This would separate archers from muzzleloaders, provide a much longer season, put muzzleloading hunters in the field during the time of year when Creamer's Refuge has the least number of other users, and focus the harvest during the period of the highest road kill rate.

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**PROPOSAL 42**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose hunting seasons in Unit 20B

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement

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**PROPOSAL 43**

EFFECT OF THE PROPOSAL: Allocate a number of the antlerless moose drawing permits in 20B to youth hunters.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This proposal is an allocation issue that should be decided by the board. Hunters at least 10 years old can obtain drawing permits. Also, hunters 17 and younger who have successfully completed a hunter education class, may hunt under the direct and immediate supervision of an adult permit holder. The permit holder must be a licensed hunter, 16 or older, and is responsible for ensuring all legal requirements are met. With 81 different moose drawing permit hunts in 20A, 20B, and 20D, several registration permits, and a long general season, there is ample opportunity for youth to hunt moose. Moose hunting opportunity in Unit 20B is at an

all-time historical high. Additionally, there are no hunter age restrictions for hunting small game, which provide year-round opportunities for youth.

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**PROPOSAL 44**

EFFECT OF THE PROPOSAL: Eliminate the antlerless moose drawing hunts near Manley Hot Springs in 20B.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See issue statement for department proposal 42. The antlerless moose harvest in this area is designed to curb growth of this population that has surpassed the upper limit of the board’s Intensive Management (IM) population objective of 12,000–15,000 moose and helps to meet IM harvest objectives.

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**PROPOSAL 45**

EFFECT OF THE PROPOSAL: Restrict the use of wheeled or tracked vehicles for hunting moose in Minto Flats Management Area.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: We recommend the following amended language: Aircraft, airboats, *and all wheeled or tracked motorized vehicles, except snowmachines*, may not be used for moose hunting or to transport moose, moose hunters or moose hunting equipment within the Minto Flats Management Area.

Minto Flats Management Area is an extremely important wildlife habitat area. The importance and quality of the outdoor experience there was recognized by hunters, and in 1988 the State set aside 500,000 acres to create the Minto Flats State Game Refuge to ensure the protection and enhancement of habitat, the conservation of fish and wildlife, and to guarantee the continuation of hunting, fishing, and trapping there. The boundary of the State Game refuge is based on township and section lines not recognizable in the field. The Management Area lies mostly within the Game refuge, and its boundary is based on landscape features so that hunters, trappers, fishermen, and enforcement can recognize the boundary in the field.

Aircraft and airboats are already illegal to use for moose hunting in the Management Area because of conflicts between user groups in the past. Wheeled and tracked land vehicles are already illegal on the Game Refuge for all purposes during snow free periods, except on private inholdings within the Refuge and designated trails.

In recent years complaints from Minto flats hunters concerning illegal ATV use in Minto flats have increased. Alaska Wildlife Troopers have been disinclined to enforce the ATV ban in the refuge because of the lack of public notice (the refuge regulation is not in the hunting regulation booklet). Adopting this proposal would provide sufficient public notice and make it easier for enforcement to prosecute cases against illegal ATV use in Minto Flats.

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**PROPOSAL 46**

EFFECT OF THE PROPOSAL: Provide one any-moose permit per household for the residents of the village of Minto

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. Currently in Minto Flats there is a general antler-restricted bull moose season during September 11–25. There are also fall and winter limited registration hunts for any moose with permits distributed from Minto, Nenana, and Fairbanks on a first come first serve basis. In recent years some hunters have maintained their place in line for 48 hours or more, sometimes at -40F

In 1992, the board established the amount reasonably necessary for subsistence (ANS) at 20-40 moose based upon customary and traditional use patterns of Minto and Nenana residents in the 1980s. From 1985 to 2003, Tier II permits were issued in Minto Flats for the fall and winter hunts for any bull (1985-1995) and any moose (1995-2004). In 2004, with an average Tier II harvest of 55 moose, the board changed the hunt from Tier II to a limited registration permit hunt due to recent Tier II harvest patterns and the fact that the harvestable surplus exceeded the ANS.

Subsistence Division research for the 12-month period from April 2004 to March 2005 documented an estimated 42 moose harvested by residents of Minto and an estimated 62 moose harvested by residents of Nenana.

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**PROPOSAL 47**

EFFECT OF THE PROPOSAL: Lengthen the muzzleloader season in the Fairbanks Management Area of Unit 20B to November 1–30

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 41.

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**PROPOSAL 48**

EFFECT OF THE PROPOSAL: Open a muzzleloader hunt in the upper Chena and/or Salcha rivers.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: The department recommends amending this proposal to create a resident-only drawing permit hunt for any moose by muzzleloader only during November 1–30 in the drainage of the Middle Fork of the Chena River and the drainage of the Salcha River upstream from Goose Creek. Up to 60 permits would be issued.

Additional moose hunting opportunity is warranted. An average of 30 moose were taken from this area during 2004–2008 by an average of 88 hunters, including about 2.4 moose per year during a September 21–30 archery-only hunt. Average harvest of about 800 moose per year in Unit 20B meets the intensive management harvest objective of 600 to 1500 moose. However, harvest has failed to stop the growth of this moose population. The moose population objective in Unit 20B is 12,000 to 15,000 moose, but the 2009 population estimate was about 20,200.

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**PROPOSAL 49**

EFFECT OF THE PROPOSAL: Establish an archery-only hunt in Unit 20B along the Richardson Highway

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: We recommend this proposal be amended to establish a resident-only drawing permit hunt for any moose by bow and arrow only during September 16–February 28 in Unit 20B southeast of the Moose Creek dike within ½ mile of each side of the Richardson highway. Up to 100 permits would be issued.

A September 16–February 28 season would allow harvest of some moose that might otherwise be killed in moose–vehicle collisions. Two peaks in road kill occur in Unit 20B: September and December–January. A September 16 start date will preclude conflict with general season moose hunters and a February 28 closing date directs harvest to the December–January peak in road kills and coincides with the standard closing date for Unit 20 winter moose hunts.

The harvestable surplus of moose in Unit 20B is adequate to support additional harvest. Average harvest of about 800 moose per year in Unit 20B meets the intensive management harvest objective of 600 to 1500 moose. However, harvest has failed to stop the growth of this moose population. The moose population objective in Unit 20B is 12,000 to 15,000 moose, but the 2009 population estimate was about 20,200.

