

PLEASE READ CAREFULLY

***REVIEWER LETTER***

DEAR REVIEWER:

December, 2009

The Alaska Board of Game will consider the attached book of regulatory proposals at its Interior Region meeting to be held February 26 - March 7, 2010 at the Westmark Fairbanks Hotel in Fairbanks, Alaska. The proposals generally concern changes to the regulations governing hunting and the use of game in the Interior Region (Region III). Members of the public, organizations, advisory committees, and department staff submitted these proposals, which are published essentially as they were received.

The proposals are presented as brief statements summarizing the intended regulatory changes. In cases where confusion might arise or where the regulation is complex, proposed changes are also indicated in legal format. In this format, bolded and underlined words are **additions** to the regulation text, and capitalized words or letters in square brackets [XXXX] are deletions from the regulation text.

The proposals are set forth in the Table of Contents, which is not the order they will be considered at the board meeting. Prior to the meeting, the board will generate and make available to the public the order of proposals to be deliberated by the board, also known as the "roadmap." The roadmap may be changed up to and during the meeting.

Before taking action on these proposed changes to the regulations, the board would like your written comments and/or oral testimony on any effects the proposed changes would have on your activities.

After reviewing the proposals, please send written comments to:

**ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094**

Public comment, in combination with Advisory Committee comments and department staff presentations, provide the Board of Game with useful biological and socioeconomic data to form decisions. Comments may be submitted at any time until the public testimony period for that proposal and/or its subject matter is closed at the meeting and the board begins deliberations. As a practical matter, you are encouraged to mail or fax your written comments to the above Juneau address no later than 5:00 p.m. on Friday, February 12, 2010 to ensure inclusion in the board workbook. All comments received after that time will be presented to board members at the time of the meeting. Written comments will also be accepted during the board meeting and public testimony during the public testimony portion of the meeting is always appreciated. Written comments become public documents.

When providing written comments on the proposals in this proposal book, please consider the following tips to help ensure board members and the public more fully understand recommendations to the board:

**Timely Submission:** Submit written comments by fax or mail at least two weeks prior to the meeting. Comments received at least two weeks prior to the meeting are printed and cross referenced with proposals and included in the board members' workbooks. Written comments received after the two-week period will be provided to board members at the meeting and will not be cross referenced. Materials received during the meeting also are not cross referenced. If you provide written comments during a board meeting, submit 20 copies to Board Support Section staff, who will distribute your written comments to board members. If including graphs or charts, please indicate the source.

**List the Proposal Number:** Written comments should indicate the proposal number(s) to which the comments apply. Written comments should specifically state "support" or "opposition" to the proposal(s). This will help ensure written comments are correctly noted for the board members. If the comments support a modification in the proposal, please indicate "support as amended" and provide a preferred amendment in writing.

**Do Not Use Separate Pages When Commenting on Separate Proposals:** If making comments on more than one proposal, please do not use separate pieces of paper. Simply begin the next set of written comments by listing the next proposal number.

**Provide an Explanation:** Please briefly explain why you are in support or opposition of the proposal. Board actions are based on a complete review of the facts involved in each proposal, not a mere calculation of comments for or against a proposal. Advisory committees and other groups also need to explain the rationale behind recommendations. Minority viewpoints from an advisory committee should be noted in advisory committee minutes along with the majority recommendation. The board benefits greatly from understanding the pro and cons of each issue. A brief description consisting of a couple of sentences is sufficient.

**Write Clearly:** Comments will be photocopied so please use 8 1/2" x 11" paper and leave reasonable margins on all sides, allowing for hole punches. Whether typed or handwritten, use dark ink and write legibly.

**Use the Correct Address or Fax Number:** Mail written comments to Board of Game Comments, ADF&G, P.O. Box 115526, Juneau, AK 99811-5526; fax them to 907-465-6094; or deliver them to a Regional Boards Support Office.

**Advisory Committees:** In addition to the above, please make sure the Advisory Committee meeting minutes reflect why the committee voted as it did. If the vote was split, include the minority opinion. A brief description consisting of a couple of sentences is sufficient. Detail the number in attendance (e.g., 12 of 15 members) and indicate represented interests such as subsistence, guides, trappers, hunters, wildlife viewers, etc.

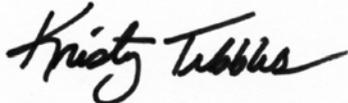
Pertinent policies and findings, proposals, written comment deadlines, meeting calendars and notices for the Board of Game meetings are posted on the Board Support website at <http://www.boards.adfg.state.ak.us/>.

A tentative agenda for the Interior Region Board of Game meeting is shown on page xv. A roadmap detailing the tentative order in which proposals will be made available in February, 2010 at <http://www.boards.adfg.state.ak.us/>.

Updated Status of the Meeting: After the board meeting begins, a recorded telephone message will provide current updates on the board's agenda and schedule. Dial (800) 764-8901 (in Juneau, call 465-8901).

A link to a live audio broadcast of the meeting is intended to be available at: <http://boards.adfg.state.ak.us/gameinfo/index.php> throughout the meeting. This link will not function when the board is not in session. Board actions will also be posted on the website shortly after the meeting.

Additional Accommodations: Persons with a disability needing special accommodations in order to comment on the proposed regulations should contact the Boards Support Section at (907) 465-4110 no later than February 12, 2010 to make any necessary arrangements.



Kristy Tibbles, Executive Director  
Alaska Board of Game  
Alaska Department of Fish and Game  
(907) 465-4110

**ALASKA BOARD OF GAME**  
**Spring, 2010 Proposal Book**  
**Interior Region**

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**ALASKA BOARD OF GAME  
GUIDELINES  
FOR  
PUBLIC TESTIMONY  
&  
ADVISORY COMMITTEE TESTIMONY**

Persons planning to testify before Board of Game hearings must fill out a blue PUBLIC TESTIMONY SIGN-UP CARD and turn it in to the board's staff. Persons providing written material for the board members must provide at least **20 copies** to the staff; and **submit with your blue testimony card**. Do not wait until it is your turn to testify to submit written material, as it may not be distributed to the board in time for your testimony. **Provide a name and date on the first page of written material and identify the source of graphs or tables, if included in materials.**

When the chairman calls your name, please go to the microphone; state your name and whom you represent. At the front table, a green light will come on when you begin speaking. A yellow light will come on when you have one minute remaining. A red light will indicate that your time is up. When you are finished speaking, please stay seated and wait for any questions board members may have regarding your comments.

**If you wish to give testimony for more than one group** (i.e., yourself plus an organization, or advisory committee), you only need to turn in one sign-up card, listing each group you will be representing. When you begin your testimony, state for the record the group you are representing. Keep your comments separate for each group. For example: give comments for the first group you are representing, then after stating clearly that you are now testifying for the second group, give comments for that group.

Please be aware that when you testify you may not ask questions of board members or of department staff. This is your chance to make comments on proposals before the board. If board members and/or department staff need clarification, they will ask you questions. **A person using derogatory or threatening language to the board will not be allowed to continue speaking.**

Generally, the board allows five minutes for oral testimony, whether you testify for yourself or on behalf of an organization. The board chairman will announce the length of time for testimony at the beginning of the meeting.

Advisory Committee representatives are usually allowed 15 minutes to testify, and should restrict testimony to relating what occurred at the advisory committee meeting(s). Testimony should be a brief summary of the minutes of the meeting, and copies of the minutes should be available for the board members. An Advisory Committee representative's personal opinions should not be addressed during Advisory Committee testimony.

**PLEASE NOTE:** The time limit on testimony does NOT include questions the board members may have for you.

**ALASKA BOARD OF GAME**  
Tentative Meeting Schedule  
2009/2010 Cycle

<b>Meeting Dates</b>	<b>Topic</b>	<b>Location</b>
<b>November 13-16, 2009</b> (4 days)  Proposal Deadline: August 28, 2009 Written Comments: October 30, 2009	<b>Arctic Region</b>	<b>Nome</b> Mini Convention Center
<b>January 29-February 1, 2010</b> (4 days)  Proposal Deadline: November 6, 2009 Written Comments: January 15, 2010	<b>Statewide Regulations Cycle A</b>	<b>Anchorage</b> Egan Center
<b>February 26-March 7, 2010</b> (10 days)  Proposal Deadline: December 4, 2009 Written Comments: February 12, 2010	<b>Interior Region</b>	<b>Fairbanks</b> Westmark Fairbanks Hotel

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For information about the Board of Game, contact:

Alaska Department of Fish and Game  
 Boards Support Section  
 P.O. Box 115526  
 Juneau, AK 99811-5526  
 Phone: (907) 465-4110  
 Fax: (907) 465-6094  
<http://www.boards.adfg.state.ak.us/>

**ALASKA BOARD OF GAME**  
Meeting Cycle

The board meeting cycle generally occurs from October through March. The board considers changes to regulations on a region-based schedule. Each region will be discussed on a two-year cycle. When the regional area is before the board, the following regulations are open for consideration within that region:

- Trapping Seasons and Bag Limits -- All species
- General and Subsistence Hunting Seasons and Bag Limits -- All species  
(Except antlerless moose hunts as noted below)
- Wolf Control Implementation Plans
- Bag Limit for Brown Bears
- Areas Closed To Hunting
- Closures and Restrictions in State Game Refuges
- Management Areas
- Controlled Use Areas
- Areas Closed To Trapping

Regulations specific to an area (e.g., Permits for Access to Round Island) will be taken up when the board is scheduled to consider regulations in that region. Proposals for changes to regulations pertaining to reauthorization of antlerless moose hunts, 5 AAC 85.045, and brown bear tag fee exemptions, 5 AAC 92.015, will be taken up annually, at spring meetings.

The Board of Game does not consider proposals to statewide regulations in every meeting cycle. Instead, the Board of Game reviews statewide regulations on a four-year cycle, distributed between fall meetings, every other year. The list of statewide regulations and the associated “Cycle A” and “Cycle B” meeting schedule is set forth on the next page of this publication.

<u>Regulations for:</u>	<u>Will be considered:</u>		
<b>SOUTHEAST REGION</b>	Fall 2010	Fall 2012	Fall 2014
Game Management Units: 1, 2, 3, 4, 5			
<b>SOUTHCENTRAL &amp; SOUTHWEST REGIONS</b>	Spring 2011	Spring 2013	Spring 2015
Game Management Units: 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17			
All Units: Brown Bear Tag Fees Reauthorization of Antlerless Moose Hunts			
<b>ARCTIC AND WESTERN REGIONS</b>	Fall 2011	Fall 2013	Fall 2015
Game Management Units: 18, 22, 23, 26A			
<b>INTERIOR REGION</b>	Spring 2010	Spring 2012	Spring 2014
Game Management Units: 12, 19, 20, 21, 24, 25, 26B, 26C			
All Units: Brown Bear Tag Fees Reauthorization of Antlerless Moose Hunts			

**ALASKA BOARD OF GAME**  
Statewide Regulations Schedule

**CYCLE “A”: 2010, 2014, 2018, 2022**

**5 AAC Chapter 92 Statewide Provisions:**

- .001 Application of this Chapter
- .002 Liability for Violations
- .003 Hunter Education and Orientation Requirements
- .004 Policy for Off-Road Vehicle Use for Hunting and Transporting Game
- .005 Policy for Changing Board Agenda
- .010 Harvest Tickets and Reports
- .011 Taking of Game by Proxy
- .012 Licenses and Tags
- .013 Migratory bird hunting guide services
- .018 Waterfowl Conservation Tag
- .019 Taking of Big Game for Certain Religious Ceremonies
- .020 Application of Permit Regulations and Permit Reports
- .025 Permit for Exporting a Raw Skin
- .028 Aviculture Permits
- .029 Permit for Possessing Live Game
- .030 Possession of Wolf Hybrid Prohibited
- .031 Permit for Selling Skins, Skulls, and Trophies
- .033 Permit for Science, Education, Propagative, or Public Safety Purposes
- .034 Permit to Take Game for Cultural Purposes
- .039 Permit for Taking Wolves Using Aircraft
- .042 Permit to Take Foxes for Protection of Migratory Birds
- .047 Permit for Using Radio Telemetry Equipment
- .104 Authorization for Methods and Means Disability Exemptions
- .106 Intensive Management of Identified Big Game Prey Populations
- .110 Control of Predation by Wolves
- .115 Control of Predation by Bears
- .116 Special Provisions in Predation Control Areas
- .141 Transport, Harboring, or Release of Live Muridae Rodents Prohibited
- .165 Sealing of Bear Skins and Skulls
- .170 Sealing of Marten, Lynx, Beaver, Otter, Wolf, and Wolverine
- .171 Sealing of Dall sheep horns
- .200 Purchase and Sale of Game
- .210 Game as Animal Food or Bait
- .220 Salvage of Game Meat, Furs, and Hides
- .230 Feeding of Game
- .250 Transfer of Musk oxen for Science and Education Purposes
- .450 Description of Game Management Units
- .990 Definitions

**CYCLE “B”: 2012, 2016, 2020, 2022.**

**5 AAC Chapter 92 Statewide Provisions:**

- .009 Obstruction or hindrance of lawful hunting or trapping
- .035 Permit for Temporary Commercial Use of Live Game
- .036 Permit for taking a child hunting
- .037 Permit for Falconry
- .040 Permit for Taking of Furbearers with Game Meat
- .041 Permit to Take Beavers to Control Damage to Property
- .043 Permit for Capturing Wild Furbearers for Fur Farming
- .044 Permit for hunting black bear with the use of bait or scent lures
- .049 Permits, Permit Procedures, and Permit Conditions
- .050 Required Permit Hunt Conditions and Procedures
- .051 Discretionary Trapping Permit Conditions & Procedures
- .052 Discretionary Permit Hunt Conditions and Procedures
- .057 Special Provisions for Dall Sheep Drawing Permit Hunts
- .062 Priority for Subsistence Hunting; Tier II Permits
- .068 Permit Conditions for Hunting Black Bear with Dogs
- .069 Special Provisions for Moose Drawing Permit Hunts
- .070 Tier II Subsistence Hunting Permit Point System
- .075 Lawful Methods of Taking Game
- .080 Unlawful Methods of Taking Game; Exceptions
- .085 Unlawful Methods of Taking Game; Exceptions
- .090 Unlawful Methods of Taking Fur Animals
- .095 Unlawful Methods of Taking Furbearers; Exceptions
- .100 Unlawful Methods of Hunting Waterfowl, Snipe, Crane
- .130 Restriction to Bag Limit
- .135 Transfer of Possession
- .140 Unlawful Possession or Transportation of Game
- .150 Evidence of Sex and Identity
- .160 Marked or Tagged Game
- .200 Purchase and Sale of Game
- .260 Taking Cub Bears & Female Bears with Cubs Prohibited
- .400 Emergency Taking of Game
- .410 Taking of Game in Defense of Life or Property
- .420 Taking Nuisance Wildlife

**ALASKA BOARD OF GAME**

Revised April, 2009

<b>MEMBER'S NAME AND ADDRESS</b>	<b>TERM EXPIRES</b>
Cliff Judkins, Chairman PO Box 874124 Wasilla, Alaska 99687	6/30/2012
Ted Spraker, Vice Chairman 49230 Victoria Ave. Soldotna, Alaska 99669	6/30/2011
Ben Grussendorf 1221 Halibut Point Rd. Sitka, AK 99835	3/1/2010
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Teresa Sager Albaugh HC 72 Box 835 Tok, AK 99780	6/30/2012

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**Alaska Board of Game members may also be reached at:**

ALASKA DEPARTMENT OF FISH AND GAME

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

PHONE: (907) 465-4110 FAX: (907) 465-6094

[www.boards.adfg.state.ak.us](http://www.boards.adfg.state.ak.us)

**BOARDS SUPPORT SECTION  
Staff List**

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**Jim Marcotte**, Exec. Director II, 465-6095  
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For updated information on the progress of an ongoing Board of Fisheries or Board of Game meeting, call: Juneau 465-8901; outside Juneau 1-800-764-8901

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Website address: <http://www.boards.adfg.state.ak.us/>

**ALASKA BOARD OF GAME**  
**Spring, 2010 Proposal Book**  
**Interior Region**  
**Proposal Index**

**REGION III – INTERIOR**

1. Shorten the spring beaver trapping season for Units 20B and 20D.
2. Modify the trapping season for lynx in Units 20 and 25C.
3. Require trappers to check traps in all Region III units.
4. Establish a “no closed” hunting season for coyote in Unit 20.
5. Exempt certain areas from the provision that allows taking bear with artificial light and taking cubs in Units 19D & 24.
6. Reclassify black bear to allow trapping and the sale of hides in Units 25, 20 and 12.
7. Change the black bear baiting season for the Interior Region Units.
8. Allow guides and assistant guides to place and maintain bait stations for clients.
9. Allow guides to maintain up to ten bait stations.
10. Modify the salvage requirement for black bear in Unit 20.
11. Eliminate black bear sealing in Interior Units where harvest tickets or registration permits provide necessary harvest data.
12. Authorize resident brown bear tag fee exemptions for Region III.
13. Modify seasons and bag limits, and apply certain motorized restrictions for the Fortymile Caribou Herd; Units 20B, 20D, 20E, and 25C.
14. Revise the Fortymile Caribou Herd Harvest Plan by changing season dates, bag limits and permit conditions for Units 20B, 20D, 20E, and 25C.
15. Reduce the Fortymile Caribou Herd population objective to 45,000 to 75,000 caribou.
16. Modify season dates for Dall sheep for all Region III Units.