This portion of the Richardson Highway continues to be a source for relatively high numbers of moose–vehicle collisions, as identified by a 1988–1992 Alaska Department of Transportation and Public Facilities study. Much of the reason for the high collision rate is the migratory nature of many moose that encounter the Richardson Highway. At the end of the summer feeding season, many moose move from the Tanana Flats south of the Richardson highway to their rutting area in the hills north of the Richardson highway. By spring they re-cross the highway to feed in the Tanana Flats.

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**PROPOSAL 50**

EFFECT OF THE PROPOSAL: Delay the resident moose hunting season dates in Unit 20C by 5 days.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: Delaying the resident moose hunting season from September 1–20 to September 5–25 is likely to increase harvest, as bulls become more susceptible to harvest during the rut. This will likely lower the bull:cow ratio below the management objective of 30 bulls:100 cows. The Unit 20C moose population is currently meeting this objective, indicating that the 10-year average annual resident and nonresident harvest of 124 bulls (range = 92–140) is appropriate.

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**PROPOSAL 51**

EFFECT OF THE PROPOSAL: Delay the moose season in Unit 20C by 5 days.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 50

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**PROPOSAL 52**

EFFECT OF THE PROPOSAL: Lengthen the nonresident moose season in Unit 20C by 10 days.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: Expanding the moose season in Unit 20C for nonresidents would increase the bull harvest . This will likely lower the bull:cow ratio below the management objective of 30 bulls:100 cows. The Unit 20C moose population is currently meeting this objective, indicating that the 10-year average annual residents and nonresidents harvest of 124 bulls (range = 92–140) is appropriate.

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**PROPOSAL 53**

EFFECT OF THE PROPOSAL: Remove the prohibition against shooting white moose in Unit 20C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff Proposal — see issue statement

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**PROPOSAL 54**

EFFECT OF THE PROPOSAL: Expand the muzzleloader-only hunt on Creamer’s Refuge to all of the Fairbanks Management Area.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 41.

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**PROPOSAL 55**

EFFECT OF THE PROPOSAL: Expand the Stampede Closed Area in Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 56**

EFFECT OF THE PROPOSAL: Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 57**

EFFECT OF THE PROPOSAL: Eliminate the Nenana Canyon Closed Area in Units 20A and 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 58**

EFFECT OF THE PROPOSAL: Expand the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 59**

EFFECT OF THE PROPOSAL: Expand the Nenana Canyon Closed Area in Units 20A and 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 60**

EFFECT OF THE PROPOSAL: Expand the Stampede Closed Area in Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 61**

EFFECT OF THE PROPOSAL: Eliminate the Stampede Closed Area in Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 62**

EFFECT OF THE PROPOSAL: Establish a wolf predation control area implementation plan for Unit 20C.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The Department recommends not implementing a predation control plan at this time in Unit 20C. Instead, management actions are being taken to develop an intensive management plan that will describe data gaps, identify funding sources, and develop a schedule of activities that must be integrated into ongoing intensive management activities in other portions of the Fairbanks management area. The first funding increment for 20C is anticipated in fiscal year 2011 (July 2010 – June 2011). This will be supplemented in the next few years with funding reallocated from existing intensive management areas (such as 20A) when information needs from these areas start to taper off.

This incremental approach to developing an intensive management plan for 20C will also allow time to resolve lingering doubt and opposition on the part of some advisory committees and some members of the public concerning the harvest of cows and calves, crucial to sustaining elevated levels of harvest of moose in neighboring 20A and 20B.

The average harvest of moose in Unit 20C has been 131 for the past 5 years. The intensive management harvest objective is 150-400. The intensive management population objective is 3,000-4,000. Although there is no current population estimate for moose in 20C, limited survey data, incidental observations, and anecdotal information suggest that there is no loss of productivity in the moose population. Additionally, recent fires have set the stage for successional growth of vegetation advantageous for moose.

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**PROPOSAL 63**

EFFECT OF THE PROPOSAL: Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 64**

EFFECT OF THE PROPOSAL: Open the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 65.

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**PROPOSAL 65**

EFFECT OF THE PROPOSAL: Prohibit the taking of wolves in a portion of Unit 20C by expanding the Stampede Closed Area adjacent to Denali National Park and Preserve.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The intent of this proposal is to eliminate the take of wolves by hunters and trappers in the Stampede area to prevent a potential decrease in wolf numbers, alteration of wolf behavior, and decrease in opportunities for wolf viewing by Denali National Park and Preserve (DNPP) visitors. The proposer recognizes that wolf harvest within the proposed buffer area has no biological effect on the area's wolf populations, but contends that wolf take in this area could have effects on wolf viewing opportunities.

The department recommends the board consider the following factors: 1) the existing biological data show that the harvest of wolves outside the park is not a problem for sustainability of populations or packs within or outside of the park and preserve; 2) harvest by trappers has increased adjacent to DNPP, but not all of the harvest occurred within the proposed buffer area and not all from packs that are available for viewing by park visitors; 3) the proposed closed area encompasses lands outside the ranges of packs that are primarily within DNPP; 4) viewing opportunities for the public in DNPP depend mostly on where wolves den, where they make kills, and the predominant vegetation types along the viewing routes; 5) trapping outside the park has not been documented as a factor that affects viewing opportunity inside the park; 6) the rare incidences of wolves carrying traps or snares that were reported by the proposer could be minimized through ongoing trapper education efforts; and 7) harvest of wolves adjacent to DNPP may not increase the incidence of louse infestation within the park, as feared by the proposer, because moderate levels of harvest in adjacent Unit 20A have not resulted in increases in louse infestation.

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**PROPOSAL 66**

EFFECT OF THE PROPOSAL: Establish an intensive management area in Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 62.

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**PROPOSAL 67**

EFFECT OF THE PROPOSAL: Establish a bear predation control area implementation plan for Unit 20C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 62.

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**PROPOSAL 68**

EFFECT OF THE PROPOSAL: Establish a Controlled Use Area in Unit 20A

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue between hunters that use different modes of transportation, and should therefore be determined by the board. This proposal seeks to curtail destruction of habitat, environmental degradation, deterioration of quality hunting experience, game and hunter harassment, unsportsmanlike conduct and unsightliness of trails. Destruction of habitat and environmental degradation are land management issues under authority of the Department of Natural Resources. Current game regulations are adequate to manage moose harvests in this portion of Unit 20A.