**TOK AREA – UNITS 12 & 20E**

17. Change the season dates for trapping lynx in Units 12 and 20E.
18. Open a fall hunting season for the Chisana Caribou Herd in Unit 12.
19. Establish a fall registration hunt for youth and individuals with disabilities in Unit 20E.
20. Increase the harvest limit for caribou in Unit 20E.
21. Apply restrictions to the Fortymile caribou permit hunt in Unit 20E.
22. Extend the moose season on certain private lands in Unit 12.
23. Reduce the number of permits for the Tok Management area for Dall sheep in Units 12 and 20.
24. Restrict nonresident hunting for moose and caribou in the Upper Yukon/Tanana predation control area in Units 12 and 20.
25. Change the description of the Ladue Controlled Use Area for Unit 20E.

**FAIRBANKS AREA - UNIT 20A, 20B, 20C, 20F, AND 25C**

26. Shorten the beaver trapping season in Unit 20B.
27. Lengthen the brown bear season in Unit 20A.
28. Allow the taking of brown bear over bait in Units 20A, 20B and 20C.
29. Allow the taking of brown bear over bait and extend the hunting season in Unit 20C.
30. Allow the taking of brown bear over bait in Unit 20C.
31. Expand the brown bear season dates for Units 20C and 20A.

32. Modify the antler restriction for moose in Unit 20A.
33. Allow the taking of moose calves in Unit 20.
34. Manage the moose hunt in Unit 20A with certain permit and registration hunts.
35. Modify the antler restrictions in Unit 20A.
36. Require nonresidents to hunt with guides or 2nd degree kindred in Unit 20A.
37. Change the muzzleloader moose season and antler restrictions for Unit 20A.
38. Modify the antler restrictions in Unit 20A.
39. Close the muzzleloader hunt in Unit 20A; open a muzzleloader hunt in Unit 20B.
40. Reauthorize the antlerless moose hunting season in Unit 20A.
41. Lengthen the resident muzzleloader season for moose in Unit 20B.
42. Reauthorize the antlerless moose hunting season in Unit 20B.
43. Allocate a number of antlerless moose permits for a youth hunt in Unit 20B
44. Eliminate antlerless moose hunts in a portion of Unit 20B.
45. Restrict the use of motorized vehicles and aircraft for hunting moose in the Minto Flats Management Area in Unit 20B.
46. Establish a community harvest permit hunt for the Village of Minto.
47. Modify the muzzleloader hunt for antlerless moose in Unit 20B.
48. Open a muzzleloader permit hunt in Unit 20B.
49. Establish an archery permit hunt for moose in Unit 20B.
50. Modify the moose season dates in Unit 20C.
51. Delay the moose season in Unit 20C.
52. Expand the moose season in Unit 20C.
53. Remove the prohibition against shooting white moose.
54. Open a muzzleloader season for antlerless moose in the Fairbanks Management Area.
55. Expand the Stampede Close Area in Units in 20A and 20C.
56. Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C.
57. Eliminate the Nenana Canyon Closed Area in Units 20A and 20C.
58. Expand the current wolf closure areas in Unit 20.
59. Expand the Nenana Canyon closed area in Units 20A and 20C.
60. Expand the Stampede Trail closed area in Unit 20C.
61. Eliminate the Stampede Closed Area for Unit 20C.
62. Establish a wolf predation control area implementation plan for Unit 20C.
63. Eliminate the Stampede and Nenana Canyon Closed Area in Unit 20A and 20C.
64. Open the Stampede and Nenana Canyon Closed Areas in Unit 20A and 20C.
65. Prohibit the taking of wolf in a portion of Unit 20C.
66. Establish an intensive management area of Unit 20C.
67. Establish a bear predation control area implementation plan for Unit 20C.
68. Established a Controlled Use Area in Unit 20A.
69. Modify the motorized vehicle restriction for the Wood River CUA in Unit 20A.
70. Allow the use of motorized vehicles for permit winners hunting in the Wood River controlled Use Area for Unit 20A.
71. Designate Creamers Migratory Waterfowl Refuge as a youth hunting and trapping area in Unit 20C.
72. Restrict the use of traps near certain recreational and residential areas in Unit 20C.

#### **DELTA JUNCTION AREA - UNIT 20D**

73. Reauthorize the antlerless moose hunting season in Unit 20D.
74. Modify the bison season dates for residents and nonresidents.
75. Allow the taking of Delta bison the same day airborne.

76. Allow radio communications to locate bison in Unit 20A.
77. Make specific radio collared bison illegal to shoot in the Delta Bison Herd.

#### **MCGRATH AREA - UNITS 19, 21A, AND 21E**

78. Eliminate the nonresident closed area for caribou Unit 19A.
79. Change registration permit and general hunt areas and season dates in 19D.
80. Lengthen the moose season for nonresidents in Unit 21A.
81. Lengthen the nonresident moose season in 21E.
82. Open a registration hunt for Dall sheep in 19C for residents.
83. Eliminate the early reporting requirement for wolves harvested in 19D.
84. Establish a predation control implementation plan in 21E.
85. Establish a predation control implementation plan in 21E.
86. Establish a predation control implementation plan in 21E.
87. Modify the aircraft restrictions for the Koyukuk Controlled Use Area in 19C.

#### **GALENA AREA - UNITS 21B, 21C, 21D, 24A, 24B, 24C, AND 24D**

88. Change the moose hunt area boundary in Unit 21B.
89. Improve flexibility to operate a check station and clarify salvage requirements: 21D and 24.
90. Open a winter moose hunt in the Kanuti Controlled Use Area for Unit 24B.
91. Open a winter moose hunt in the Koyukuk Controlled Use Area for Units 24C and 24D.
92. Clarifies and fully implements proxy restrictions for Units 21 and 24.
93. Change the Intensive Management Objectives in Unit 21B.
94. Modify the boundary of Kanuti Controlled Use Area in Unit 24B.

#### **NORTHEAST ALASKA AREA - UNITS 25A, 25B, 25D, 26B, 26C**

95. Reduce the bag limit for beaver trapping in Unit 25D.
96. Extend the ending date of the mink and weasel season in 26B and C.
97. Allow black bear snaring in Unit 25D during open seasons: 25A, 25B, and 25D.
98. Allow the harvest of any black bear in Unit 25D.
99. Shorten the nonresident season for Porcupine Caribou Herd: Units 25A, B, D, and 26C.
100. Change the resident season and bag limit for caribou in Unit 25A.
101. Modify the caribou bag limit in Unit 26B, Dalton Highway Corridor Management Area.
102. Modify the resident season and bag limit for caribou Unit 26B, remainder.
103. Modify the resident season and bag limit for caribou in Unit 26B, remainder.
104. Expand bag limit for caribou in Unit 26B.
105. Develop a management plan for the Central Arctic Herd in Units 26B and 26C.
106. Modify the salvage requirement for moose in Unit 25.
107. Open a general hunting season for moose in Unit 26C.

#### **REGION I - SOUTHEAST**

108. Reauthorize the existing antlerless moose season in Berners Bay for Unit 1C.
109. Reauthorize the existing antlerless moose season in the Gustavus area for Unit 1C.
110. Reauthorize the existing antlerless moose season in Unit 5A.

## **REGION II - SOUTHCENTRAL/SOUTHWEST**

111. Reauthorize the antlerless moose season in Unit 6A.
112. Reauthorizes the antlerless moose season in Unit 6B.
113. Reauthorizes the antlerless moose season in Unit 6C.
114. Reauthorizes the drawing permit hunts for antlerless moose in Unit 14A.
115. Reauthorize the antlerless moose season in the Twentymile/Portage for Units 7 and 14C.
116. Reauthorize the antlerless moose season in Fort Richardson Mgmt area for Unit 14C.
117. Reauthorize the antlerless moose season in the Anchorage Mgmt area for Unit 14C.
118. Reauthorize the antlerless moose season in the Birchwood Mgmt area for Unit 14C.
119. Reauthorize the antlerless moose hunt on Elmendorf Air Force Base for Unit 14C.
120. Reauthorize the antlerless portion of the any-moose drawing permit Ship Creek for Unit 14C.
121. Reauthorize the antlerless moose season in the Skilak Loop Wildlife Mgmt area for Unit 15C.
122. Reauthorize the antlerless moose season for Unit 15C.
123. Reauthorize the antlerless moose hunt on Kalgin Island for Unit 16B.
124. Reauthorize the brown bear tag fee exemptions in Region II for Unit Region II Brown bear.

## **REGION V - ARCTIC/WESTERN**

125. Reauthorize the antlerless moose seasons in Unit 23.
126. Reauthorize the antlerless moose season in Unit 26(A).
127. Reauthorize the antlerless moose seasons in Unit 22C and the remainder of 22D.
128. Reauthorize the current resident tag fee exemptions for Brown Bear; 18, 22, 23, 26A. Region V Brown Bear.

**ALASKA BOARD OF GAME**  
**Interior Region**  
**February 26 – March 7, 2010**  
**Westmark Fairbanks Hotel**  
**813 Noble Street, Fairbanks, Alaska**

**~TENTATIVE AGENDA~**

**NOTE: This Tentative Agenda is subject to change throughout the course of the meeting.**

This Tentative Agenda is provided to give a general idea of the board's anticipated schedule. The board will attempt to hold to this schedule; however, the board is not constrained by this Tentative Agenda. Persons wishing to testify must sign-up by the deadline. Public testimony will continue until those present at the meeting are heard; the board will continue working through its agenda immediately upon conclusion of public testimony. The following time blocks are only an estimate. Updated agendas will be posted in the meeting room, or call 1-800-764-8901 for a recorded message on daily progression through the meeting.

**Friday, February 26, 8:30 AM**

OPENING BUSINESS

Call to Order

Introductions of Board Members and Staff

Board Member Ethics Disclosures

Purpose of Meeting (overview)

STAFF AND OTHER REPORTS

PUBLIC AND ADVISORY COMMITTEE TESTIMONY (upon conclusion of staff reports)

**Saturday, February 27, 8:30 AM**

PUBLIC AND ADVISORY COMMITTEE TESTIMONY Continued

**THE DEADLINE FOR SIGN-UP TO TESTIFY will be announced at the meeting.** Public testimony will continue until persons who have signed up before the deadline and who are present when called by the Chairman to testify, are heard.

**Sunday, February 28, 8:30 AM**

PUBLIC AND ADVISORY COMMITTEE TESTIMONY Continued

BOARD DELIBERATIONS (Upon conclusion of public testimony)

**Monday, March 3 – Sunday, March 7, 8:30 AM**

BOARD DELIBERATIONS Continued

MISCELLANEOUS BUSINESS, including petitions, findings, resolutions, letters, other

ADJOURN

**Special Notes**

A. This agenda is TENTATIVE and subject to change during the meeting. A list of staff reports and a roadmap will be available at the meeting. Scheduled updates will be available on the board's recorded message phone. Phone Number: 1-800-764-8901; in Juneau call 465-8901.

B. Advisory Committee representatives may present their reports either at the beginning or end of the "Oral Public Testimony." The committee representative should notify the Board Support Staff whether they prefer to present their report at the beginning or end of the public testimony period.

C. The State of Alaska Department of Fish and Game complies with Title II of the Americans with Disabilities Act of 1990 (ADA). Individuals with disabilities who may need auxiliary aids, services, and/or special modifications to participate in this hearing and public meeting should contact 465-4110 no later than February 12, 2010 to make any necessary arrangements.



**REGION III - INTERIOR**

**PROPOSAL 1 – 5 AAC 84.270. Furbearer trapping.** Shorten the spring beaver trapping season in the remainder of Unit 20B and in Unit 20D as follows:

<b>Species and Units</b>	<b>Open Season</b>	<b>Bag Limit</b>
(1) Beaver		
...		
Remainder of Unit 20(B), and Unit 20(D)	<u><b>Sept. 25–May 31</b></u> [SEPT. 25–JUNE 10]	No limit.
...		

**ISSUE:** This proposal corrects an error in the regulations for the remainder of Unit 20B and Unit 20D. The Region III beaver seasons were realigned in spring 2008, and the intent was to close the season in the remainder of Unit 20B and in Unit 20D on May 31. However, a typographical error was submitted with the June 10 closure date. Since then, the Department of Fish and Game has closed the trapping seasons in the remainder of Unit 20B and in Unit 20D on May 31 to avoid unsustainable harvest and conflicts with other waterway users.

Shortening these seasons will avoid unsustainable harvest in accessible areas as well as potential conflicts with other waterway users during early June. A beaver trapping season in June could result in an unsustainable harvest in highly accessible areas such as the remainder of Units 20B and 20D near roads and popular lakes and rivers. Additionally, traps set along high-traffic river corridors would likely propagate conflicts between trappers and other water enthusiasts such as fishermen, boaters, swimmers, and floaters. Eliminating the early June beaver trapping season will likely maintain low conflict between trappers and boaters, fishermen, and other water users.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** User conflicts and overharvest will likely occur.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Beaver populations in highly accessible areas will not be overharvested and trappers will have less likelihood of running into conflicts with other waterway users.

**WHO IS LIKELY TO BENEFIT?** Trappers, viewing public, and other waterway users who wish to maintain beaver populations and avoid conflict.

**WHO IS LIKELY TO SUFFER?** Trappers who are not concerned about conflict with other waterway users.

**OTHER SOLUTIONS CONSIDERED?** Continuing to issue emergency orders to close the season on May 31.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-051

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**PROPOSAL 2 - 5AAC 84.270. Furbearer trapping.** Modify the trapping season for lynx in Units 20 and 25C as follows:

Lynx season should be December 1 – February 28. If you can legally make language to allow for incidental catch before and after these dates so be it. If not, go back to the prior regulation that if you harvest an out of season furbearer you release it if applicable or skin it and surrender it to the State of Alaska.

**ISSUE:** Lynx season in Units 20A, 20B and that portion of Unit 25C east of the Teklanika River, 20D and 25C being open for the harvest of two lynx November 1 – November 30. The season opening for trapping of two lynx was not the intent of the proposal last Board of Game meeting in Anchorage nor was any testimony of such a season. What the intention of the proposal and testimony from the Alaska Trappers Association and or their trappers was to have an incidental catch bag limit. Let me make it clear the Board of Game cannot make the regulations to please everybody, there is always some minority group to make a claim that they can use these very un-prime skins, or should be allowed to keep any incidental non-targeted furbearer that is out of season. However the majority of trappers trap to harvest the best or prime skins all regulations pertaining to seasons of trapping furbearers should be made in the best interest of the majority of the trapping community meaning when the furbearer is going into prime and just going out of prime and the management of the population.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** What has happened is now less experienced trappers are trapping for their early limit of lynx; these trappers are not setting one trap to catch a lynx or two but multiple traps and snares thus greatly increasing the odds of catching more than the two lynx bag limit especially during this time of a high lynx cycle. Defeating the whole purpose of "incidental catch" of lynx in a trap or snare not set to target lynx. We all can agree if a trapper is not targeting lynx his or her chances are greatly reduced in catching a lynx, thus the intent of "incidental catch."

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, through education a trapper can learn how not to catch or greatly decrease their chances of catching a non-target fur bearer. This will improve quality of the resource and the trapping experience, waiting 30 days does not impose on any trapper. As there are many other furbearers to target that are much closer to prime than the lynx, thus the reward will be a very nice skin to use or sell. You, as the board and us as the trapper must decide what is best for the resource and the majority of the users. This is what contributes the most to the quality of a trapping experience not just catching furbearer.

**WHO IS LIKELY TO BENEFIT?** The majority of trappers as they trap furbearers for their skin quality.

**WHO IS LIKELY TO SUFFER?** The less experienced trapper who has never caught a lynx as they cannot wait 30 days longer to fulfill that goal. Experienced trappers that wait will have a lesser quality lynx to try to harvest because road trappers or neighboring trap lines are harvesting early unprimed lynx.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Allen Barrette

**LOG NUMBER:** I-10S-G-039

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**PROPOSAL 3 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**  
Require trappers to check traps in all Region III Units as follows:

A requirement for trappers to check their traps within a 72 hour time period in the Interior Region of Alaska. The regulation would stipulate that a trapper must check dry land traps at least once with a 72 hour period of time after setting them, and remove any captured animal from the set. It could read similar to the Unit 1C regulation which states that "all traps/snares must be checked within three days of setting them and within each three days thereafter."