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**PROPOSAL 69**

EFFECT OF THE PROPOSAL: Modify the motorized vehicle restrictions for the Wood River Controlled Use Area in Unit 20A.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation and user conflict issue between hunters that use different modes of transportation and should therefore be determined by the board. The Wood River Controlled Use Area (WRCUA) encompasses 972 mi<sup>2</sup> in southcentral 20A. It was established in 1976 to include the Yanert drainage to the south and the Tanana Flats to the north. The purpose of the WRCUA was to reduce conflicts between ATV users and airplane and horse users. Boats and aircraft were the only motorized access allowed for hunting. In 1977 the Tanana Flats portion was removed. In 1983 the Yanert drainage was removed and made into the Yanert Controlled Use Area with year-round restrictions on use of motorized vehicles for big game hunters, except aircraft. The same year, the WRCUA's most current boundaries were adopted (with the exceptions that the boundary along the Wood River downstream from Snow Mountain

Gulch was clarified in 2000 and the western boundary was changed and changed back again in the early 2000s), and motorized vehicles, except aircraft, were restricted from use for the purpose of hunting big game during Aug. 1-Sept. 30.

Most hunters currently access the area via aircraft and horse. Since its inception, the WRCUA has had substantial use by guides accessing the area by aircraft and horseback for moose, sheep, caribou, and grizzly bear. If this proposal is adopted, moose harvest would be regulated by the number of “motorized vehicle access” permits issued as drawing permits and therefore would not be a conservation concern. The area covered under this proposal was open to motorized access in the early 2000s after the Middle Nenana Fish and Game Advisory Committee submitted a proposal to the board for its consideration. Within 2 years, that same committee proposed to the board that vehicle restriction be reinstated in that area and the board accommodated their request.  
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**PROPOSAL 70**

EFFECT OF THE PROPOSAL: Allow the use of motorized vehicles for permit winners hunting in the Wood River Controlled Use Area for Unit 20A.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 69.

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**PROPOSAL 71**

EFFECT OF THE PROPOSAL: Designate Creamer’s Field Migratory Waterfowl Refuge as a youth hunting and trapping area.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. Youth can and do already use Creamer’s Refuge. It is managed for multiple use by many groups. Excluding adults who are not accompanied by children from the refuge may not benefit youth or increase use of the refuge. Existing hunting opportunity abounds on and off Creamers Refuge for youth hunters and trappers. Many small game seasons are open year-round in Unit 20. The diversity of moose hunting opportunity in the Fairbanks area is at an all-time historical high, including antlerless seasons that occur before the typical school year begins. However, it is noted in the Creamer’s Refuge Management Plan that some of the historical trapping use of the refuge has been by “youngsters and adults teaching youngsters.” Also, the hunting and trapping management guidelines in the plan include encouragement of educational hunting and trapping activities. Hunting by falconry is popular on the refuge, and adopting this proposal would likely exclude many of the falconers.

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**PROPOSAL 72**

EFFECT OF THE PROPOSAL: Restrict the use of traps near certain recreational areas in Unit 20C.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be decided by the board. The department is sensitive to conflicts between trappers and other user groups. We are also sensitive to the issue of pets caught in traps. The boundaries of the proposed areas would be difficult for trappers and other members of the public to locate. These boundaries would also be difficult to enforce. Latitude and longitude lines or topographical features would be a more practical approach and would be more easily enforced.

It appears that the proponents are mainly concerned with traps and snares near homes or neighborhoods. The proponents apparently wish to alleviate these issues by eliminating all forms of trapping in large geographic areas. The proposal also states that some rural residents feel “shut out” of the land within the community, although this appears to be directed at their inability to trespass on Alaska Railroad lands. It is unclear how the proposal will alleviate this problem.

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**PROPOSAL 73**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose hunting season in Unit 20D.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Department proposal, see issue statement

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**PROPOSAL 74**

EFFECT OF THE PROPOSAL: Modify the bison season dates for residents and nonresidents.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: A longer Delta bison hunting season will allow the department to use hunting as a tool to reduce bison damage to agricultural crops if needed. By adding April 1 through July 19 to the available hunting dates, the department will have more flexibility in targeting bison that do not migrate from agricultural land in the spring. At this time, it is the department’s intent to only use this tool if the Delta farmers agree to have hunting and hunters on their private property.

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**PROPOSAL 75**

EFFECT OF THE PROPOSAL: Allow the taking of Delta bison the same day airborne.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: This proposal would increase hunter success and meet the department’s harvest objectives for the Delta bison herd. The purpose is to reverse declining hunter success rates, which have gone down from nearly 100% to approximately 70%. This is making it difficult to achieve harvest objectives and to reduce bison–agriculture conflicts in the Delta Junction area.

Allowing hunters to take bison when they are at least 300 feet from the airplane when they have been airborne has a potential to result in conflicts between hunters on the ground and same-day-airborne hunters. Therefore, the department recommends amending this proposal to the following:

8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00 a.m. following the day in which the flying occurred; however, this paragraph does not apply to

...

**(G) taking bison in Unit 20(D), for persons departing from and returning to Delta D66 airstrip.**

This amendment will allow hunters to conduct reconnaissance flights to and from the Delta D66 airstrip (the main public air field in Delta Junction) to locate bison from the air, and then pursue them from the ground after returning to Delta D66. This should result in increased hunter success without generating conflicts between hunters.

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**PROPOSAL 76**

EFFECT OF THE PROPOSAL: Allow radio and telephone communications to locate bison in Unit 20A.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: We do not support this proposal because the department is supporting a proposal to allow same-day-airborne hunting of Delta bison. Same-day-airborne hunting will likely increase hunter success enough to attain harvest objectives without causing conflicts. Allowing both same-day-airborne hunting and radio communication could result in pilots spotting bison from the air and directing hunters on the ground via radio communication. This could cause hunter conflict and air safety issues.

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**PROPOSAL 77**

EFFECT OF THE PROPOSAL: Make specific radiocollared bison illegal to shoot in the Delta bison herd.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Department proposal, see issue statement

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**PROPOSAL 78**

EFFECT OF THE PROPOSAL: Eliminate the nonresident closed area in Unit 19A as it applies to both moose and caribou.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: The proposer intends to eliminate the nonresident closed area along river corridors in Unit 19A. This is an allocation issue that should be determined by the board. As the proposer indicates, nonresident moose and caribou seasons are already closed throughout Unit 19A and eliminating the nonresident closed area would have no impact on nonresident hunting opportunities. It is uncertain whether or not the nonresident closed area would provide management benefits in Unit 19A if the nonresident moose and caribou seasons are reestablished. However, this proposal would simplify regulations in Unit 19A.