**ISSUE:** Alaska is one of only four states in the United States that does not have trap check time requirements for land sets (except a small area in Gustavus, Unit1C). A lack of check times is inconsistent with the Trappers Code of Ethics (Alaska Department of Fish and Game and Alaska Trappers Association) stating that trappers should "trap in the most humane way possible", and "promote trapping methods that reduce the possibility of catching non-target animals." The absence of trap check times can also lead to wanton waste (predation on trapped animals by other wildlife), or escapement from traps resulting in loose injured animals and/or wildlife seen with traps attached.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Wildlife will suffer for long periods in traps, opportunities to minimize indiscriminate kills will be missed, and wanton waste will occur when wildlife is left vulnerable to predation. Wolves roaming with traps or snares attached, like those seen in Denali National Park two years ago, could occur more frequently. These incidences increase conflicts between user groups as well as different wildlife management agencies.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. This proposal will increase the efficiency of trapping and help reduce suffering non-target kills, wanton waste and animal escaping with injuries or traps attached.

**WHO IS LIKELY TO BENEFIT?** Trappers who adhere to ethical standards. Subsistence trappers who compete with weekend and urban trappers. Wildlife advocates who appreciate humane trapping and hunting regulations.

**WHO IS LIKELY TO SUFFER?** Trappers who do not care about humane trapping methods. Weekend trappers who may not be fully committed to the Trappers Code of Ethics. The trapping industry as a whole.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Karen Deatherage

**LOG NUMBER:** HQ-10S-G-028

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**PROPOSAL 4 - 5 AAC Hunting seasons and bag limits for small game.** Establish a “no closed” hunting season for coyote in Unit 20 as follows:

Unit 20: Ten coyotes per day...**no closed season** [AUGUST 10 - APRIL 30].

**ISSUE:** Over-population of coyotes.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Expanding predation on Dall sheep lambs.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. Helps to strengthen recruitment of the Dall sheep population.

**WHO IS LIKELY TO BENEFIT?** Consumptive/non-consumptive users of the Dall sheep population.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Brent Keith

**LOG NUMBER:** HQ-10S-G-018

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**PROPOSAL 5 - 5 AAC 92.080 (7)(C)(iv) Unlawful methods of taking game; exceptions & 92.260 Taking cub bears and female bears with cubs prohibited.** Exempt certain areas administered by the National Park Service from the provisions that allow taking bear with artificial light and taking cubs as follows:

Consistent with other methods and means exceptions, such as in 5 AAC 92.080(4)(B)(iii), the words, “except on any National Park Service administered areas could be inserted into these regulations.

The new regulations would read:

**5 AAC 92.080. Unlawful methods of taking game; exceptions.**

**(7)(C)(iv)** Artificial light may be used by a resident hunter taking black bear under customary and traditional use activities at a den site from October 15 through April 30 in Unit 19A, that portion of the Kuskokwim River drainage within Unit 19D upstream from the Selatna River drainage and the Black River drainage, and in Units 21B, 21C, 21D, 24 and 25D, **except on any National Park Service administered areas.**

**5 AAC 92.260. Taking cub bears and female bears with cubs prohibited.**

A person may not take a cub bear or a female bear accompanied by a cub bear, except that a black bear cub or a female black bear accompanied by a cub may be taken by a resident hunter from October 15 through April 30 under customary and traditional use activities at a den site in Unit 19A, that portion of the Kuskokwim River drainage within Unit 19D upstream from the Selatna River drainage and the Black River drainage, and in Units 21B, 21C, 21D, 24, and 25D, **except on any National Park Service administered areas.**

**ISSUE:** During the Board of Game’s 2008 Southeast Region meeting it authorized an exception to the prohibition of taking game with the aid of artificial light when it authorized the use of artificial light to take black bears (including sows with cubs and cubs) under customary and traditional use activities at den sites from October 15–April 30 in Unit 19A, portions of 19D, and Units 21B, 21C, 21D, and 24 and 25D. The proposals that initiated these regulations had been previously deferred and were taken up at the Southeast meeting; the National Park Service (NPS) did not immediately recognize that NPS lands were affected and consequently did not comment. When the regulation was promulgated NPS identified small portions of two National Preserves in Units 19D and 24 that were included in this authorization.

The NPS requests that those portions of Units 19D and 24 within the Denali National Preserve and the Gates of the Arctic National Preserve excepted from these allowances for the following reasons:

1. Sow with cubs and cub harvest provision: The written finding of the Board of Game (2006-164-BOG, General Bear Management) is to protect sows and cubs from harvest, “unless it is necessary to consider methods to increase bear harvest as a part of a bear predator control program” (see pages 4-5). Given this understanding, NPS considers this regulation as predator control/intensive management and, therefore is not compatible with NPS management objectives. We request the Board of Game exempt NPS Preserves from these activities as has been done with all other predator control programs.
2. Artificial light provision: Use of artificial light for harvest, with few exceptions, is prohibited on the vast majority of lands in Alaska, including all NPS administered lands. NPS Preserves are managed for a variety of values and purposes, including consumptive uses of wildlife as well as other uses. Because of these multiple mandates which occasionally conflict with state wildlife

management, these areas should continue to be excluded from the use of artificial light. Our review of the State's Customary and Traditional Use Overview, presented to the Board of Game in Record Copy (RC) 45, 46, & 47, did not indicate the use of artificial light as a part of a documented traditional practice. We understand that the board heard testimony that convinced it to make this exception for these areas. We request use of artificial light not be allowed within those portions of Units 19D and 24 within Denali National Preserve and Gates of the Arctic National Preserve, particularly since no such traditional subsistence proposal has been submitted for evaluation through the processes established in Title VIII for federal areas.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Portions of the Denali National Preserve and Gates of the Arctic National Preserve would be subject to a method of take that is incompatible with NPS laws and policies which would require the NPS to propose restrictions resulting in additional/overlapping hunting regulation.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Hunters in these portions of Units 19D and 24 within Denali National Preserve and Gates of the Arctic National Preserve would benefit by minimizing potential confusion between state and federal regulations.

**WHO IS LIKELY TO SUFFER?** It does not appear those portions of Units 19D and 24 within Denali National Preserve and Gates of the Arctic National Preserve were identified by the proponents as areas where they proposed to hunt. State harvest records reflect little, if any, black bear harvests in these remote areas of the Game Management Units and no similar authorizations were sought in Park or Preserve areas through the respective NPS Subsistence Resource Commissions(s).

**OTHER SOLUTIONS CONSIDERED?** The NPS would prefer to have the issue addressed by the Board of Game rather than pursue separate federal regulatory processes which could increase the potential for confusion among hunters.

**PROPOSED BY:** Superintendents of Denali National Park & Preserve and Gates of the Arctic National Park & Reserve

**LOG NUMBER:** HQ-10S-G-030

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**PROPOSAL 6 - 5 AAC 92.990(7)(C)(iv). Definitions; and 92.200. Purchase and sale of game.** Reclassify black bear to allow trapping and the sale of hides in Units 25, 20 and 12 as follows:

Declare the black bear a furbearer under statewide regulations for Units 25, 20, and 12.

**ISSUE:** Currently there is a loss of opportunity to harvest black bears in the Eastern Interior Region. High rates of bear predation will continue to limit moose and caribou populations in important hunting areas especially in the Eastern Interior Region.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The opportunity to harvest plentiful black bears will remain limited to hunting seasons. Black bear populations are abundant and will keep moose and caribou populations below their management objectives.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Passage of this proposal will help reduce black bear populations to a better management level thereby allowing moose and caribou populations to rebound to healthier levels. Being listed as a furbearer will allow harvesters to sell the hide thereby becoming economically for trappers to target high density black bear areas.

**WHO IS LIKELY TO BENEFIT?** All trappers and hunters would benefit by maximizing what the land has provided them. *Note:* This proposal was an action item of the Eastern Interior Regional Advisory Council during its public meeting in October 2009 in Fort Yukon, Alaska.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Eastern Interior Alaska Subsistence Regional Advisory Council

**LOG NUMBER:** HQ-10S-G-004

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**PROPOSAL 7 - 5 AAC 92.0044. Permit for hunting black bear with the use of bait or scent lures.** Change the black bear baiting season for Units 12, 19, 20, 21, 24 and 25 as follows:

Black bear baiting season is April 1 or March 25th – to June 30.

**ISSUE:** The start of black bear baiting season is too late. The season needs to be opened earlier by at least two weeks. By April 15, the river and lake ice is too rotten to safely cross to access a bait site. By the time the ice goes out and the river ice clears out so it is safe to navigate, the early prime time is over. The effect of an April 15 date is a shorter time frame for prime time black bear hunting. Allowing the baits to be placed earlier; they will be active sooner and ready to go when the ice goes out

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The actual spring prime time bear hunting will continue to be shorter. Some areas will continue to not be accessed due to logistics and cost. And the moose in those areas will not have any bear control.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The earlier a bait is placed then the earlier it will be hit and the better shape the bears hides will be in.

**WHO IS LIKELY TO BENEFIT?** All bear hunters who have to traverse rivers and lakes to place a bait will now have the option to place baits by snow machine safely.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Opening the season March 15. It would be even safer then but maybe needlessly too early.

**PROPOSED BY:** Don Duncan.

**LOG NUMBER:** HQ-10S-G-038

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**PROPOSAL 8 - 5 AAC 92.044 Permit for hunting black bear with the use of bait or scent lures.** Allow guides and assistant guides to maintain bait stations for clients for Units 12, 19, 20, 21, 24 and 25 as follows:

There should be an exception for guides as follows: except a registered guide who is licensed for the Unit and has picked the guide use area may register a contracted client's bait station and may establish, maintain and remove the bait on behalf of the client. When the guide is registering a client's bait station permit; the guide must show proof of the client contract, a copy of the client's hunting license and big game tag if needed and proof of bear baiting class for both the client and guide if required. The guide would be legally responsible for the bait in addition to the client.

**ISSUE:** The black bear baiting requirements need to be changed to allow a registered guide and assistant guides to place, maintain and remove a contracted hunter's bait. A guide is only allowed two baits per permit. The current requirements are needlessly costly and those costs make an Alaska guided hunt non-competitive with other areas.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The cost of a guided hunt will remain high. Hunters will go elsewhere. The State of Alaska will lose the benefit of having guides and their clients keep the black bear populations in check.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Allowing the guide to have the bait ready before the clients arrive will increase the odds that the client will have enough time to be more selective thereby effectively getting better and bigger bears. It will also allow the guide to handle more hunters in the prime time before the bears get rubbed.

**WHO IS LIKELY TO BENEFIT?** Guides and the hunters they serve will benefit. A side benefit is conferred to the State and moose hunting public by keeping black bear populations under control.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** The problem could be solved by allowing registered guides to establish more than two baits. In the past, the Board of Game has been reluctant to grant guides more baits than the general public.

**PROPOSED BY:** Don Duncan.

**LOG NUMBER:** HQ-10S-G-039

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**PROPOSAL 9 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.** Allow guides to maintain up to ten bait stations for Units 12, 19, 20, 21, 24 and 25 as follows:

The regulations should read...except a registered guide who is licensed for the area and has currently picked the area can get up to ten black bear bait permits.

**ISSUE:** A guide who is serving the public is restricted to only registering two baits. This requires the guide to hire numerous assistant guides just to get the permits. It drives the cost up to the point where hunters go to Canada and elsewhere.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Alaska will continue to lose an effective tool when trying to control the black bear populations. The State of Alaska will keep losing license and tag fees of hunters that choose to go elsewhere. Black bear hunts are minimally profitable and are sometimes subsidized by the guide operation. That may not continue and the moose populations will suffer

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** More baits established during the prime baiting time will allow the guide and hunters to be more selective and thereby increasing the quality of the harvested resource.

**WHO IS LIKELY TO BENEFIT?** Guides and their clients and the moose hunting public.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** I also made an alternate proposal that would allow the guide to register, place, maintain and remove bait on behalf of the client. Either this proposal or my alternate proposal should be passed.

**PROPOSED BY:** Don Duncan

**LOG NUMBER:** HQ-10S-G-040

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**PROPOSAL 10 - 5 AAC 92.220(a)(4). Salvage of game meat, furs, and hides.** Modify the salvage requirements for black bear in Unit 20 as follows:

From January 1 - May 31, in Units 1 - 7 . 11 - 17 and 20 the hide, skull and meat must be salvaged and removed from the field.

From June 1 - December 31, the **skull and either the hide, or meat or both** [the hide and skull] must be salvaged and removed from the field in Unit 20. Edible meat as defined by 5AAC 92.999.

**ISSUE:** Many hunters wish the choice of salvaging meat or hide on a summer or fall black bear. The current regulation requires the salvage of a summer hide that may or may not be worth time to save.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunters that hunt for meat will continue to be required to carry seriously rubbed or thin hide out to be sealed when there is not a particular need for it. The requirement to salvage the hide off a summer bear but not the meat is irrational at best. The Interior bears of Alaska are typically excellent table fair and are hunted for that purpose. Hides harvested after the middle of June are typically thin and rubbed devoid of all trophy value. Bears in the fall are typically harvested by many moose and caribou hunters as incidental take. For that generous portions of healthy, berry fed fat meat. Under the current salvage requirements hunters are required to salvage and seal the hide that could spoil over the term of a long hunt if salt is not carried along. And the value of the hide is soon lost. Hunters that manage to get hide out in the summer and warm fall months still of value, have at times difficulties in giving away that hide for use by another. And tanning of even a small black bear can cost several hundred dollars.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** It does, Interior bears are typically devoid of all the nasty fishy issues associated with summer bears, and are harvested as the opportunity allows year round. The ability to harvest a bear with a questionable or useless hide on a hot day strictly for the meat allows the hunter to concentrate on that priority salvage. The skull is the primary use of biological data and will still be sealed and data collected.

**WHO IS LIKELY TO BENEFIT?** All meat hunters will benefit, and the sealing biologist will benefit. By not having blown or hair slipping hides to seal. The biologist will have to measure the skull, pull a tooth and attach a seal. The use of harvest tags statewide now also provides a tracking method of harvest data.

**WHO IS LIKELY TO SUFFER?** Taxidermist may suffer some labor in wages by having few hours on worthless hides.

**OTHER SOLUTIONS CONSIDERED?** I have not considered any other solutions as this is a minor change in the standard procedure for many hunters. Hide or meat requirements are already in place in Units 9, 10, 18, 19 (except 19D) and 21 - 26.

Unit 20 is not a coastal region with few areas the bears may get into fish or other summer contaminates thus the choice of matter.

**PROPOSED BY:** Vince Holton

**LOG NUMBER:** HQ-10S-G-026

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**PROPOSAL 11- 5AAC 92.165. Sealing of bear skins and skulls.** Eliminate black bear sealing in Interior Game Management Units where harvest tickets or registration permits provide necessary harvest data as follows:

(a) Sealing is required for brown bear taken in any unit in the state, black bear of any color variation taken in Units 1 - 7, **11, 13–17, and 20B** [11 - 17, 19(D), AND 20], and a bear skin or skull before the skin or hide is sold. A seal must remain on the skin until the tanning process has commenced. A person may not possess or transport the untanned skin or skull of a bear taken in a unit where sealing is required, or export from the state the untanned skin or skull of a bear taken anywhere in the state, unless the skin and skull have been sealed by a department representative within 30 days after the taking, or a lesser time if requested by the department, except that

...

[ (4) IN UNIT 19(D), BLACK BEAR TAKEN IN UNIT 19(D) OUTSIDE OF THE WOLF PREDATION CONTROL AREA DESCRIBED IN 5 AAC 92.125(F) IS NOT REQUIRED TO BE SEALED; HOWEVER, THE HIDE OF A BLACK BEAR TAKEN FROM JANUARY 1 THROUGH MAY 31 IN UNIT 19(D) OUTSIDE OF THE WOLF PREDATION CONTROL AREA MAY NOT BE TRANSPORTED FROM UNIT 19 UNTIL SEALED; ]

...

(b) A person who possesses a bear **taken** in a unit where sealing is required shall keep the skin and skull together until a department representative has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin. The department may require that the skull of the bear be skinned and that the skin and skull not be frozen at the time of sealing.

...

**ISSUE:** Both harvest tickets and sealing are required in Interior Alaska Game Management Units 12, 19D, and 20. Information obtained from harvest ticket reports alone is sufficient to guide management of black bear populations in all these Interior units, except Unit 20B, because harvest rates are low (estimated 0.2 percent–7 percent). Research indicates the estimated maximum sustainable harvest rate for Interior black bear populations may be approximately 12 percent, well above these harvest rates. Now that harvest tickets are required, sealing data is a redundant and unnecessary requirement in Units 12, 19D, 20A, 20C, 20E, and 20F.

In Unit 20B, the sealing requirement would be retained because of a relatively high harvest rate. We estimated that 11–18 percent of the black bear population was taken annually, and harvest was 12 percent or higher for 14 of 18 regulatory years during 1989–2006. However, no

perceptible change in bear size, age, or sex was noted, suggesting the Unit 20B black bear population is not being overharvested. Data collected during sealing, in addition to harvest ticket data, will allow the department to continue closely monitoring the Unit 20B population for indications of over-harvest. Changes to seasons and bag limits will be proposed if necessary.

If this proposal is adopted, only hides and skulls from Interior black bears taken in Unit 20B must be sealed within 30 days. Black bears taken in all other Interior Alaska units will only need to be sealed if the hunter sends them outside the state (e.g. for tanning) or the hunter wants to get a legal sale tag when a bear is taken in an active predation control area.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunters will be burdened by unnecessary sealing requirements in some Interior Units.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Department of Fish and Game staff will be able to provide hunters with streamlined hunt reporting mechanisms.

**WHO IS LIKELY TO BENEFIT?** Hunters.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Remove the sealing requirement for Unit 20B black bears and a) require hunters to surrender the lower jaw of black bears taken in Unit 20B so the department can take a tooth for aging, or b) require hunters to provide a premolar tooth for aging. Most hunters will not have the expertise or tools to extract the tooth with the root entirely intact. Damage to the jawbone (detrimental to the hunter's trophy), or inadequate or no samples submitted (no age data collected) are the most likely results.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-050

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**PROPOSAL 12 - 5 AAC 92.015. Brown bear tag fee exemptions.** Authorize new resident brown bear tag fee exemptions throughout Interior and Eastern Arctic Alaska, including reauthorization of current resident tag fee exemptions as follows:

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) **Units 12, 19, 20, 21, 24, 25, 26B, and 26C** [UNIT 19(A) AND UNIT 19(D);]

[(5) UNIT 20(D);]

[(6) UNIT 20(E), THAT PORTION OUTSIDE OF YUKON-CHARLEY RIVERS NATIONAL PRESERVE;]

[(7) UNIT 21(B), UNIT 21(D), AND UNIT 21(E);]

...

[(10) UNIT 25(C) AND UNIT 25(D).]

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

...

[(5) UNITS 19(A) AND 19(B), THAT PORTION DOWNSTREAM OF AND INCLUDING THE ANIAK RIVER DRAINAGE;]

[(6) UNIT 21(D);]

...

[(9) UNIT 24;]

...

**ISSUE:** Resident brown bear tag fees were put in place statewide during the mid 1970s to discourage incidental harvest, elevate the status of brown and grizzly bears to trophies, and to provide revenue. Today, Region III populations are healthy, grizzly bears are highly regarded as trophies, and revenue can be generated from non-tag fee sources. The board must annually exempt all resident tag fees, and legislative action is needed to change this requirement. We are working on solutions to alleviate potential lost revenue.

Eliminating resident grizzly bear tag fees throughout Interior and Eastern Arctic Alaska (Region III) simplifies regulations, increases hunter opportunity, and is not likely to cause declines in these grizzly bear populations. This proposal would assist with our objective of managing Region III grizzly bear populations for hunter opportunity and would allow more hunters to take grizzlies opportunistically. During regulatory years 2006–2008, 37 percent of grizzlies harvested by resident hunters in Region III were taken incidentally to other activities (compared to 12 percent incidental take in regions I and II).

We estimate that a kill rate of about 6 percent, composed primarily of males, is sustainable. Human-caused mortality in most of Region III has been consistently below this level, indicating that possible increased harvest in most units can be accommodated with little effect on grizzly bear populations. Where harvests are elevated (i.e. Units 20D, 20B, 20A, and portions of 26B), grizzly populations are managed through changes in seasons and bag limits. Tag fees appear to have little effect on harvest in these areas and recent tag fees exemptions in Interior units have been followed by moderate increases to slight decreases in harvest.

As part of this request to exempt the grizzly tag fee throughout Region III, we recommend that the board, at a minimum, continue to reauthorize the current tag fee exemptions in Units 19A, 19D, 20D, 20E (that portion outside Yukon–Charley Rivers National Preserve), 21B, 21D, 21E, 25C, and 25D; and reauthorize the current tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Harvest opportunity will continue to be lost and hunters must continue to obtain the \$25 resident tag. Subsistence users in areas where tag fees are currently exempt will find it more difficult to harvest grizzly bears for food.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, will be able to opportunistically and legally harvest grizzly bears.

**WHO IS LIKELY TO SUFFER?** People who believe the \$25 resident tag fee is useful in managing grizzly bear populations and those who believe grizzly bears should not be harvested to provide food for subsistence hunters.

**OTHER SOLUTIONS CONSIDERED?** Decrease the Region III grizzly tag fee to \$10. This would require legislative action.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-077

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**PROPOSAL 13 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Modify seasons and bag limits, and apply certain motorized restrictions for the Fortymile Caribou Herd, Units 20B, 20D, 20E, and 25C as follows:

The 2006 - 2012 Fortymile Caribou Herd (FCH) Harvest Plan needs to be revised.

One aspect of any possible solutions the Board of Game (board) considers, that Alaska Backcountry Hunters would like to address and stress at the outset, **is the real need to provide reasonable hunting opportunities for youth hunters and families.** Hunter recruitment is an ongoing and important concern of the hunting community in general, and with an ever-earlier start to the school year in Alaska, we should not continue to reduce hunt opportunities for youth and families by starting hunts later in the season (after the August 20 start of the school year) as overall solutions to any problems. Doing so only further cuts into future hunter recruitment and the important bonds many families create by sharing time in the field together, which are wrapped around hunting and harvesting.

Another concern we have is the continued allowance of nonresident hunting opportunity of the FCH. Since the FCH is currently under Intensive Management and an ongoing predator control plan to grow the herd to IM population objectives, and since we continue to have harvests that exceed the quota, cut into the time it takes to re-grow the herd to the minimum that exceed the quota, cut into the time it takes to re-grow the herd to the minimum IM population goal, as well as restrict resident winter hunt opportunities, we see no reason to continue to allow nonresident

opportunity in all zones until the herd reaches the minimum IM population goal of 50,000 animals.

Currently, according to Alaska Department of Fish and Game (department), nonresident hunters take 8-11 percent of the fall FCH harvest. And most of that harvest occurs in Zone 2. We understand the economic realities involved, and that various air-taxis and local businesses benefit by allowing non-resident opportunity in Zone 2, and that typically the Zone 2 fall registration hunt is of a longer duration and much greater quality. (However, in Regulatory Year (RY) 2008 the Zone 2 harvest was exceeded by 39 animals.) We also understand the economic realities of how the Division of Wildlife Conservation is funded primarily with non-resident license and tag fees. And we are also sympathetic and very cognizant of the social need and desire to allow non-resident hunting opportunities for our non-resident brethren, and for some resident hunters to share a hunt experience in Zone 2 with non-resident friends and family.

But the fact that the Board of Game has allowed, and still allows, non-resident hunting opportunity of a caribou herd below the minimum IM population objective, and a herd that continues to see overharvests (that non-residents are a part of) that restrict resident hunting opportunities, doesn't seem to jibe with how we publicly justify our predator control implementation plans as being about putting food on the tables of Alaskans.

#### Solutions and Rationale

RY 2010, RC860, Zones 1 & 3, bull or cow: **Residents only, non-motorized-only August 10-14, motorized access allowed August 15 – September 30.**

The 2006 – 2012 FCH Harvest Plan offers specific preferred solutions to problems that arise when caribou are close to roads or there is potential for overharvests: “*Preferred methods are to temporarily close a specific drainage or other easily-delineated broader area, **make such an area walk-in only**, or delay a hunt opening.*” [our emphasis]

Restricting the early part of the Zones 1 and 3, RC 860 hunt to non-motorized only for five days conforms to a preferred method in the Harvest Plan to help solve the problems we continually face with overharvests, not only when caribou are within the right-of-way of the road(s), but when large numbers are easily accessible via unrestricted motorized access.

An early non-motorized hunt, in conjunction with adequate department information on herd locations, also allows assurance that a hunt of longer duration and quality will take place for those that desire that type of hunt. Both federally-qualified subsistence users and those not qualified should have to abide by this new regulation. department can still monitor the movements and location of the FCH prior to the hunt and if the herd is within the right-of-way of the road and/or there are concerns of overharvests during a non-motorized-only hunt, the hunt can still be postponed.

A non-motorized-only August 10 early hunt start date, with allowance for motorized access to begin on August 15, allows for youth/family hunts for both types of hunts, non-motorized and motorized, and is the most viable compromise that would provide continued opportunity for all

user-groups, and still allow youth/family opportunity for all before the August 20 beginning of the school year.

With adequate herd location information prior to the hunt opening, it is highly unlikely harvest quotas would be approached, let alone exceeded, prior to August 15 when motorized access would be allowed. With five extra days to monitor herd movements and location, and receive any harvest reports from hunters, the department could also better gauge how the motorized hunt would potentially impact harvest quotas being reached, and better plan any possible closure accordingly so that a winter hunt can still take place.

Regarding continued allowance of cow harvests: while going to a bull-only hunt may help to slow down harvests and prevent exceeding the 25 percent cow caribou harvest allocation, a bull-only hunt during the competitive and crowded motorized hunt would likely lead to making criminals out of many ethical hunters who make mistake an antlered cow caribou for a bull in August. And mandating bull-only for the non-motorized portion of the hunt is problematic in several aspects. The department should still encourage harvest of bulls, and there are various educational means we can use to better inform hunters on how to tell the difference between cows and bulls.

RY 2010-2012 RC860 Zone 2, **bull only**: Residents August 10 – September 30; Nonresidents August 10 – September 20.

Since Zone 2 is predominantly a fly-in and boat-in/float hunt, with much less competition and hunter numbers, and since the Zone 2 hunt typically has a much longer duration, going to bull-only for this zone for residents makes sense. Hunters have more time, and thus more patience, to determine gender. While we still question allowing non-resident opportunity until the FCH reaches the minimum IM population objective, we understand there is strong support for continuing to allow it in the Zone 2 roadless area where most of the nonresident bull-only harvest takes place.

RY 2011-2012 RC 860 Zone 3: August 10 – September 30, **residents only, restricted motorized access.**

We recommend that the department work next year to define and designate certain trails in Zone 3 that motorized users must stay on, otherwise the problems we have now with ATV abuse and conflicts and overharvests will only continue to be exacerbated.

Unrestricted motorized access by hunters has led to a significant amount of habitat degradation in the areas west of Chicken in particular. This happens with both the caribou and moose hunts. Riders now cross the Dennison, and Mosquito Fork of the Fortymile, and the newer machines and skill of riders is leading to evermore trails being blazed dozens of miles farther west along every ridge and down into every valley. Hunters using ATVs now access what were once remote bush airstrips, rivers that in the past were only accessible to float-hunters and areas that were once important refugia for game.

This is the exact primary “concern” mentioned over five years ago now in the department management report for this region, yet we have done nothing to confront and deal with this growing problem.

If we work now to place **reasonable** limits on motorized access in the future, it will slow harvests, allow for a longer duration and more high-quality hunt for everyone, reduce conflicts and habitat damage and loss of refugia for game, and help sustain maximum hunting opportunities for all in the future. But if we delay in confronting and dealing with this ongoing problem and wait until a future tipping point that will surely come, we will end up with reduced general hunt opportunities for all and/or possible loss of motorized access altogether.

This should also be considered for areas in Zone 1.

**ISSUE:** The current Fortymile Caribou Herd (FCH) Harvest Plan and hunt conditions. Unlimited numbers of both residents and nonresident hunters, with unrestricted means of access, are allowed opportunity to participate in the FCH fall registration hunt (RC860) in all zones, and in Zones 1 & 3 especially, this has created a myriad of problems:

- Overharvests that exceed the allowable quotas
- Emergency Closures
- Crowding and "Combat Hunting" Scenarios
- Safety Issues
- Wounding Losses
- Widespread ATV Abuse

All of these problems greatly undermine hunt duration and quality of the hunt, and lead to conflicts with other groups. Overharvests contribute to a longer time frame in which to rebuild the herd, and also reduce reasonable resident hunting opportunity by shutting down any winter hunts important to Alaskan hunters wanting to put healthy caribou meat on the table.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Continued overharvests and loss of hunt-quality and duration, continued safety issues, crowding issues, wounding losses, ATV abuse issues, user group conflicts, and loss of Alaska resident hunting opportunity.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. Risk of overharvests will be curtailed, and slowing things down with a less crowded, early non-motorized-only hunt, will also likely help with wounding losses caused by the type of unethical hunter behavior we see in a short-duration, crowded “combat hunt” scenario. All user-groups will still retain the opportunity for a youth/family hunt prior to the start of the school year, and all hunters will retain the opportunity for a caribou hunt prior to most planned moose hunts.

**WHO IS LIKELY TO BENEFIT?** All those who wish to retain opportunity for youth/family hunts before the school year begins. All those who wish to retain opportunity to hunt caribou before most moose seasons begin. All who desire a more high-quality and longer-duration hunt. All residents who want to retain opportunity for a winter hunt. All who don’t want an August 10 hunt start date to go to draw-only.

**WHO IS LIKELY TO SUFFER?** Nonresident hunters who wish to participate in the Zone 1 & 3 hunts. Resident hunters in Zone 2 who want to harvest cows. Motorized users who feel an early non-motorized-only hunt is unfair. Motorized users who in future don't want any reasonable limits placed on motorized access for hunting.

**OTHER SOLUTIONS CONSIDERED?** 1) Moving to a later start date of the hunt in Zones 1 & 3, when the FCH isn't typically as close to the road(s), in order to minimize risk of overharvests, that might also coincide with, or run close to, most moose seasons, ostensibly also reducing hunter numbers because many hunters would be after moose in other areas: Rejected because a) it diminished youth/family hunt opportunity because children would already be in school, and b) Alaska Wildlife Troopers expressed concerns they did not have the manpower to adequately provide the necessary enforcement presence once moose season begins in other areas. Area biologist in Tok also expressed that adequate enforcement is a necessary aspect of good wildlife management.

2) Bull-only hunt for residents in all Zones to curtail overharvests in general, and overharvests of cows in particular, and possibly slow down harvests: Rejected because of the difficulty many hunters have in differentiating between cow and bull caribou, the competitive nature of the short-duration hunt in the roaded zones, potential problems for enforcement personnel, and making criminals out of too many ethical hunters who mistakenly shoot a cow.

3) Draw-only for an August 10 hunt beginning RY 2011, with a very limited number of permits available: Rejected because it diminished opportunity greatly for too many, including youth/families, who wanted opportunity to hunt caribou earlier in August.

Weapons Restrictions: various scenarios with weapons restrictions for Zones 1 & 3 were considered, bow-and-arrow and muzzleloader only, and were rejected because they didn't adequately provide for maximum youth opportunity.

August 10 start date but only for federally qualified subsistence users. Later August start date for registration hunt: Rejected because while it provided ample subsistence opportunity, and would likely prevent an overharvests at that time, it cut into youth/family opportunity for too many others who aren't qualified under subsistence regulations.

Limiting the number of registration permits available in order to curb crowding, conflicts, habitat degradation, and overharvests. No online registration, in-person application only at certain locations and times, or: half available online, half only available in person at designated locations and times: Rejected because the department said it is not feasible for them to do this with what would still be a high-volume allotment of permits.

**PROPOSED BY:** Alaska Chapter Backcountry Hunters & Anglers

**LOG NUMBER:** I-10W-G-044

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**PROPOSAL 14 - 5 AAC 85.025. Hunting seasons and bag limits for caribou, and 92.052. Discretionary permit hunt conditions and procedures.** Revise the Fortymile Caribou Herd Harvest Plan by changing season dates, bag limits and permit conditions for Units 20B, 20D, 20E, and 25C as follows:

Under discretionary permit hunt conditions and procedures 5 AAC 92.052(7), (10), (12), (17), and (21), the Department of Fish and Game shall implement the following changes to the Fortymile caribou registration hunt (RC860):

In Zone 1 (portions of Units 20B and 25C accessible from the Steese highway and Chena Hot Springs Road) and Zone 3 (portions of Unit 20E accessible from the Taylor Highway).

Residents: Shorten the season to August 29<sup>th</sup> – September 30<sup>th</sup> from August 10 September 30, and change the bag limit from one caribou to one bull.

Nonresidents: Shorten the season to August 29<sup>th</sup> – September 20<sup>th</sup> from August 10 – September 20<sup>th</sup>. The bag limit will remain one bull.

In Zone 2, the roadless area between the Steese and Taylor Highways in parts of Units 20B, 20D, 20E, and 25C.

Residents and nonresidents: The season will remain August 10 – September 30 for residents and August 10 – September 20 for nonresidents, the resident bag limit will be changed from one caribou to one bull, the nonresident bag limit will remain one bull.

In addition, the department shall implement temporary closures and weapons restrictions in specific areas where the harvest management problems occur and to reduce heavy roadside harvest. Furthermore, under the Fortymile caribou seasons in the hunting regulations booklet, wording should be added stating “Hunt subject to delayed opening, weapons restrictions or cancellation on short notice. Call Fortymile hotline (267-2310) before departing for the field.”