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**PROPOSAL 79**

EFFECT OF THE PROPOSAL: Change registration permit and general hunt areas and season dates for moose in Unit 19D.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Department proposal, see issue statement

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**PROPOSAL 80**

EFFECT OF THE PROPOSAL: Lengthen the nonresident moose season in Unit 21A by 5 days to end on September 25.

DEPARTMENT RECOMMENDATION: **NO RECOMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The season for nonresidents in 21A is currently September 5–20, not September 5–15 as stated in the proposal; and the season for residents is currently September 5–25. The intent of proposal 80 is to extend the nonresident moose season in Unit 21A by 5 days to end on September 25. The board may wish to consider the effect of passing proposal 81 in their deliberations of this proposal. Proposal 81 would lengthen the nonresident moose season in adjacent Unit 21E by 5 days to also end on September 25.

The Yukon Innoko Moose Management Plan (YIMMP), which was endorsed by the board in March 2006, recommended a conservative approach to moose management, but did not recommended changes to the Unit 21A moose hunting season, which were September 5–25 at that time. However, the nonresident season was reduced by 5 days at the March 2006 board meeting in order to align it with the nonresident season in Unit 21E which was changed at the same meeting. This change took effect in fall 2007.

If proposal 81 passes, lengthening the season in Unit 21A would keep the seasons in Units 21A and 21E aligned. Returning the season in Unit 21A to September 5–25 is also consistent with the YIMMP which recommended this season. Fall composition surveys during November 2008 and

2009 indicate healthy bull:cow ratios (54 bulls:100 cows and 64 bulls:100 cows). These high bull:cow ratios suggest the moose population can sustain an additional 5 days of hunting pressure by nonresidents given the 50-inch, 4 brow tine regulation.

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**PROPOSAL 81**

EFFECT OF THE PROPOSAL: Lengthen the nonresident moose season in 21E by 5 days to end on September 25 or by 10 days to September 30.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: The department recommends lengthening the nonresident season to end on September 25 because this proposal meets the intent of the Yukon Innoko Moose Management Plan (YIMMP) and harvest has been lower than expected. The YIMMP was endorsed by the Board of Game in 2006. The plan recommended establishing a nonresident permit hunt for moose in Unit 21E in an effort to cap nonresident harvest at 30 moose/year. Additionally, the plan recommended shortening the nonresident season by 5 days to end on September 20. The Board adopted both of these measures in 2006 as well as allocating 80% of permits to nonguided hunters and 20% to guided hunters. Currently 60 permits are available (48 nonguided and 12 guided), with the intent of harvesting 30 moose as identified in the YIMMP. However, in the 3 years this permit has been available the hunt has been undersubscribed every year. Success for this hunt has declined to 30% and only 12, 10 and 7 bulls were taken during fall 2007, 2008, and 2009. Issuing more permits will not increase nonresident harvest as the demand does not appear to exist. Returning the season ending to September 25 is therefore a reasonable approach to increasing harvest and will help the department manage for the YIMMP objective of 30 moose taken by nonresidents. The 2-year average bull:cow ratio is 47:100 and additional opportunity is likely available. The Board may wish to simplify the regulation by combining the current guided and nonguided permit hunts into one hunt because these hunts are undersubscribed.

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**PROPOSAL 82**

EFFECT OF THE PROPOSAL: Establish a limited registration permit hunt in Unit 19C for Dall sheep with 3/4-curl or smaller horns, excluding ewes with lambs.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: The department has contacted the proponent to clarify his intent. He would like to establish a subsistence registration hunt with a small number of permits, no use of aircraft, and with permits available in Nikolai, Telida, McGrath, and Takotna only. The department has no recommendation because this is an allocation issue that should be determined by the board. However, if the board adopts this proposal, we recommend against implementation using a limited registration permit because of administrative costs and potential conflicts among hunters. We also recommend against implementation using an unlimited registration permit because of the difficulty controlling harvest. The board may wish to consider implementation using a Tier II or community harvest hunt.

There is currently no customary and traditional use finding in regulation for sheep in Unit 19.

The department will be prepared to provide information pertaining to the 8 criteria in 5 AAC 99.010 to assist the board in making a customary and traditional use determination prior to considering the proposed limited registration hunt. General season sheep harvest averaged 66 full-curl rams from Unit 19C during 2005–2009. An additional limited hunt across Unit 19C for less than 10 sheep is likely sustainable.

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**PROPOSAL 83**

EFFECT OF THE PROPOSAL: This proposal would eliminate the early reporting requirement for wolves harvested in the Unit 19D East wolf predation control area.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Department proposal, see issue statement

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**PROPOSAL 84**

EFFECT OF THE PROPOSAL: Establish a predation control implementation plan in Unit 21E.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Department proposal, see issue statement.

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**PROPOSAL 85**

EFFECT OF THE PROPOSAL: Establish a predation control implementation plan in Unit 21E.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: This proposal was deferred by the Board of Game from the Spring, 2009 meeting. It was previously listed as proposal 238. Updated proposed regulatory language is provided by the Department of Fish and Game in Proposal 84.

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**PROPOSAL 86**

EFFECT OF THE PROPOSAL: Establish a predation control implementation plan in Unit 21E.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: This proposal was deferred by the Board of Game from the Spring, 2009 meeting. It was previously listed as proposal 239. Updated proposed regulatory language is provided by the Department of Fish and Game in Proposal 84.

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**PROPOSAL 87**

EFFECT OF THE PROPOSAL: Modifies the language for the Koyukuk Controlled Use Area so that aircraft use, as an intermediate transport method near the perimeter of the area, is more

restricted.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The proposer appears to request a no-fly-in buffer around the Koyukuk Controlled Use Area (KCUA). The KCUA is one of the oldest controlled use areas in Alaska, first appearing in the 1979–1980 regulations. It was created to address user conflicts and biological concerns. The KCUA continues to address those concerns and has become an important management tool for maintaining reasonable opportunity for subsistence uses of moose.

Based on recommendations of the Koyukuk River moose management planning effort, the board adopted regulations in 2000 that established registration and drawing permit hunts within the KCUA. Hunt conditions that reflected traditional and customary practices were applied to the subsistence registration permit (RM832 permit) under the department’s discretionary authority, including the requirements of sawing through the palm of the moose antler and salvaging meat on the bone. Those measures have been effective in reducing demand and decreased the number of hunters who obtain this permit.