The Board of Game, Advisory Committees, and hunters need full disclosure on the effects of each requested action. To answer the concern of state hunters who believe that federally qualified hunters may take the full fall quota of 480 caribou before the state season opens, the coalition (which has three members on the Eastern Interior Regional Advisory Council- EIRAC) recommends using the place-holder federal proposal (WP10-105) to ask for a maximum number of caribou “to be announced” before the season, but not to exceed 100 caribou, that can be taken by federally qualified hunters on federal land between August 10 and August 29. Also they will ask the federal board to consider a “bulls only” season in the fall so that the federal and state hunts can continue a joint permit. The fall state hunt quota would provide approximately 400 caribou for Zones 1 and 3.

**ISSUE:** Changes are needed to the 2006-2012 Fortymile Caribou Herd Harvest Plan to improve season openings and closings for the fall hunt and improve field conditions caused by overcrowding and hunting of large groups of caribou close to the road systems. The recent short duration of the fall hunt near the Steese and Taylor Highways has resulted in hunting conditions that the plan (approved by the Board of Game and the Federal Subsistence board) directs the

department to avoid. The approved plan should be changed only as necessary to clarify the Board's intent for the department's management strategy. The department should manage more conservatively within the options available in the plan.

Early hunt closures for the Fortymile Caribou Herd have become common place in the last five years, with seasons often lasting less than four days. In addition, the harvest has exceeded the annual quota set in the plan on several occasions. This proposal should help the harvest management and provide hunters a longer fall season.

The primary goal for the Fortymile Caribou Herd is herd growth. The annual quota in the plan is set at a conservative level to achieve this goal. Overharvest will slow potential growth.

Harvest management is difficult during early August when negative cover, herd dispersal, and segregation of bulls from cows (only cows are radio collared) makes herd monitoring difficult. In areas near the road system (Zone 1, accessible from the Steese Highway and Zone 3, accessible from the Taylor Highway) it is critical to assess caribou numbers to accurately predict harvest to ensure quotas are not exceeded. During fall 2009, harvest management was ineffective during early August because of the aforementioned factors, which resulted in the entire annual quota being taken in only three days in Zones 1 and 3. This caused the cancelation of the winter season. The plan is not due for revision until 2012, and we need to regain control of the harvest before 2012.

The best solution for managing for a longer season is to begin the season later in August when caribou are not scattered in smaller groups. Radio tracking the movements of the herd will more effective.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunt closures by Emergency Order will remain common place; the risk of exceeding the harvest quota will remain high, which could affect herd growth; and seasons could continue to last only a few days or be cancelled, bring about the loss of opportunity. Hunters will be subject to field conditions that the approved plan directs the department to avoid. The Fortymile Caribou Herd harvest will lose its almost unique ability to provide joint use of permits and management structure for both state and federal hunts.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. The risk of overharvesting in August will be reduced when the herd is often concentrated near roads and harvest management is difficult as mentioned previously. By maintaining harvest levels within the quota, the goal of herd growth will more likely be achieved. Opening the hunting season later in August, when the herd is generally less concentrated near the roads, should allow for more effective harvest management and longer, more predictable seasons, with fewer cancelations. August 29<sup>th</sup> was a date picked deliberately to reduce hunting pressure and thereby disperse the harvest over time.

Minimal changes are being suggested because the plan is still in effect, and is for the most part working successfully. When the plan is revisited in 2012, it is the desire of the coalition to retain the parts of the plan that are successfully working such as the joint federal-state permits and the fall and winter zone quotas.

**WHO IS LIKELY TO BENEFIT?** All users should benefit through effective harvest management which will afford better hunting conditions and conservation of the herd. Fewer early season closures and cancelations will allow for more predictable seasons and additional opportunity to hunt Fortymile caribou. Alaskan hunters who would both like to harvest a caribou close to the road system and still have reasonable access and good hunting conditions will benefit. A bulls only bag limit in the fall will reduce the “flock shooting” that has become prevalent and should result in a decrease in wounding loss. The accidental cow loss will probably be less than the wounding loss now experienced with “flock shooting.”

**WHO IS LIKELY TO SUFFER?** Those who will suffer could be people who have traditionally hunted Fortymile caribou in mid-August and hunters who prefer to harvest cows during the fall hunt. Others who could suffer are those who might have to choose between going caribou hunting and moose hunting.

**OTHER SOLUTIONS CONSIDERED?** Non-motorized hunts (walk-in); different season dates and/or shooting hours; road and/or vehicle restrictions; weapons restrictions; no-shoot road corridors. All were rejected for various reasons including eliminating user groups, not a solution that would work with our joint management agreement with federal subsistence; unenforceable.

**PROPOSED BY:** Joint coalition of Eagle, Central, Delta, Upper Tanana-Fortymile, and Fairbanks Advisory Committees and Eastern Interior Regional Advisory Council.

**LOG NUMBER:** I-10S-G-049

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**PROPOSAL 15 - 5 AAC 92.108 Identified big game prey populations and objectives.** Reduce the Fortymile Caribou Herd population objective to 45,000 to 75,000 caribou as follows:

Reduce the Fortymile Caribou Herd’s (FCH) population objective to 45,000 to 75,000 caribou.

**ISSUE:** Excessive population objectives for the Fortymile Caribou Herd. Recent years with low calving rates for the FCH indicate environmental stresses other than predators are affecting the FCH population dynamics. A scientific climate study of the Eastern Interior Management Area commissioned by the Bureau of Land Management in 2009 found negative impacts from climate change are occurring on the calving areas and the wintering / summer ranges of the FCH at the present time. The report stated: “Temperatures changes in Eastern Interior Alaska are projected to increase over the coming decades at an average rate of about 1°F per decade from the 1961-1990 historic 30-year average. Average annual temperature is expected to rise by about 6.4°F by 2049. A likely outcome of these changes is a lengthening of the growing season (May – Sep.), a change that could have profound effects on wildlife mating cycles, plant growth and flowering, water availability in soil and rivers, and hunting and fishing. Seasonal changes in climate will have profound impacts on the condition and health of wildlife habitat, lead to increased fire risk, and contribute to the likelihood of wetlands, streams, and lakes drying. Some species may benefit from these changes, while others may not be able to adapt or find suitable habitat conditions to sustain their populations.” (www.snap.uaf.edu)

In addition, the FCH calving area is located within a heavily used military operation area for low level jet fighter training. A scientific study conducted by the Department of Fish and Game investigating the effects on the herd published in 2005 stated: “we advise against assuming there are no long-term effects on calving caribou from jet over flights.”

An extensive mining operation exists in the same drainage the FCH uses for calving and overwintering. The mine is proposing an expansion. Off road vehicle (ORV) use has increased dramatically in the FCH range causing extensive degradation to the environment and potentially impacting migration patterns and preferred use areas for the herd.

Responsible stewardship of the FCH should mitigate these impacts, not intensify these negative effects by aggressively dismantling the very checks and balances nature has depended upon for a millennium.

Basing current caribou population objectives on poorly documented historical population estimates and a point in time with significantly different climate variables and environmental stressors than the FCH faces today is unjustifiable.

The Board of Game should also request the legislature fund, and the Department of Fish and Game develop a thorough habit analysis program to investigate climate change effects on the FCH range to provide the essential scientific data needed for defining population objectives in the future.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The state will continue to aggressively attempt to artificially increase the Forty mile caribou population beyond prudent numbers.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, managing the FCH population within the carrying capacity of the environment promotes the long term integrity of the herd and avoids potential dramatic shifts in population due to extreme weather events or diminishing range quality – both of which appear to be occurring due to climate change.

**WHO IS LIKELY TO BENEFIT?** Alaskan’s that depend on the FCH for a subsistence food source. Reducing the risk of a significant population crash due to changing and increasing environmental stresses.

**WHO IS LIKELY TO SUFFER?** Nobody – a reduction in the upper management objective to 75,000 caribou would still allow nearly a doubling of the current herd population.

**OTHER SOLUTIONS CONSIDERED?** Reducing negative impacts from ORV use, military training flights, and mining activity in critical habitat for the FCH. The board has no authority over the airspace or mining activity in Alaska. Reducing ORV use is within the authority of the Division of Natural Resources. Unfortunately, the legislature has not been willing to grant the division enforcement authority regarding ORV use. The legislature seems to have great difficulty funding mandates they create.

**PROPOSED BY:** Wade Willis

(SC-10S-G-007)

**PROPOSAL 16 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Modify season dates for Dall sheep for all Region III Units as follows:

Dall sheep season:

Residents - August 5-September 20

Nonresidents - August 12 - September 20

**ISSUE:** Modify the season dates for Dall sheep for all of Region III.

Traditional dates: August 10 - September 20.

New resident dates: August 5 - September 20.

New nonresident dates: August 12 - September 20.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The conflict between resident hunters and nonresident hunters (who are required to have a guide or a family relative) will continue. This proposal is now new to the Board of Game (it passed once and then was rejected at the very end of 2007 session) but it appears the board is resistant to doing anything without the blessings of the guides. Public lands are a resource for all Alaskans and I have not talked to a resident sheep hunter (who is not a guide) that doesn't like this proposal. Other states try to protect quality experiences for their resident hunters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This should eliminate the "bottle neck" of sheep hunters all trying to get in the field at the same time with different air service operations - poor weather and large numbers of hunters can cause a huge backlog. Most of the resident hunters will be leaving the field when the nonresidents are going out so both groups should enjoy a less crowded situation.

**WHO IS LIKELY TO BENEFIT?** Alaskans.

**WHO IS LIKELY TO SUFFER?** Guides will complain but they are running a business on a public resource that belongs to all of us and many of the guides and assistant guides are nonresidents. This proposal is not intended to stop guiding but to give the resident sheep hunter a period in the field where they don't have to compete with many resources guides have in place. The board will make this a money issue but sheep permits generate a very small amount of money compared to moose and caribou where a guide is not required. If the board thinks the sheep population is too low to add more days to the season, they should adjust the days of hunting but still give the resident some preference. Nonresident hunters enjoy about 70 percent harvest rate on sheep where the success rate for residents is about 25 percent. This eventually should be adopted state wide.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Tom Lamal

**LOG NUMBER:** I-10S-G-037

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## TOK AREA – UNITS 12, 20E

**PROPOSAL 17 - 5 AAC 84.270. Furbearer Trapping.** Change the season dates for trapping lynx in Units 12 and 20E as follows:

Close the November portion of the lynx season in Units 12 and 20E. Extend the closing date for lynx trapping in the Units 12 and 20E from March 15 to March 31.

**ISSUE:** A November season for lynx trapping in Units 12 and 20E was established in about 2004, with a bag limit of five lynx to allow trappers catching a few lynx, in November, in marten, fox, coyote or wolf sets to be able to keep the lynx (up to five) rather than having to surrender them to the Department of Fish and Game. The intent was never to open the lynx season, with no bag limit, in November, when fur quality is poor. In the past three to four years, more and more trappers have been abusing this regulation by setting hundreds of traps in Units 12 and 20E, primarily along the road system, as early as November 1. Also, some of these trappers are setting traps on November 1 and then not checking them until December and claiming they are catching lynx in these traps in December when the lynx were actually caught in November. In addition, Alaska Wildlife Troopers have tried to enforce this regulation and have been unable to make a case so far, because of the difficulty in identifying sets as lynx sets and not being able to identify trap owners that are catching lynx in November. Without observing an individual trapper taking more than five lynx out of traps, it is not possible to catch a violator.

Also, more opportunity is available in late March and an extension of the March portion of the season would allow more opportunity to harvest high quality adult lynx.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Abuse will continue and numerous lynx will be taken by unethical trappers. Enforcement will continue to be unable to enforce this regulation. There will be loss of opportunity in late March.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. This proposal would open the lynx season when fur quality is good and will result in all trappers having an equal chance of harvesting lynx beginning December 1. Enforcement will be able to confiscate lynx caught in November, without having to identify the trapper. Also, enforcement will be able to identify a violator by catching them taking only one lynx out of a trap and taking it home. Trappers will be able to trap high quality adult lynx in late-March that are currently unavailable for harvest because of the March 15 closing date.

**WHO IS LIKELY TO BENEFIT?** Ethical trappers that are currently losing opportunity to catch lynx that are being caught in November by unethical trappers. Trappers wanting to catch high quality lynx in late March.

**WHO IS LIKELY TO SUFFER?** Unethical trappers abusing the current November lynx season. Ethical trappers that catch a few lynx in November and will have to surrender them to Fish and Game. Trappers opposed to trapping lynx in late-March

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Upper Tanana Fortymile Fish and Game Advisory Committee

**LOG NUMBER:** I-10S-G-017

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**PROPOSAL 18 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Open a fall hunting season for the Chisana Caribou Herd in Unit 12 as follows:

Establish a joint federal/state draw permit hunt for the Chisana Caribou Herd starting the fall of 2011. This draw permit hunt should be structured similar to the Cordova moose draw permit hunt, with a portion of the permits issued to federally qualified subsistence hunters, under federal regulations (federal hunt), and the rest of the permits issued to Alaska residents and nonresidents, under state regulations (state hunt).

The hunt should be managed in accordance with the recommendations in the Chisana Herd Management Plan currently being drafted by Yukon Department of Environment, White River First Nation, Canadian Wildlife Service, National Park Service (Wrangell St. Elias), U.S. Fish and Wildlife Service and the Department of Fish and Game. The total numbers of permits issued for the joint federal/state draw permit hunt, should be in accordance with the recommendation in the plan.

The draft plan currently recommends a harvest rate of 2 percent of the annual minimum population estimate to be split evenly between Alaska and Yukon. The Alaska portion of the allotted harvest should be allocated between the federal and state draw permit hunts based on recent historic Alaska harvest records of the herd. (eg: harvest records available over the past 30 thirty years).

Bag limit: 1 Bull (this should be a bulls only season for the Federal and State Hunts as recommended in the Plan)

Season dates: September 1 through September 30.

Hunt area: Unit 12, within the White River Drainage and that portion within the Chisana River Drainage upstream from the winter trail that runs southeast from Pickerel Lake to the Canadian border.

**ISSUE:** The draft Chisana Herd Management Plan (plan), developed by Yukon Department of Environment, White River First Nation, Canadian Wildlife Service, National Park Service (Wrangell Saint Elias), U.S. Fish and Wildlife Service and Alaska Department of Fish and Game using extensive research data on the herd that was collected by these partners and the U.S. Geological Survey during the 2003 - 2008, says that this herd is at a level that will allow for a small sustainable harvest of bulls without harming the population.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** No harvest will occur

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Will provide additional opportunity to hunt caribou.

**WHO IS LIKELY TO BENEFIT?** This change will provide opportunity to a variety of hunter groups if the harvest is divided according to historic harvest data as recommended.

**WHO IS LIKELY TO SUFFER?** People opposed to any harvest of the Chisana herd.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Upper Tanana Fortymile Fish and Game Advisory Committee

**LOG NUMBER:** I-10S-G-028

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**PROPOSAL 19 - 5 AAC 85.025 Hunting seasons and bag limits for caribou; and 92.036. Permit for taking a child hunting.** Establish a fall registration hunt for youth and individuals with disabilities in Unit 20E as follows:

**Zone 3 Taylor Highway:** Residents **with PID, disabled or youth 11 - 15 YOA:** August 10 - **August 15** [SEPTEMBER 20] **with a quota of 100 caribou** ; permit conditions could include issuance of permits only in Tok, Chicken and Eagle and participation in other Fortymile caribou hunts prohibited.

**ISSUE:** Current August caribou hunt in Unit 20E has been closed by Emergency Order, and an early drawing hunt and a September 1 registration hunt proposed. Unless amended, this solution will disproportionately disadvantage young, senior, and disabled hunters. Drawing hunt could lead to Tier II subsistence hunt.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Young hunters may not be able to hunt after school starts. Senior and disabled hunters will not be able to use ATV's to retrieve meat after August 24 in the Ladue River Controlled Use Area.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** August caribou meat is superb. August hunt is best for youth before school. Senior and disabled hunters would still have a reasonable opportunity to hunt before access restrictions on August 24 in the Ladue River CUA when caribou are available, allowing feasible access and meat salvage.

**WHO IS LIKELY TO BENEFIT?** Young Alaskans before schools starts. Senior and disabled hunters who have traditionally hunted before access restrictions are imposed making hunting very difficult or impossible later in the fall. Alaskans who would still be able to avoid a Tier II subsistence hunt.

**WHO IS LIKELY TO SUFFER?** Recipients of the 100 proposed August drawing permits who are not youth, seniors or disabled. These hunters would still be able to hunt during the proposed September hunt.

**OTHER SOLUTIONS CONSIDERED?** Community harvest quota (premature). Walk-in (not feasible for many seniors and disabled). Early drawing hunt (could lead to Tier II hunt due to lottery restrictions of subsistence opportunity).

**PROPOSED BY:** John Barker and Dave Kelleyhouse

**LOG NUMBER:** I-10S-G-001

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**PROPOSAL 20 - 5 AAC 85.025 Hunting seasons and bag limits for caribou.** Increase the harvest limit for caribou in Unit 20E as follows:

Increase the harvest limit for caribou in Unit 20E (Fortymile Caribou Herd) to the growth amount so the herd stays at current levels. That would be 7-10 percent. Watch the cow-calf ratios and revisit harvest numbers at a later date.

**ISSUE:** Too many caribou for the area to maintain a healthy population. Limits will be imposed on the current hunters when none are needed. We need to pay close attention to the cow and calf ratio this coming spring to support this claim. I hunt this area every year.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Population will crash and harvesting opportunities will be taken away.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Makes for a healthier herd as they then do not over graze the area. The August caribou meat is miles better tasting. I would rather have a smaller healthier herd than over use the area and have it take years to recover.

**WHO IS LIKELY TO BENEFIT?** All.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Community harvest program (not fair to all Alaskans for an Alaskan resource); walk-in (not fair to disabled or elderly) and later hunt season (meat not as tasty).

**PROPOSED BY:** Bill Iverson

**LOG NUMBER:** I-10S-G-022

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**PROPOSAL 21 - 5 AAC 85.025 Hunting seasons and bag limits for caribou; and 92.052 Discretionary permit hunt conditions and procedures.** Apply restrictions to the Fortymile caribou permit hunt in Unit 20E as follows:

Require blaze orange vests be worn by all hunters. Require all hunters to have hunter's education card (presented at the time the tag is picked up). Discontinue the current rifle season and change it to an archery only hunt from August 10 - 17; bow hunting safety card required. Make a new rifle season from August 17 - 24. Limit the number of tags to nonresidents to 40 tags during the rifle season and 10 tags for the archery season. These tags on a draw permit only. No drawing for resident hunters for either rifle hunt or archery hunt

**ISSUE:** The number of hunters hunting in Unit 20E, Fortymile caribou hunt (RC860) is becoming dangerous. Hunting for caribou in this hunt is more like combat caribou hunting, than actual hunting. The situation at the more popular areas (Chicken Ridge and Boundary) is becoming increasingly dangerous for people. Not only that but the sheer number of people hunting in relatively small areas creates an atmosphere of high stress (amongst hunters) due to the 'competitive nature' of hunters trying to access the same animals at the same time. There are a lot of unethical hunters not following up on wounded game, shooting in unsafe directions, shooting and hitting multiple animals in one shot. Shooting towards other hunters, and harassing the caribou by trying to drive them by four wheeler. (All these situations observed by myself in one day of caribou hunting).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Some one will get seriously hurt or killed if the number of people hunting in the area is not limited or regulated in some way.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** No, it addresses safety issues that are currently a major issue. It will improve the quality of the hunt by helping people feel safe when they are afield, instead of feeling like they are in a war zone. It will hopefully put better educated hunters in the field.

**WHO IS LIKELY TO BENEFIT?** Bow hunters. All other hunters (from a safety perspective). By moving the rifle season date later in the month it would force hunters to choose between other types of hunts and therefore decrease the number of people hunting for caribou. Residents will benefit because no-resident hunters will be limited. The resource should be a priority for resident hunters first.

**WHO IS LIKELY TO SUFFER?** Nonresidents, possible guides, but not many as this is more of a do it yourself hunt for nonresidents

**OTHER SOLUTIONS CONSIDERED?** Pick up tags at Tok Department of Fish and Game Office on (or between) a specified date(s) in the spring (April). This would help give local area residents more of an opportunity to take part in a hunt which is highly depended upon as a food source. A system like this would put an undue amount of pressure on Tok office resources and could possibly preclude some people of rural areas the opportunity to get a tag, if they did not have the transportation necessary to get to Tok.

**PROPOSED BY:** Julie Hermans

**LOG NUMBER:** HQ-10S-G-003

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**PROPOSAL 22 - 5 AAC 85.045 Hunting seasons and bag limits for moose.** Extend the moose season on certain private lands in Unit 12 as follows:

Private lands within the Tetlin Indian Reservation excluding the Tok River drainage:  
Resident hunters: August 24 - September 20; 1 bull.  
Nonresident hunters: September 1 - September 20; 1 bull. 50 inch antlers or 4 brow tines.

**ISSUE:** The length of moose season on the private lands within Unit 12 is too short. There are areas that have a sub-sustainable harvest population that are not being hunted. The Reservation has a high moose population but one of the shortest seasons in the state.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** High density moose areas that are difficult to access during the short season will continued to be not hunted.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Local tribal members that have rights to the private land will have a longer opportunity to harvest bulls. The guide pressure could be distributed more evenly across the Reservation. Hunters could gain access some more remote areas. Hunters will have much greater opportunity to harvest predators.

**WHO IS LIKELY TO BENEFIT?** Local tribal members and guided nonresident hunters.

**WHO IS LIKELY TO SUFFER?** No one; it is private land.

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Jeff Burwell

**LOG NUMBER:** I-10S-G-002

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**PROPOSAL 23 - 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep.** Reduce the number of permits for the Tok Management area for Dall Sheep in Units 12 and 20 as follows:

Reducing the number of permits is the simplest solution. The seasons and bag limit regulations would not change, but the number of permits would be reduced to 80 issued instead of 100. The 20-permit reduction is intended as a temporary regulation. When the sheep's numbers rebound to higher levels, the number of permits issued would be increased.

**ISSUE:** For the past three years the Tok Management Area (TMA) has not met its trophy ram management objective of 7-10 percent 40 inch class rams. Harvest is down to two rams over 40

inches or 5 percent. Based on our observations, sheep numbers within the TMA have declined dramatically since the creation of the TMA in 1974. Ram bands that once existed are no longer present. Areas that once held up to 50 rams are down to 7-10. The original number of permits issued each year was 120. In 2002, the permit number was reduced to 100 due to declining sheep numbers which resulted in short term increase to harvest of trophy rams. However, the reduction of permits has not kept up with the natural decline of sheep, resulting in a higher harvest of smaller rams. Although lamb production and the ratio of rams to ewes has not declined in recent years the general population decline is the problem. At current harvest fewer rams reach 40 inches. The four management objectives currently set as a standard, basically apply to high population or a low population. The percentages can be the same and the age structure can be the same. Even though there are fewer permits hunters continue to take the same number of rams, which has reduced trophy quality. This proposal will not be cutting the hunt opportunity below the harvest objective of thirty to forty five rams.

Four Objectives have guided the TMA since its inception:

1. Maintain a population capable of supporting an annual harvest of 30-45 rams;
2. Maintain a mean horn length of 36-37 inches among harvested rams and a mean age of 8-9 years;
3. Maintain the proportion of harvested rams with 40-inch horns or larger at 7-10 percent; and
4. Prevent unacceptable increases in hunter concentration and maintain the existing aesthetically pleasing qualities associated with sheep hunting in the TMA.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If harvest continues at this same rate with current low trophy sheep numbers, the TMA will be like other areas of the state where almost all the legal rams will be harvested the same fall they become legal. This was not the objective of the TMA.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, the proposal helps address the decrease of trophy rams and will help overall ram numbers increase.

**WHO IS LIKELY TO BENEFIT?** Hunters who are lucky enough to draw a permit would have a better chance at getting a trophy quality ram.

**WHO IS LIKELY TO SUFFER?** Until the area recovers there will be 20 fewer hunters every year who would not have the opportunity to hunt for a Dall ram in the TMA. Note: Three proponents of the reduction of permits are members of the Upper Tanana 40-Mile AC who have known the area intimately since the 60's and 70's and are guides or transporters that make a significant part of their livelihood on TMA sheep hunters. These people have hunted and live in the area since the 60's and have seen a serious decline of the population. They are trying to prevent any further decline in trophy rams before it is too late. The TMA was established to provide a trophy management area. The Board of Game set this area up as one of its objectives. Hunters no longer have the choices they once had for trophy

**OTHER SOLUTIONS CONSIDERED?** Sixty permits; the idea was rejected because the 20 percent reduction in permits should allow trophy rams to increase. 60 permits would unnecessarily reduce hunter opportunity.

**PROPOSED BY:** Upper Tanana Forty-Mile Advisory Committee.

**LOG NUMBER:** I-10S-G-046

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**PROPOSAL 24 - 5 AAC 92.125(b) Predation control areas implementation plans.** Restrict nonresident hunting for moose and caribou in the Upper Yukon/Tanana Predation Control Area in Units 12 and 20 as follows:

Add the following language to 5 AAC 92.125(b):

**.... within the UYTPCA active predator control area, defined by the current intensive management plan, nonresident hunting will not be authorized for moose or caribou populations with a positive customary and traditional use finding when:**

**A: the most current population estimate for moose or caribou is below the minimum population objective and/or the bull:cow ratio for that species as defined in 5 AAC 92.108 or the intensive management plan....**

**ISSUE:** Excessive nonresident hunting opportunity in the Upper Yukon Tanana Predator Control Area.

Nonresident sport or trophy hunting for moose and/or caribou in game populations with a positive customary and traditional use finding that are also identified in the Upper Yukon/Tanana intensive management plan as regions with a reduced moose and/or caribou population(s) requiring intensive management to rebuild the prey populations.

Both moose and caribou game populations are mandated by law to be a priority subsistence resource for Alaska residents by AS 16.05.255(13)d which states “the taking of moose, deer, elk and caribou by residents for personal or family consumption has preference over taking by nonresidents”.

“the resident preference serves the purpose of conserving scarce wildlife resources for Alaska residents; this unquestionably represents a legitimate state interest” Shepherd v. State, Department of Fish and Game, 897 P. 2d 33 (Alaska 1995).

Fortymile Caribou Herd Harvest: The Fortymile Caribou Herd is below the minimum population objective and has been relatively stable in population since regulatory year (RY) 01. Estimated population growth between RY 01 to RY 07 is only 1200 caribou.

Hunting harvest has exceeded the harvestable surplus quota for the Fortymile Caribou Herd (FCH) every year from RY 06 to RY 09. Cow harvest has exceeded the harvestable surplus for the last three reporting periods available RY 06 – RY08. In 2009, the FCH fall harvest quota was exceeded in just 24 hours by 36 percent and the entire year’s harvest quota was exceeded in the following two days. The latest hunt records detailing hunter residency indicate nonresidents harvested 11 percent of the FCH caribou for 2007/2008 season. Local residents harvested just 12 percent of the caribou that year. Nonresidents had a 53 percent success rate for caribou while local residents had a 31 percent success rate that year. Nonresident hunters, many of whom are guided, have a clear advantage over local subsistence FCH hunters and are negatively impacting local resident harvest through competition for preferred hunting dates and/or locations. Harvest success rate for all Alaskan residents hunting the FCH in RY 07 was 30 percent, significantly lower than the success rate for nonresidents.

Moose Harvest Game Management Unit 20E: Moose harvest is significantly below the minimum harvest objective of 500 moose. During RY 05 – RY 06 moose harvest averaged only 133 moose per year.

The latest moose harvest data for Unit 20E for RY 03 – RY 06; indicated nonresidents harvested 19 percent of the moose while local resident hunters also harvested 19 percent of the total harvest. Nonresidents harvest is significant. Nonresident success rate though averaged 27 percent compared to a local resident success rate of only 16 percent. Again, nonresident hunters, many of whom are guided, have a clear advantage over local subsistence hunters and are negatively impacting local resident harvest through competition for preferred dates and/or locations. Harvest success rate for all Alaskan residents hunting in Unit 20E during these regulatory years is only 17 percent success rate, lower than the success rate for nonresidents. The latest Department of Fish and Game moose management report states “our greatest concern is increasing numbers of hunters”.

The state and board of game have long contended that predator control is being conducted to protect the rural subsistence harvest. Clearly in the UYTPCA, the state is not meeting that claim.

The state and board of game have long contended that predator control is being conducted to protect the rural subsistence harvest. Clearly in the UYTPCA, the state is not meeting that claim. Allowing nonresident harvest in the UYTPCA for moose and caribou at this time is unjustified.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Nonresident hunters will continue to compete with resident Alaskans for limited subsistence resources in areas with a positive customary and traditional use finding for those subsistence resources.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, reducing nonessential sport and trophy hunting will enhance the recovery rate of essential subsistence resources and prioritize existing depleted resources for resident harvest.

**WHO IS LIKELY TO BENEFIT?** Resident Alaskans that depend on subsistence resources in areas with depressed game populations, especially local residents living within intensive management areas trying to reduce prey harvest. The department will benefit by having the

authority to limit nonessential human harvest, an essential component of an effective adaptive management plan that promotes the recovery of depressed subsistence resources.

**WHO IS LIKELY TO SUFFER?** In the short term, nonresident hunters will lose the opportunity to hunt in areas where resident subsistence need exceeds the amount of available game. In the long run, nonresident hunters will benefit from healthy game populations in the region, especially trophy hunters.

**OTHER SOLUTIONS CONSIDERED?** Changing the Alaska statute that requires moose, deer, elk and caribou to be prioritized for resident harvest but that was unacceptable and contrary to the Alaska way of life. Restricting nonresident hunting to remote subunits or non prime hunting dates. This is unacceptable due to the fact that moose and caribou are highly migratory. Allowing nonresident harvest in any location of an active predator control area will adversely affect resident harvest potential and will reduce the overall recovery rate of the prey species.

**PROPOSED BY:** Anchorage Fish & Game Advisory Committee

**LOG NUMBER:** SC-10S-G-001

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**PROPOSAL 25 - 5 AAC 92.540. Controlled Use Areas.** Change the description of the Ladue Controlled Use Area FOR Unit 20E as follows:

Change the legal description of the Ladue Controlled Use Area to exclude the portion of the Walker Fork Fortymile River drainage that is south and east of the Taylor Highway and Boundary Cutoff Road and drains into the east bank of the Walker For Fortymile River from the Taylor Highway bridge upstream to it's junction with Liberty Creek, the portion of the Liberty Creek drainage draining into the north bank of Liberty Creek, and the portion of the Sixtymile River drainage, draining into the Sixtymile River downstream of the Alaska Yukon border.

**ISSUE:** The northwest portion of the Ladue CUA (LCUA) has a network of mining trails that have provided access for moose and caribou hunters. In 2008, based on a proposal submitted by the Upper Tanana-Fortymile AC, the Board of Game (board) changed the motorized restrictions in the LCUA from motorized travel allowed on all pre-established trails, to motorized travel only allowed on the Liberty and 9 -Mile trails. This excluded travel on the network of trails in the northwest portion of the LCUA that are important to caribou and moose hunters.

The Upper Tanana/Fortymile AC had intended to recommend that the board exclude this area from the LCUA when the motorized restriction was revised in 2008, but this recommendation did not get relayed for some reason. It was not the intent of the Upper Tanana/Fortymile AC to exclude use of this network of trails in the northwest portion of the LCUA.

It is important to note that there were no biological issues with hunters traveling on these trails identified during the 2008 Board of Game meeting.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunters will continue to be unnecessarily restricted from traveling on these trails in the northwest portion of the LCUA.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. This proposal would provide hunters additional access to hunt all species of game in this area. This would result in an increase in hunting opportunity.

**WHO IS LIKELY TO BENEFIT?** Hunters inclined to hunt in this area during August 24 to September 30.

**WHO IS LIKELY TO SUFFER?** People who prefer to have motorized restrictions during August 24 to September 30.

**OTHER SOLUTIONS CONSIDERED?** Allow travel on all established trails. The Department of Fish and Game was opposed to this because it was enforceable.

**PROPOSED BY:** Upper Tanana-Fortymile Fish and Game Advisory Committee

**LOG NUMBER:** I-10S-G-016

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**FAIRBANKS AREA – UNITS 20A, 20B, 20C, 20F, & 25C**

**PROPOSAL 26 - 5 AAC 84.270. Furbearer Trapping.** Shorten the beaver trapping season in Unit 20B as follows:

Trapping for beaver in Unit 20B will begin November 1 and end April 15. Regulation would read: Units 20D: [AND REMAINDER OF 20B] September 25 - May 31; no limit.

**Remainder of 20B: November 1 - April 15; no limit.**

**ISSUE:** Overharvesting of beaver populations on the Chatanika, Chena and Salcha River systems, due to open-water trapping (a non-traditional Alaskan trapping method where under-ice trapping is occurring).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Beaver populations will decline, beaver hides will be taken in non-prime condition, and urban trappers will be denied the opportunity to practice traditional Alaskan trapping activities.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, open-water beaver hides do not have prime leather, and when beaver are trapped when there is no snow cover, the winter under-ice trapper will not know a take has occurred and will over-harvest the house.

**WHO IS LIKELY TO BENEFIT?** Individuals trapping the Chatanika, Chena and Salcha Rivers using traditional Alaskan trapping methods, under-water trapping techniques.

**WHO IS LIKELY TO SUFFER?** Open water trappers, currently taking beaver from September through November, and April through May.

**OTHER SOLUTIONS CONSIDERED?** Leaving the regulation as is, is an option, but it will result in continued reduced trapping for opportunities for prime beaver for those using traditional Alaskan trapping methods.

**PROPOSED BY:** Garry Hutchison

**LOG NUMBER:** I-10S-G-036

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**PROPOSAL 27 - 5 AAC 85.020(18). Hunting Seasons and bag limits for brown bear.** Lengthen the brown bear season in Unit 20A as follows:

Brown/grizzly bear season is open in Unit 20A between June 30 and August 10.