Hunter numbers and harvest within the KCUA are now well managed using the registration and drawing permit system established in 2000. Management of harvest levels and distribution of hunters also improved in the surrounding areas with the adoption of this permit system. Permits will continue to be issued at levels determined to meet management objectives, and the KCUA continues to be an important component of the management strategies of the lower Koyukuk River drainage.

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**PROPOSAL 88**

EFFECT OF THE PROPOSAL: Eliminate Drawing Permit hunts DM809, DM810, and DM811 on the Upper Nowitna River above the Susulatna River.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: Three drawing permits, DM809, DM810, and DM811 and registration permit RM834 are valid for the upper Nowitna River corridor. The current management strategy utilizing these permits was developed to improve bull:cow ratios within the corridor, improve hunter distribution throughout Unit 21B, eliminate “bootlegging” of moose from the upper to lower Nowitna, and improve fall success rates for local hunters to reduce winter moose harvest. This management strategy for Unit 21B has been effective in moving toward these management objectives. A change at this time would compromise that success.

There were 10 resident drawing permits (DM810), and 10 nonresident drawing permits (3 nonguided only – DM809; 7 guided only – DM811) issued in 2009. The number of RM834 permits is not restricted. This resident-only permit requires destruction of trophy value of the antlers. Therefore, resident hunters have two options (DM810 vs. RM834) to hunt within the upper Nowitna River corridor. Number of drawing permits is determined annually based on the

most recent moose population data (sustainable harvest level) and current hunter success rates. Only 6 hunters applied for the 7 DM811 permits available in 2009, therefore the concern expressed regarding an inadequate number of guided nonresident permits does not appear to be an issue at this time. Finally, if the size of the permit area is reduced, a reduction in the number of permits will necessarily occur.

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**PROPOSAL 89**

EFFECT OF THE PROPOSAL: Change the location description of the Koyukuk River hunter check station and clarify salvage requirements of the registration permit hunt conditions.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal – see issue statement.

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**PROPOSAL 90**

EFFECT OF THE PROPOSAL: Establish a 10-day antlered bull moose season during April 5–15 in the Kanuti Controlled Use Area of Unit 24B.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: The department recommends amending this proposed season to an antlered bull-only registration hunt during December 15–April 15 in Unit 24B downstream from and including Henshaw Creek Drainage and in Unit 24C. We also recommend the bag be restricted to antlered bulls with at least 1 antler that is at least as long as the ear. Specifying antler length will lessen the chance that cows are inadvertently harvested. If this proposal is adopted, we also recommend requiring no use of aircraft and 72-hour reporting, using department discretionary permit authority.

The extended season will give hunters most of the winter to take an antlered bull without being pressured to harvest the first moose they encounter. It is improbable that the sustainable harvest will be exceeded; therefore, the bull-moose quota consultation process requested in the proposal is unnecessary. Inclusion of Unit 24C in the amended language of this proposal will address issues identified in proposal 91.

The moose population in Unit 24B declined by approximately 50% from 1993 through 2007. Pursuant to the Koyukuk River Moose Management Plan, the management objective is for growth of the population that returns it to the 1993 level. To achieve that objective, the department has opposed fall antlerless and late winter hunts in Units 24B, 24C and 24D where cow moose might be harvested. Most bulls have dropped their antlers by late winter (Feb.–Mar.), therefore, hunts during that time risk harvest of cow moose needed for population growth. In Unit 24B, federal managers opened late winter (March 1–5) “bulls only” seasons in 2007, 2008, and 2009, which resulted in a 3-year total harvest of one bull (0.33 moose/year), and received intense public opposition over enforcement of the “bulls only” restriction. Because those hunts did not result in a meaningful harvest, it is clear that a similar hunt in late winter will not provide

meaningful opportunity.

Moose management in Units 24B and 24C is unique because the bull:cow ratios are typically high (50–70 bulls:100 cows), densities are low (0.20–0.25 moose/mi<sup>2</sup>) over a very large area, and residents of only 4 small villages harvest relatively few moose. Since the decline of the moose population, success rates in the fall hunt declined; yet, bull:cow ratios and harvest rates indicate additional bull harvest opportunities exist.

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**PROPOSAL 91**

EFFECT OF THE PROPOSAL: Establishes a spring antlered moose season in the Koyukuk Controlled Use Area of Units 24C, 24D, and 21D.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The department recommends the board not adopt this proposal. The moose population is below the management objectives in these units. Additional moose hunting opportunity is not available at this time, if the objective is to be achieved. Moose harvest by local residents is high and is at or above historic harvest levels. Local resident harvest has increased steadily in the last 9 years, with State and Federal moose seasons in September, December, and March.

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**PROPOSAL 92**

EFFECT OF THE PROPOSAL: Clarifies proxy hunting restrictions for Units 21B, 21C, 21D and 24.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 93**

EFFECT OF THE PROPOSAL: Establishes an Intensive Management positive finding for moose and establishes population and harvest objectives in Unit 21B.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 94**

EFFECT OF THE PROPOSAL: Changes the boundaries of the Kanuti Controlled Use Area and identifies the Latitude and Longitude positions at the corners of the area.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an allocation issue that should be determined by the board. The current boundaries of the Kanuti Controlled Use Area (KCUA) extend to Bettles VOR, but result in little real protection in the northeastern portion of the KCUA because of limited landing sites, private lands and poor moose habitat that naturally exclude hunters that use airplanes for transportation. The proposed change will reduce the size of the KCUA by 298 mi<sup>2</sup> (13.6%). The boundary change will not change access restrictions on the Kanuti Flats to the south and around Allakaket to the west, but will no longer restrict the proponent. The proposed language will resolve the problem for the proponent, clarify the boundaries, and simplify identification of the boundaries for hunters in the field. However, some local residents favor the KCUA and may perceive adoption of this change as an erosion of protected areas.

The KCUA is one of the oldest controlled use areas in Alaska, first appearing in the 1979–1980 regulations. It was created to address user conflicts and biological concerns and since that time the KCUA has become important management option for maintaining reasonable opportunity for subsistence uses of moose.

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**PROPOSAL 95**

EFFECT OF THE PROPOSAL: Reduces the bag limit for beaver during the trapping season from no limit to 50 beaver per season in Units 25A, 25B and 25D.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The Department recommends not adopting this proposal because we have no conservation concerns associated with no bag limit for beavers in Unit 25 and because we would like to maintain the current "no bag limit" for beaver across all of Region 3.