**ISSUE:** We would like the Board of Game to have the brown/grizzly bear season to be extended in Unit 20A because of the limited hunting opportunities for harvesting grizzly bear. This will

also simplify the bear hunting seasons by conforming to the seasons of other sub-units around Unit 20A.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Continue to have limited opportunity for harvesting a grizzly in Unit 20A. Continued confusion of hunters with the various brown bear seasons in the area.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This will improve the resource harvested by allowing sheep, caribou, and early moose hunters the option of taking bear while hunting. This will also reduce predation on moose and other game animals in the Unit.

**WHO IS LIKELY TO BENEFIT?** Anyone who wants to hunt in Unit 20A.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Thought about opening season from Aug 1 - May 31, but after talking with others chose to try to keep dates the same as other hunts in Unit 20.

**PROPOSED BY:** Delta Advisory Committee

**LOG NUMBER:** HQ-10S-G-009

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**PROPOSAL 28 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear; and 92.XXX. Permit for hunting brown bear with the use of bait or scent lures.** Allow the taking of brown bear over bait in areas of Unit 20 as follows:

Provide a regulation for taking grizzlies over bait as we do for black bears. Two years ago it started at my bear baits with one grizzly. Last summer I had four different grizzlies and with all the cow moose being killed off and no predator control plan going on in these areas we need to do something. I believe they are hunting the black bears around my bait for something to eat, since there are not that many calves in these areas any more.

**ISSUE:** Bear baiting for grizzlies in the areas of Units 20A, 20B, 20C. The large amount of grizzly bears in these areas and the lack of calf moose for them to eat, I believe that they are killing and eating black bears on bear baits.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If the problem is not taken care of we will see more problem grizzly bears as they are looking for something to eat since the cow moose population has been devastated and there are not as many calf moose out there for them to eat and they are hitting bear baiting stands looking for black bears to eat since there are not as many moose calves.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, it will remove some of these bears from the areas and on top of that it will help our moose population with some predator control.

**WHO IS LIKELY TO BENEFIT?** The moose in the area and the bear baiter who is trying to hunt black bear over bait.

**WHO IS LIKELY TO SUFFER?** No one would suffer.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Lee Olsen

**LOG NUMBER:** I-10S-G-008

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**PROPOSAL 29 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear; and 92.XXX. Permit for hunting brown bear with the use of bait or scent lures.** Allow the taking of brown bear over bait and extend the hunting season as follows:

I would like the Board of Game to open baiting of bears in subunit 20C to the taking of brown bear over bait, and extend the brown bear season through the end of bear baiting season to allow for a reasonable opportunity to harvest brown bear.

**ISSUE:** Brown bear populations have begun taking over areas of 20C which historically have been populated by black bear. During the 2009 fire season, fire fighters had many encounters with troublesome bears that would not leave their camps alone. I expect the owners of the remote recreational cabins will experience the same problem because critical bear habitat has been destroyed by fire. This area has had low moose densities due to lightly harvested bear and wolf populations. The evidence would seem to support wolves and brown bears are the limiting factor for moose in this Unit.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** I believe these bears will begin to create problems with cabin owners and other recreational users of the area. Black bear harvest will decline because black bear baiters in the area have a hard time with grizzlies destroying baits and there have been reports of grizzlies taking black bear after they were shot over bait.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** I believe Unit 20C is over its carrying capacity for brown bear. Its close proximity to Denali National Park (DNP) allows these bears to migrate into an area where they are not subjected to hunting pressures (about half of Unit 20C). When the bears desire, they move down the river corridors coming out of DNP which are well developed in the lower portions. Removing some predators will increase survival rates in moose calves, and this will hopefully help increase a moose population that has always been limited by predators instead of habitat. Hunt quality for bear baiter should be greatly improved as they will be able to harvest problem brown bear that up until now just destroy baits and move on. Recreational users

should be able to enjoy their remote recreational experiences with less concern over problem bears. I would expect the spring harvest of brown bear over bait to be about equal to the fall harvest when moose hunters' opportunistically harvest brown bear during moose season.

**WHO IS LIKELY TO BENEFIT?** Black bear baiters will benefit from being able to shoot the brown bear that come to their baits. Moose hunters will benefit by the board creating a ecosystem capable of providing sustained yield of moose. Recreational users will benefit by the removal of some bears. The ecosystem this population of bears live in has been in a large part destroyed and they can not move to more suitable habitat. They will have to survive with what they have and this may mean savaging off of local cabin owners.

**WHO IS LIKELY TO SUFFER?** I cannot think of anyone who will suffer from a grizzly bear baiting hunting opportunity in 20C.

**OTHER SOLUTIONS CONSIDERED?** No other solutions considered.

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-023

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**PROPOSAL 30 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear; and 92.XXX. Permit for hunting brown bear with the use of bait or scent lures.** Allow the taking of brown bear over bait as follows:

You may take brown bear over bait in Unit 20C during the bear baiting season. Registration permit is required. In order to obtain a brown bear registration permit in this area the applicant must have attended a bear baiting clinic. Season length for bear baiting in Unit 20C is April 15 – 30 June. Bow hunters wishing to hunt brown bear over bait in Unit 20C are required to complete an IBEP or equivalent course.

All other baiting regulations must be followed when baiting for brown bear (distance from roads and cabins, removal of baiting materials, types of bait, etc.)

Residents and nonresidents, Unit 20C: One bear every regulatory year, September 1 – June 30

**ISSUE:** Low moose densities in subunit 20C due to lightly harvested brown bear populations. The evidence would seem to support wolves and brown bears are the limiting factor for moose in this subunit 20C. Anecdotal information gathered from hunters in the area report brown bears appearing in higher numbers than traditionally observed.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Moose densities in Unit 20C have been low for many years, presumably because of combined predation from wolves and bears (Gasaway et al. 1992) and habitat limitations. Brown bear populations are lightly harvested in this subunit, on average five brown bear per year (25 brown bear harvested between 2004-2008). Bull moose harvest is low relative (97 to 143 bull moose harvested annually from 1998-

2007) to population size (est. 3,500-4,500 moose) as indicated by high proportion of large bulls in the harvest (ranging between 30 percent and 50 percent of bull moose reported in the fall harvest with antler spread > 50 inches from 1995 to 2006). Thus, we can conclude that harvest is a minor limiting factor affecting population dynamics relative to predation. Additionally, antler restrictions are unlikely to be beneficial in increasing moose densities.

In the summer of 2009, several large wildfires burned large tracts of land in this subunit (749,511.8 acres burned in subunit 20C during the 2009 fire season). When speaking with the Division of Forestry, it appears these areas will recover, but at a somewhat slower rate than other areas of Alaska. Tracts of sand dunes, permafrost, and the removal of the organic layer leaving only a thin layer of ash for seed bed material, are a few of the complicating factors of recovery. Soil moisture is also very important in the recovery. Soil moisture is also very important in the recovery of this habitat. The sand dune base does not allow for adequate absorption/retention of moisture. It is expected to take as much as five years for the habitat to become fully productive again.

Trends in moose populations have been difficult to identify, but densities probably fluctuate within 0.1 and 1.1 moose/square mile, and more likely between 0.2 to 0.7 moose/square mile based on Alaska Yukon studies in large areas (>800 square miles) with 2 or more lightly-harvested predators (Gasaway et al. 1992). It has been conservatively estimated 3500-4500 moose inhabited Unit 20C moose habitat: 2000 within Denali National Park (assuming an average density of 0.58 moose/square mile) and 1500-2500 outside Denali National Park (assuming an average density of 0.25 moose/square miles). Moose densities in areas like 20C are typically limited by predation rather than forage, because predators kill a large majority of calves produced on an annual basis (Gasaway et al. 1992, Boertje et al. 2009).

Moose hunter's success rates have varied between 21 percent and 35 percent in this subunit. Success is higher for those hunting during the second and third weeks of the season. No moose composition counts have been conducted in the subunit so bull: 100 cows and calves: 100 cows are unknown. The only known biological data is harvest information. The percentage of large bulls harvested in the area peaked in 2003 at 50 percent and since has averaged around 30 percent. Annual harvest information shows a declining harvest from 140 bulls down to 97 in the 2004-2005 hunting season. The 2006 & 2007 harvest data showed a marked improvement in harvest numbers 129 and 143 respectively. The number of moose hunters using this subunit has slowly increased over the years (with a small decline during the 2005 and 2006 hunting seasons) up to 520 hunters reporting hunting 2007. Access into the area for hunting appears most commonly via boat, 3-or 4-wheeler, other ORV's, and airplane. Smaller numbers use highway vehicle, horse/dogsled, and other unidentified methods for access.

To summarize, without intervention from the Board of Game in the form of management of predators, this subunit will not be managed for the maximum benefit of all Alaskans as required by the Alaskan Constitution. Without this intervention, it is likely the management goal of providing for a sustained yield of these low-density populations will be unattainable in this subunit for the next five years. If predator-prey ratios do not change, the prey populations will likely decline drastically due to poor quality habitat in burn areas and two lightly harvested predator populations.

Over-harvest of brown bear in this Unit is unlikely even with increased success rates from baiting brown bears.

First, according to Dean (1987) and Eagan (1995) the best brown bear habitat in this subunit lays in the boundaries of Denali National Park (est. 5355.9 square miles of subunit 20C are within the boundaries of Denali National Park where brown bear are not subjected to hunting pressures) which is a little less than half of the subunit. Eagan classified the mountainous portion of Unit 20C into the super-density stratum of 52-78 bears/1000 square miles, while Dean estimated 88 bears / 100 square miles. In other words, the portion within Denali National Park (DNP) is the densest and most productive brown bear habitat in 20C.

Secondly, the 20C Management Goals are: maintain healthy grizzly populations and the ecosystems upon which they depend (the ecosystem in much of this unit has been seriously disturbed by wild fire and it would be prudent to provide a time of reduced predation to allow for recovery to occur); provide people with an opportunity to hunt, view, and photograph grizzly bears; avoid human-grizzly bear interaction that threaten human life and property (due to the disturbance in this ecosystem it is felt that food will be in short supply. This is likely to cause a dramatic increase in the human-grizzly bear conflict which will no doubt result in an increase of defense of life and property shootings of grizzly bear in the area); and maintain a grizzly bear population within DNP that is largely unaffected by human activity and is not subject to hunting within the park. The Management Objectives are to maintain a closed season on grizzly bear hunting in Denali National Park.

Finally, if baiting is used to increase harvest success of brown bear hunting in 20C, then the Department of Fish and Game would have discretionary authority to close bear baiting for brown bears as this is a registration hunt.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Unit 20C has suitable habitat for moose, but prior to the 2009 fire season it had sustained only low moose densities, not related to habitat. Limiting factors were always recognized to be the lack of predator control of wolves and bears. Allowing baiting of brown bears will reduce predation on the moose population, more moose calves will survive, and a higher survival rate equates to a larger moose population. Many game populations of Alaska are in decline and hunting areas with healthy moose populations have had to bear the burden of increased hunting pressure from hunters whom normally hunt in the areas of decline. Unit 20C swept over 749,512 acres of the habitat during the 2009 fire season which means excellent moose habitat should be available within the next five years. With a minimal amount of effort in the form of brown bear baiting, one of the predator populations that have been limiting this moose population can be controlled. These conditions should allow the moose populations to achieve a sustainable yield capable of providing ample hunting opportunity for many more Alaskans.

While this area may be remote, many Alaskan residents have recreational property on the ample lakes and rivers that run through the submit. Some of the private holdings include, but are not limited to the Teklanika I, II, & III; Teklanika Channel Lake; Dune Lake; Kindanina Lake; Bear

Lake; and homesteads on the Zitziana River, and Cosna River. There are many more remote lands available from the State of Alaska. Increasing hunting opportunity and quality will make this area more desirable and increase hunter dispersal into the area, thereby decreasing competition elsewhere. In addition to private lands, much of the subunit is controlled by the State of Alaska and available to access by all

**WHO IS LIKELY TO BENEFIT?** Bear baiters who have a brown/grizzly bear come to their bait station would be able to harvest the animal. Brown bear populations inevitably will become healthier as the larger boars will, no doubt, be the target of ethical hunters. In areas between the Kantishna and Teklanika rivers, cabin owners could benefit by having a smaller population of brown bear in an area where all berry patches have been burned, causing the brown bear to look for alternative food sources (i.e. food cached in cabins). Future moose hunters should benefit by having moose populations that can sustain a larger harvest. Hunting quality should also improve by having more game to spot. As the area becomes more productive and hunter success increases, hunters in nearby game units may move into the area. Recreational users of the area would benefit by having an opportunity to see both moose and brown bear at sustainable population levels along the river corridors, trails, and lakes.

**WHO IS LIKELY TO SUFFER?** People who have an aversion to bear baiting, management of predator populations, and hunting in general probably would not like to see this hunting opportunity expanded to include brown bear, but it is likely not to cause them to suffer any greater injury than conflict of ideology.

Some individuals will claim that brown bears will become habituated to feeding by humans if harvesting brown bear over bait becomes legal. Brown bear have already become habituated to black bear baits in the area, but are allowed to walk away from the bait stations. Allowing brown bear to be harvested over bait will actually reduce the danger as some of the habituated animals will be harvested.

**OTHER SOLUTIONS CONSIDERED?** Considered attempting to get the area declared a black bear and brown bear predator management area. It is believed this is an option, but it would be far easier for the Department of Fish and Game to manage a brown bear baiting season than a predator management area. It is debatable whether enough studies and scientific data exist for this area to become declared a predator management area. There are no fall aerial moose composition counts, no spring calf counts, and no mortality studies. Most of the information is anecdotal in nature or assumed estimates based on studies of similar locations. The board would need to order surveys in order to proceed in this matter.

Antler restriction was rejected because there does not seem to be a population composition problem. When considering the biological studies for other similar areas, it becomes obvious there is a predator issue. Anecdotal information from hunters in this area indicates brown bear numbers are growing in areas that have been previously sparsely inhabited by them. Lengthening the brown bear season would only be effective when combined with bear baiting. Current hunter techniques are only minimally successful at harvesting brown bear in this subunit. The yearly average between 2004-2008 is 5 bear/year. Most of the harvest occurred in

the fall when larger numbers of moose hunters are in the field and can opportunistically harvest a brown bear.

The situation could be left as it is currently. However, in a few years it is more likely the management objectives will not be met. The constitutional mandate of managing on a sustained yield basis subject to preferences amongst beneficial uses will also fail to be achieved. As the moose numbers dwindle from poor habitat and heavy predation, hunters will begin to hunt in other locations, harvest numbers will decrease, and this area will be what has become known as a predator pit (a management area where predator prey ratios are upside down and few prey animals survive to recruitment). In order for an individual to choose this course of action, he/she would have to believe that a prey population can thrive in an area where 1/5 of the habitat not in Denali National Park has been destroyed by fire and where two lightly-harvested predator populations occur in unmanaged numbers.

**PROPOSED BY:** Fairbanks Advisory Committee

**LOG NUMBER:** I-10S-G-027

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**PROPOSAL 31 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Expand the brown bear season dates for Units 20C and 20A as follows:

Unit 20A, one bear every regulatory year September 1 [5th] through **June 30** [May 31]

Unit 20C, one bear every regulatory year September 1 through **June 30** [May 31]

OR (preferably)

Unit 20A, one bear every regulatory year **August 10** - [September 5] - **June 30** [May 31]

Unit 20C, one bear every regulatory year **August 10** - [September 1] - **June 30** [May 31]

**ISSUE:** Extend grizzly bear season for Units 20A and 20C due to population increase since last survey of 1995 and summer 2009 fire seasons creating travel corridors through populated areas.

The current allocation of hunting dates has not made sense for many years. The bulk of Unit 20 subunits D, E, F all have opening dates of August 10 through June 30, with equivalent or greater road access than those within the Units at 20A and 20C; subunit 20B with the largest population base of Unit 20 to include the City of Fairbanks has a longer season than subunit 20A with the seasonal restriction in place due to road access. Unit 20A is extremely limited via Parks Highway access and is predominantly fly in only. Whereas Unit 20B is laced with access points corner to corner. It should be noted that after the 2005 fires to the north and east of Unit 20B and the 2006 fires south west of Unit 20B, the harvest due to defense of life and property (DLP) of grizzly took a sharp jump in 2007 in the Fairbanks and North Pole residential areas.

Allowing the Unit 20A and 20C seasons to open on the August 10 would correspond with the opening of sheep and caribou hunting within the two units and allow for a few more incidental harvests of grizzly bears. The other option is to align the seasons with moose hunt opening September 1. However for at least the next two regulatory years, I feel it should be the August opener due to the high level of bear activity in the Units and allow a greater take of grizzly bears

to balance the population out. Future balance should the need arise can be met by returning to the September opening date. However all the adjoining Units should have the same opening dates to prevent confusion among the hunting public. With this side of the street opened on the 1st and that side of the street opened the 5th as the Parks Highway and Nenana River are the approximate accessible boundaries for both Units 20A and 20C.