Sealing records prior to 2002 indicate no single trapper harvested more than 50 beavers per season. In 2008, the board adopted a proposal to liberalize seasons and bag limits and to simplify beaver seasons across most units throughout Region III. That regulatory change resulted in the current seasons and bag limits for Unit 25. In 2008 the Yukon Flats Advisory Committee did not support the Region III beaver proposal for Units 25A, 25B, and 25D and submitted this proposal in consideration of maintaining the 50 beaver per season bag limit for those units.

Although no population estimates are available, beaver are abundant throughout Unit 25 and harvest is low. The sealing requirement for beaver was eliminated by the board in 2002 due to abundant beaver populations, low harvest, and minimal conservation concerns. Sealing data from 1984–2001 indicates a declining trend in the combined annual beaver harvest in Units 25A, 25B, and 25D from 300–500 in the 1980s to 50–200 in the early 2000s. Current harvest is likely similar or less than the observed harvest during the early 2000s. Poor fur markets and increased trapping expense likely resulted in the observed decline in harvest.

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**PROPOSAL 96**

EFFECT OF THE PROPOSAL: Extend the ending date of the mink and weasel trapping seasons

in Units 26B and 26C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 97**

EFFECT OF THE PROPOSAL: Allow black bear snaring in Unit 25D.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The department does not support snaring of black bears outside of active predator control areas. Black bear snaring is a controversial method of take that should be applied only in predator control areas where implementation plans have been adopted by the Board. These plans require thorough analysis of predator and prey populations and harvest, and assure that predators will be maintained as part of the ecosystem.

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**PROPOSAL 98**

EFFECT OF THE PROPOSAL: Allow the harvest of any black bear in Unit 25D.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The department does not support any bear bag limits outside of active predator control areas or outside of customary and traditional use activities at den sites in approved units. Any bear bag limits are a controversial method of take that should be applied only in predator control areas where implementation plans have been adopted by the Board. These plans require thorough analysis of predator and prey populations and harvest, and assure that predators will be maintained as part of the ecosystem.

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**PROPOSAL 99**

EFFECT OF THE PROPOSAL: Restrict the nonresident caribou hunting season and bag limit for the Porcupine Herd in Unit 25B, Unit 25D, Unit 26C, and a portion of Unit 25A.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: Staff proposal — see issue statement.

The original department proposal recommends changes to the nonresident season and bag limit for the Porcupine Caribou Herd (PCH) in eastern Unit 25A, and Units 25B, 25D and 26C. We recommend amending this department proposal to incorporate elements of public proposal 100 to extend the resident and nonresident seasons for the Central Arctic Caribou Herd (CAH) in the remainder of Unit 25A to June 30. Additionally, we recommend that CAH harvest be limited to bulls only during May 16–June 30.

The CAH increased substantially from 32,000 caribou in 2002 to 67,000 caribou in 2008 and additional hunting opportunity is warranted. Harvest pressure is low with a harvest rate less than 2% annually, consisting mostly of bulls (>90%). Likely this extended season will not result in a large increase in harvest, but may provide some additional hunting opportunity for a few hunters. Because harvest is expected to remain low, we are not concerned about additional take of bulls that may occur on resident groups.

Although, our original proposal reduces the nonresident season and bag limit for Porcupine Caribou Herd (PCH) in eastern Unit 25A, it maintains current and historical PCH use patterns by nonresident hunters. Notably, it is a good faith effort to manage the PCH in concert with harvest planning in Canada by eliminating unnecessary portions of nonresident seasons and bag limits from the regulations, particularly when those seasons and bag limits are not utilized. It is not necessary to further restrict nonresident hunters because harvest in Alaska is suspected to be below the estimated harvestable surplus, and the harvestable surplus is above the amount necessary for subsistence. In addition, harvest in Alaska is much lower than harvest in Canada.

The last PCH photo-census was in 2001. Annual census attempts since 2004 have been unsuccessful. The herd is currently estimated at 90,000–110,000 caribou, and we estimate the harvestable surplus is 4,500–5,500 caribou (5% harvest rate). The amount necessary for subsistence in Alaska is 1,250–1,550 caribou annually. Current harvest data are not available. However, when the herd was much larger than it is now ( $\geq 150,000$  caribou), total harvest in Alaska and Canada was estimated at 4,000–6,000 annually (600–900 in Alaska; 3,900–5,100 in Canada). Both Alaska and Canada are currently making efforts to obtain better harvest data.

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**PROPOSAL 100**

EFFECT OF THE PROPOSAL: Lengthen the resident season and bag limit for caribou in Unit 25A in a portion of the Chandalar River drainage, by extending the season from July 1–April 30 to July 1–June 30; however, limit harvest during May 1–June 30 to velvet antlered bulls and antlerless cows.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 99.

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**PROPOSAL 101**

EFFECT OF THE PROPOSAL: Modify the bag limit for caribou in Unit 26B, Dalton Highway Corridor Management Area, by requiring hunters who walk from the Dalton Highway to take one caribou of the bag limit at a time and remove all of the edible meat from the field to the road, before they are allowed to take more caribou of the bag limit.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: This is an ethics issue that should be determined by the board. The proponent's

concern is that walk-in hunters are unable to remove their meat from the field in a timely manner if more than 1 caribou is bagged at a time. He is concerned about wasting meat. The terrain is largely tussocks, which are difficult to traverse, even for hunters in good physical condition, and some walk-in hunters may overestimate their ability to pack out a caribou over this type of terrain. The proponent is especially concerned about this issue if proposal 104 is passed to increase the caribou bag limit to 5 caribou.

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**PROPOSAL 102**

EFFECT OF THE PROPOSAL: Modify the resident season and bag limit for caribou in Unit 26B by extending the season from July 1–April 30 to July 1–June 30; however, only velvet antlered bulls and antlerless cows may be taken May 1–June 30.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 104.

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**PROPOSAL 103**

EFFECT OF THE PROPOSAL: Lengthen the resident season and bag limit for caribou in Unit 26B, south of 69° 30' N, by extending the season from July 1–April 30 to July 1–June 30; however, limit harvest during May 1–June 30 to velvet-antlered bulls and antlerless cows.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: See analysis and recommendation for proposal 104.

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**PROPOSAL 104**

EFFECT OF THE PROPOSAL: Increase resident hunters' bag limit for caribou in northwestern Unit 26B to 5 caribou per day. Increase resident and nonresident hunters' bag limit in the remainder of Unit 26B to 5 caribou; however, cow caribou may be taken only during September 1–April 30.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: Staff proposal — see issue statement. This proposal increases hunting opportunity for the Central Arctic Caribou Herd (CAH) in Unit 26B. In addition, we recommend the following amendment based on components of our original proposal and public proposal 103.

Three geographic areas are addressed in this amendment: 1) northwestern Unit 26B by Nuiqsut, which is that portion north of 69° 30'N. lat. and west of the east bank of the Kuparuk River to a point at 70° 10'N. lat., 149° 04' W. long., then west approximately 22 miles to 70° 10' N. lat., and 149° 56' W. long., then following the east bank of the Kalubik River to the Arctic Ocean; 2) Unit 26B south of 69° 30'N. lat.; and 3) remainder of Unit 26B, which is north of 69° 30'N. lat., but excludes northwestern Unit 26B by Nuiqsut. The following includes amended language combined

with the original proposal.

- 1) Northwestern Unit 26B by Nuiqsut. We recommend a resident season of July 1–June 30, with a bag limit of 5 caribou per day; however, only bulls may be harvested during May 16–June 30. This extends the resident season and increases the resident bag limit.
- 2) Unit 26B, south of 69° 30'N. lat. We recommend a resident and nonresident bag limit of 5 caribou with a season of July 1–June 30; however, only bulls may be harvested during May 16–June 30. This extends the resident and nonresident seasons, increases the bag limit, and modifies the season dates for shooting cow caribou.
- 3) Remainder of Unit 26B. We recommend a resident and nonresident bag limit of 5 caribou with a season of July 1–April 30. This retains the season dates, increases the resident and nonresident bag limits, and eliminates the restriction on shooting cow caribou. We do not recommend extending this season into May and June because this portion of Unit 26B encompasses the CAH calving grounds.

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### **PROPOSAL 105**

EFFECT OF THE PROPOSAL: Develop a management plan for the Central Arctic caribou herd in Units 26B and 26C.

DEPARTMENT RECOMMENDATION: **TAKE NO ACTION**

RATIONALE: This proposal does not address a regulation and therefore requires no regulatory action by the board. The department has management goals and objectives in place for the Central Arctic Herd (CAH). This herd has grown substantially from 32,000 caribou in 2002 to 67,000 caribou in 2008. Harvest pressure is low with a harvest rate less than 2% annually, consisting mostly of bulls (>90%). Because the harvest rate is low, the department submitted proposal 104 to increase the bag limit for CAH caribou to provide additional hunting opportunity. The department would reconsider the management strategy on the CAH if changes are made in Alaska Statutes 16.05.789 and 19.40 which prohibit hunting with firearms and use of off-road vehicles in the area within five miles on either side of the highway and north of the Yukon River.

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### **PROPOSAL 106**

EFFECT OF THE PROPOSAL: For moose harvested in Unit 25, all meat of the front quarters, hind quarters, and the ribs must remain naturally attached to the bone until transported from the field or processed for human consumption.

DEPARTMENT RECOMMENDATION: **NO RECOMMENDATION**

RATIONALE: The Department has no data concerning wanton waste in Unit 25, and the Alaska Wildlife Troopers do not issue excessive wanton waste citations compared to other interior Game Management Units. The unit is vast and access varies widely, including motorized and

non-motorized boats, aircraft, highway vehicles, and ATVs. Leaving the edible meat attached to the bone is commonly practiced by hunters. However, many hunters remove the meat from the bone at kill sites or camps to facilitate packing or transport by airplane or boat. In general, meat can be successfully salvaged for human consumption when proper procedures are followed when using the “boning” technique. Requiring meat to be left on the bone until processed for human consumption does not ensure adequate preservation. Many factors, including weather, cleanliness during field care and transport, and the use of game bags affect meat condition to the point of processing.

Generally, moose occur at low density in Unit 25 and hunter access is difficult due to remoteness from roads (with the exception of Unit 25C). During 2006–2008, 78% of hunters accessed Unit 25A with aircraft, 81% accessed Unit 25B by boat, 70% accessed Unit 25D by boat, and 72% accesses Unit 25C with highway vehicle or ATV.

During 2006–2008, reported harvest averaged 102 moose taken by 314 hunters in Units 25A, 25B, and 25D combined. In Unit 25C, reported harvest averaged 70 moose taken by 340 hunters over the same time period.

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### **PROPOSAL 107**

EFFECT OF THE PROPOSAL: Open a moose season by registration permit in Unit 26C.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: Opening a registration permit hunt will likely result in overharvest, even if a short reporting requirement is in place. The North Slope moose population in Units 26A, 26B, and 26C declined dramatically during the early 1990s and moose seasons were substantially restricted in Unit 26A and closed in Units 26B and 26C in 1996. Gradually during the 2000s, the population increased, beginning in Unit 26A and subsequently in Unit 26B. Seasons were liberalized in Unit 26A during that time and re-opened in Unit 26B in 2006. The Unit 26C hunting season has remained closed because that population has not increased.

The nature of Unit 26C terrain and the sparse, low vegetation makes it possible for trend surveys to account for a large percentage of the moose in areas supporting major concentrations of moose. These surveys, recently conducted by Arctic National Wildlife Refuge (ANWR) staff along drainages of the coastal plain, indicate a population of 47–61 moose (spring surveys: 2003, 2005, 2007, 2009). At a 3% harvest rate, 1–2 bull moose can be taken from this population. This harvest quota is already being taken under federal regulations.

Although the coastal plain and most North Slope drainages are surveyed for moose, no recent survey data is available for the upper Kongakut and Firth–Mancha drainages where 227 moose were observed during a trend survey in 2002. More recent surveys in this particular area are needed to verify population status. At the spring 2008 board meeting, the department agreed to work with ANWR staff to collect information about the status of moose in the Firth–Mancha drainages to determine if some hunting opportunity could be established. We have no new information at this time, although progress has been made in acquiring satellite radio collars to

be used in a movement study conducted by ANWR.

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**PROPOSAL 108**

EFFECT OF THE PROPOSAL: Reauthorize the existing antlerless moose season in Berners Bay for Unit 1C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 109**

EFFECT OF THE PROPOSAL: Reauthorize the existing antlerless moose season in the Gustavus area for Unit 1C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 110**

EFFECT OF THE PROPOSAL: Reauthorize the existing antlerless moose season in Unit 5A

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 111**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in Unit 6A.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 112**

EFFECT OF THE PROPOSAL: Reauthorizes the antlerless moose season in Unit 6B.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 113**

EFFECT OF THE PROPOSAL: Reauthorizes the antlerless moose season in Unit 6C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 114**

EFFECT OF THE PROPOSAL: Reauthorizes the drawing permit hunts for antlerless moose in Unit 14A.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 115**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in the Twentymile/Portage for Units 7 and 14C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 116**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in Fort Richardson Mgmt area for Unit 14C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 117**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in the Anchorage Mgmt area for Unit 14C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 118**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in the Birchwood Mgmt area for Unit 14C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 119**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose hunt on Elmendorf Air Force Base for Unit 14C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 120**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless portion of the any-moose drawing permit Ship Creek for Unit 14C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 121**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in the Skilak Loop Wildlife Mgmt area for Unit 15C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 122**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season for Unit 15C.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 123**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose hunt on Kalgin Island for Unit 16B.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 124**

EFFECT OF THE PROPOSAL: Reauthorize the brown bear tag fee exemptions in Region II.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 125**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose season in Unit 23.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 126**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose seasons in Unit 26A.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 127**

EFFECT OF THE PROPOSAL: Reauthorize the antlerless moose seasons in Unit 22C and the remainder of Unit 22D.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 128**

EFFECT OF THE PROPOSAL: Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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**PROPOSAL 129**

EFFECT OF THE PROPOSAL: Establish brown bear baiting seasons in Unit 21D.

DEPARTMENT RECOMMENDATION: **DO NOT ADOPT**

RATIONALE: The Department does not support baiting of brown bears outside of predator control areas. Brown bear baiting is a controversial method of take that should be applied only in predator control areas where implementation plans have been adopted by the Board. These plans require thorough analysis of predator and prey populations and harvest, and assure that predators will be maintained as part of the ecosystem.

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**PROPOSAL 130**

EFFECT OF THE PROPOSAL: Expand the fall black bear baiting season to the remainder of Unit 21D and lengthen the season dates to August 1 to October 15.

DEPARTMENT RECOMMENDATION: **AMEND AND ADOPT**

RATIONALE: The department recommends amending this proposal to lengthen the baiting season in the Koyukuk Controlled Use Area (CUA) in Unit 24. The CUA portion of Units 21D and 24 currently has a September 1–25 black bear baiting season. Lengthening the season in the entire CUA and expanding it to the remainder of Unit 21D is not likely to have a measurable biological effect on black bear populations and the season would be consistent throughout the CUA. Estimated black bear harvest in the Koyukuk CUA has averaged less than 5.4 bears per year, but less than 1 per year is harvested over registered bait stations. Total harvest for Unit 21D is estimated to be 20–50 per year. Because black bears are difficult to hunt in this area, most black bear harvest is incidental to other activities such as moose hunting or berry picking. Also, several bears causing damage at fish camps are harvested each year.

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**PROPOSAL 131**

EFFECT OF THE PROPOSAL: Modify regulations 5AAC 92.110 and 5AAC 92.115 to more appropriately facilitate cooperative wildlife management on federal lands.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: This is a joint ADF&G and Board of Game proposal. The State has the authority and responsibility to manage wildlife on all lands within its borders, regardless of landownership. Certain language within these two existing regulations may be construed as requiring the State to abdicate its authority and responsibility relative to the management of its wildlife resources. This authority and responsibility is a function of the constitutionally guaranteed sovereignty of Alaska, and applies to all states within the union. The courts have repeatedly recognized that the states' sovereignty includes their authority to manage wildlife, and is protected under the Tenth Amendment to the United States Constitution and the principles of federalism it embodies.

Subsequent federal legislation routinely adds a clause reaffirming the states' authorities over wildlife management. Examples include:

- The Wilderness Act of 1964  
(8) Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests.
- Alaska National Interest Lands Conservation Act of 1980  
SEC. 1314. (a) Nothing in this Act is intended to enlarge or diminish the responsibility and authority of the State of Alaska for management of fish and wildlife on the public lands except as may be provided in title VIII of this Act, or to amend the Alaska constitution.
- National Wildlife Refuge System Improvement Act of 1997  
Sec. 8 (m) Nothing in this Act shall be construed as affecting the authority, jurisdiction, or responsibility of the several States to manage, control, or regulate fish and resident wildlife under State law or regulations in any area within the System.

The Master Memorandum of Understanding between the Department and the US Fish and Wildlife Service (1982), also affirms that the Department has “the primary responsibility to manage fish and resident wildlife within the State of Alaska” and has the right to “enter onto Service lands at any time to conduct routine management activities which do not involve construction, disturbance to the land, or alterations of ecosystems.”

Additionally, Alaska's constitution and statutes reaffirm the State's trust responsibility to manage its wildlife assets for the benefit of its citizenry.

The Alaska Constitution (Article 8, Sections 1-4) mandates that Alaska's wildlife resources are to be managed:

- for the maximum use consistent with the public interest
- for the maximum benefit of its people
- to the people for common use, and
- on the sustained yield principle

In AS 16.05.020 (2), the Alaska Legislature mandated that the commissioner of the Department of Fish and Game shall “manage, protect, maintain, improve, and extend the fish, game and aquatic plant resources of the state in the interest of the economy and general well-being of the state.”

In addition, it has become clear to the Department and the Board of Game that the requirement for “approval” of State management programs involving predator management under these two regulations may be construed as a “federal action” under the National Environmental Policy Act (NEPA), and thus require cooperating federal agencies to needlessly embark upon a cumbersome

NEPA process whenever the State becomes involved in predator management on or near National Wildlife Refuges, or National Park units in Alaska

Although at least two previous federal appeals court rulings (DC and 9<sup>th</sup> Circuit) have found that the control of wolves is not a “major federal action significantly affecting the quality of human environment.” and NEPA therefore does not apply, third parties may continue to try to litigate the issue if a “federal action” is involved. The State meticulously addresses each program under a Predation Control Areas Implementation Plan that is thoroughly vetted by biologists, the public, and the Board of Game process.

NEPA was never intended to be used in an obstructionist way to hinder agencies from conducting routine management activities. Without changes to these regulations, routine management may be more vulnerable to lawsuits from third parties who disagree with the state and federal governments on the need for predator management programs.

To be effective, adaptive, and to be conducted in a responsible manner, wildlife management programs must be responsive, and ADF&G biologists must be able to modify programs as needed.

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**PROPOSAL 132**

EFFECT OF THE PROPOSAL: Establish a predator control area for Unit 10, Unimak Island.

DEPARTMENT RECOMMENDATION: **ADOPT**

RATIONALE: Staff proposal — see issue statement.

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