Unit 20D with a large population base of the community of Delta Junction and surrounding rural people has had August to July harvest dates without any complication or severe reduction of grizzly population. Local Unit 20D black bear bait hunters have been run out of Unit 20D for the grizzly population years ago. Unit 20D borders 20A to the east.

Unit 13 has had for many years allowed one bear per year with no closed season and no harvest tag required, 9except that portion of Unit 13E within Denali State Park, August 10th - June 15), with ample highway access via Parks, Glenn, Richardson, and Denali Highways; as well as a substantial trail system before each highway. And no significant reduction of bear numbers, Unit 13 borders Unit 20A to the south.

Unit 12 borders Unit 20 to the east with season openers of August 10 - June 30. Unit 16 to the southwest is a well known predator control area that is under intensive predator management just outside and with ready access to the states' largest population base of The Mat-Su and Anchorage, with limits of two grizzly per year and no closed season available. With ready highway access and elaborate trail and river systems throughout. In this area the Board of Game and State of Alaska resorted to the use of helicopters and bucket snares to reduce the black bear population as the hunter pressure of 500 black bear harvest a year was not enough.

It would make sense that the Units of 20A and 20C have become refuge for hunted populations of predatory game that has been readily accessed by many points around bordering Units and this game is accumulating in the harder to access regions of Units 20A and 20C. Both Units 20A & 20C are widely inaccessible, and have a myriad of problems associated with access. The addition of time in the spring is to accommodate local rural residents: 1.) that are more likely to harvest and report a bear if the season is open rather than to deal with a problematic bear and leave it to waste and not report harvest or deal with the DLP reporting and 2.) pr would rather report it out of bordering Unit 13 with no closed season no tag required.

Many of the large grizzly bears do not become an issue until the late spring during the weeks; the end of May through mid-June. At which point the general season is closed to the taking of grizzly bears. The prime majority of trail/game cam photos of grizzly on a bait site in these areas is June 6 - June 26; the unburned corridor of available green access for the bears; due to spring melt/run off and a combination of frozen ground with nowhere for the water to drain, the low levels and flats of both Units 20A and 20C during the months of May are commonly under 1-3 foot of standing snow melt. Hunter accessibility is extremely difficult and limits hunting activist to the mountain region of Unit 20A to the west along the Wood River CUA up to the boundary of Denali National Park.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Grizzly bear populations are currently on a rise within Unit 20. There has been no population surveys completed on Unit 20 since 1995,

and the current numbers of bears are widely unknown within this region. However in the last few years alone, the recorded harvest data has seen a substantial increase in the subunit 20A alone. Between 1999 and 2005, an average of 10-13 bears were harvested per regulatory year. Between 2006 and 2009 that reported harvest is 23-26 bears per regulatory year. Bear sightings and damages by grizzly in the region have also increased with the harvest.

Bear human conflicts are on the rise, in a large portion of Unit 20A, and expected to increase due to the 2009 fire season. It is common for bears to avoid newly burnt areas and travel around them. The fires in Units 20C and 20A in the 2009 summer season left a small corridor of unburned growth for the bears to travel through. This corridor is widely populated by rural residents and home stead communities along the parks highway.

It is also expected that increased bear traffic in these rural areas will also increase the non-reported bear harvest due to rural, DLP or other harvest.

Spring black bear hunters have already seen a substantial decrease in black bears on the bait sites and a very substantial increase in grizzly bear activity on the bait sites, with some sites seeing as many as 20 different grizzly bears. The Department of Fish and Game's (department) last project population put the grizzly population at about 250 bears for Unit 20A. This estimate would put nearly 5 percent of all Unit 20A bears in one bait site in the spring. While similar bait sites across the Unit are seeing collaborating results in grizzly activity. In the last two years, many black bear baiting sites that have traditionally been productive for black bear harvest; have been devoid of all black bears due to the amount of grizzly activity. Though it is uncommon for both black and grizzly bears to frequent that same site simultaneously, it is believed the sheer numbers of grizzly in these areas has pushed the black bears out of the region.

Black bear populations projected in the 2002 (July 1998-June 2001) department report for Units 20A, B, C, and F of 34,079 miles<sup>2</sup> indicates black bear populations were already considered low for the Tanana flats portion of Unit 20A with "population status and trend" were relatively low compared to other areas survey with a population of 500-700 bears for the whole of Unit 20A (black bear management report of survey-inventory activities, 1 July 1998 - 30 June 2001). This current trend of grizzly predation and encroachment is also against the management direct of the same report. (Protect and maintain the black bear population and its habitat in concert with other components of the ecosystem).

While page 27 of the brown bear management report 1 July 2000 - 30 June 2002, population and size density "the Tanana flats in Unit 20A provide relatively poor grizzly bear habitat". Black bear bait stations as far out into Unit 20A along the wood river tributary and Tanana River have been decimated by grizzly populations and several have reported NO black bears in two years

Grizzly bear harvest has been set at a sustainable limit due to road accessibility of Unit 20A; Unit 20A is bordered on a small portion of its western edge by the Parks Highway. This corridor is also 90 percent+ privately owned land along the communities of Healy, Anderson, Clear AFB, Nenana, as well as native, and Alaska Railroad lands...motorized access into Unit 20A is limited to two primary locations along the Rex Trail system and the Ferry Trail Management Area. With the FTMA bordered on two sides by the Wood River Controlled Use Area (CUA) and

Yanert CUA, as well to include an archery only area of the Lignite CUA near Healy (as defined by 5AAC.92.540). The sustainable harvest and dates for the season have not met, or kept the limit in place for the bear populations. Many of these Interior grizzly bears frequenting the populated areas are reaching coastal brown bear proportional size of 8-10 foot in size. Many of these bears are traveling across from another widely inaccessible Unit of 20C of which nearly one-third is National Park in which hunting is not allowed. Further, Unit 20A has the two large Control Use Areas that prevent hunter accessibility into the furthest regions of the Unit.

It is unlikely that Unit 20A or Unit 20C can be over-harvested of grizzly bears due to the fact that annual moose harvest quota's of the intensive management "any bull tags or prescribed cow hunts" are not getting met due to access restrictions and limitations. Much of both Units are accessible by fly in only. It is likely however that the grizzly bear population if left unchecked will continue to grow into troublesome proportions.

Moose calf recruitment is still at a low in Units 20A and 20C, grizzly predation will continue to rise with the bear population, and continue to decline in that calf population will also encourage the further roaming of large bears into populated areas, again increasing human bear interface.

Finally what will happen if nothing is done? The managers of this resource will continue to receive poor and incorrect data of the harvest of these animals as hunters, homesteaders and outdoor enthusiast take matters into their own hands and start eliminating grizzly bears of all ages. With this poor data, the managers will continue to lean toward the conservative side of management, and it is more likely that we will create a secondary intensive management predator control area similar to Unit 16 with a dramatic decrease in the moose population that has currently just reached a sustainable limit under its own intensive management plan.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Not immediately however this is not for improving the bear resource but to reduce the human bear conflict that is due to arise with the million acres burned in 2009 within and surrounding these Units. Alaska Fire Service- (AFS) TAD (Tanana Zone) 43 fires totaling 807,390.7 acres. State of Alaska (DOF) FAS (Fairbanks) 66 fires totaling 649,468.5 acres for a combined 1,456,859.2 acres of which 1,173,944.1 acres directly affected Units 20A and 20C. (Alaska Interagency Coordination, Center Situation Report, Monday - 11/09/2009.) Though long term results are likely to improve diversity of various game populations.

**WHO IS LIKELY TO BENEFIT?** All rural residents living within the regions of Units 20A and 20C, though much of these Units are remote and inaccessible; there are many homestead communities and remote parcels and cabins off the road system between Denali National Park and Nenana. All hunters that would harvest a grizzly bear during the season, as well as all hunters that utilize these Units for other game harvest such as moose and black bear. Fish and game wildlife managers are likely to regain some of the public trust in listening to the public concerns and observation in term to these population issues expounded by the managers complete lack of current data for the population size or studies to gather that data. The residents, miners, farmers, homesteaders, visitors, and hunters, are the only variable source of ~accurate population size.

**WHO IS LIKELY TO SUFFER?** It is unlikely any one group will actually suffer outside of animal rights activists, as Units 20A and 20C are largely unknown and unvisited Units outside of the Denali Park boundaries, the park being the primary attractant to the area. With a lack of ready access major navigable or popular water way with little seasonal fishing or other attractant into the areas, these units are largely visited only by Alaskan hunters and rural residents, seasonal mining operation during the spring/summer black bear season and fall moose and caribou season.

**OTHER SOLUTIONS CONSIDERED?** 1.) Leaving the status quo, though a consideration is rejected as the current 2009 fire status, the substantial increase in population size and harvest, and the data regarding the 2005/2006 fire seasons out of Fairbanks DLPs makes leaving the status unchanged an unacceptable option. 2. Allow black bears baiters to take a grizzly over bait through a viable option; this proposition is for two subunits 20A and 20C, with 20A having a large population of rural residents along the road system. Baiting is not an option within this subunit. As baiting typically results in the larger male bears being harvested and there is anecdotal data to show that harvest of large male bears actually increase the bear population through increased cub survivability. When the intent is to reduce the bear population back to the manageable limit with a decrease in human bear conflict, and increase the actual reported harvest.

**PROPOSED BY:** Vince Holton

**LOG NUMBER:** HQ-10S-G-025

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**PROPOSAL 32 - 85.045. Hunting seasons and bag limits for moose.** Modify the antler restriction for moose in Unit 20A as follows:

Change the hunt for bulls to **36 inches and two brow tines**; no bulls under 36 inches shall be taken.

**ISSUE:** Delete the spike-fork fifty-inch and three brow tines and change it to “36 and two brown tines.”

**WHAT WILL HAPPEN IF NOTHING IS DONE?** With the spike-fork fifty or three brow tines, we are killing off the genes of the three and four brow tine moose in the Tanana Flats. And if we keep killing the spike-forks, we will not have bulls to regenerate our moose population in the Tanana Flats.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** It addresses the bull hunt in the Tanana Flats that was any bull and brings it back to where it should be any bull. If we went back to any bull right now, we would have a slaughter out there because the bulls have figured out that we can shoot the cows and not the bulls.

**WHO IS LIKELY TO BENEFIT?** The people that harvest moose in the Tanana Flats.

**WHO IS LIKELY TO SUFFER?** No one would suffer except trophy hunters

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Lee Olsen

**LOG NUMBER:** I-10S-G-009

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**PROPOSAL 33 - 85.045. Hunting seasons and bag limits for moose.** Allow the taking of moose calves in Unit 20 as follows:

Change the legal animal in antlerless hunts.

Where appropriate for Unit 20 antlerless hunts: One antlerless moose by permit. [HOWEVER, NO PERSON MAY TAKE A CALF OR A COW ACCOMPANIED BY A CALF.]

**ISSUE:** Calves or cows accompanied by calves are not allowed to be taken in antlerless moose hunts in Unit 20. This requires antlerless moose hunters to establish that a cow is alone prior to her harvest. Since this regulation has been implemented, there have been several reported and likely many unreported instances of hunters who have mistakenly shot cows they believed to be without calves. This regulation places an undue burden and restriction on antlerless moose hunters. In other areas with (Units 5, 7, and 14) antlerless hunts, calves and cows accompanied by calves are legal. There is no biological reason why calves or cows accompanied by calves should not be legal in antlerless hunts.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Antlerless hunts with this restriction will continue and there will be hunters who receive fines and violations needlessly. Harvest levels of antlerless moose will remain lower than management goals.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** All antlerless moose hunters.

**WHO IS LIKELY TO SUFFER?** That section of the public or hunters that believe it is wrong to harvest calf moose, irrespective of biological concerns or management objectives.

**OTHER SOLUTIONS CONSIDERED?** Consideration was given to other options to legalize calf harvest. One option would be to have a drawing permit that is applied for as a party and the bag limit would be a cow/calf pair. This was rejected due to the necessity for creating another drawing hunt in a Unit that already has numerous moose drawing hunts. This option would also still allow existing antlerless hunts to continue with existing restrictions.

**PROPOSED BY:** Valerie Baxter

**LOG NUMBER: I-10S-G-035**

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**PROPOSAL 34 - 85.045. Hunting seasons and bag limits for moose.** Manage the moose hunt in Unit 20A with certain permit and registration hunts as follows:

When the bull to cow ratios exceed intensive management objectives, the Department of Fish and Game will issue "any bull" registration permits. To avoid social and potential safety issues, the department will issue registration permits prior to, during, or after the general season hunt begins and/or ends.

**ISSUE:** Increase hunting opportunities by maintaining the 1000 "any bull" drawing permit hunt and authorizing the department to establish an "any bull" registration hunt. Registration hunts can be closed by emergency order and may not even be issued when the bull to cow ratio falls below intensive management objectives.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Loss of hunting opportunities for those who are not lucky enough to receive an "any bull" drawing permit.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal improves the quality of the hunt and increases hunting opportunities for sportsmen by taking advantage of increased bull to cow ratios and provides the department with another management tool to help manage moose populations in the Unit 20A.

**WHO IS LIKELY TO BENEFIT?** Hunters who are not lucky enough to obtain a drawing permit.

**WHO IS LIKELY TO SUFFER?** No one will suffer if this proposal is adopted.

**OTHER SOLUTIONS CONSIDERED?** I originally thought about proposing to have antler restrictions lifted for Unit 20A. After careful consideration, this proposal would have taken away a valuable management tool for the department biologists and would allow hunters to potentially eliminate an entire gene pool.

**PROPOSED BY:** Larry Kappel

**LOG NUMBER: I-10S-G-043**

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**PROPOSAL 35 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify the antler restrictions in Unit 20A as follows:

Unit 20A residents: Wood River Controlled Use Area and Yanert Controlled Use Area,  
1 bull, September 1 - 25.

Remainder of Unit 20A, 1 bull with spike-fork or 50-inch antlers or 3[4] or more brow tines

on at least one side.

Unit 20A nonresidents, 1 bull with 50-inch antlers or 3 [4] or more brow tines on at least one side.

**ISSUE:** Bull:cow ratio is up and the population can withstand a limited increase in the harvest of bulls.

**WHAT WILL HAPPEN IF NOTHING IS DONE?**

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. Less hunting restrictions on bulls will result in a limited increase in harvest which will help overall herd numbers.

**WHO IS LIKELY TO BENEFIT?** Moose hunters in Unit 20A.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Any bull- rejected this because it would result in extreme over harvest in unit 20A.

**PROPOSED BY:** Brent Keith

**LOG NUMBER:** HQ-10S-G-13

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**PROPOSAL 36 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Require nonresidents to hunt with guides or 2<sup>nd</sup> degree of kindred in Unit 20A as follows:

Nonresidents who hunt moose in Unit 20A must be accompanied in the field by an Alaskan licensed guide or an Alaskan resident 19 years or older within the 2nd degree of kindred. Expand 2nd degree of kindred to include aunt & uncle.

**ISSUE:** Rising conflicts between transported drop off or do-it-yourself nonresident and resident hunters. Rising numbers of sublegal bulls harvested by nonresidents.

**WHAT WILL HAPPEN IF NOTHING IS DONE?**

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes.

**WHO IS LIKELY TO BENEFIT?** Resident moose hunters.

**WHO IS LIKELY TO SUFFER?** Do-it-yourself nonresident moose hunters that are not within the 2nd degree of kindred.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Brent Keith

**LOG NUMBER:** HQ-10S-G-014

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**PROPOSAL 37 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify the muzzleloader season and antler restrictions in Unit 20A as follows:

Unit 20A, muzzleloader hunt, resident and nonresident hunters: **September 1 - September 25** [NOVEMBER 1 - NOVEMBER 30].

Residents: One bull by muzzleloader only by permit.

Nonresidents: One bull with 50-inch antlers or antlers with **3** [4] or more brow tines on at least 1 side by muzzleloader only by permit.

**ISSUE:** Moose muzzleloader hunt in Unit 20A.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Conflicts with trappers and residents of the permitted area.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Muzzleloader moose hunters, trappers, and residents of the permitted area.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Brent Keith

**LOG NUMBER:** HQ-10S-G-15

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**PROPOSAL 38 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify the antler restrictions in Unit 20A as follows:

Modify the DM768 and DM770 any-bull tags to read:

One bull; except those bulls that meet the definition of spike-fork or those bulls have four or more brow tines on one side. (DM770) or three or more (DM768).

And that;

(a) Recipients of these any-bull tags may not hunt a bull under general harvest tags in these draw zones, or

(b) Recipients of these any-bull tags may not hunt with a general harvest ticket in any other hunt (thus requiring utilization of these tags until herd stabilization occurs.)

It should be further recommended that any-bull tags throughout Unit 20A be used to harvest mid-range moose that are unavailable to general harvest tag holders. In particular, drawing hunts 769/771/772/773/774 that has a limited hunter access, and higher availability of tags. To help balance the bull-cow ratio and calf recruitment, by removing the less desirable bulls from the herd.

**ISSUE:** Increasing numbers of moose hunters and applicants for draw tags in Unit 20A in zones adjacent to the Parks Highway corridor, in combination with the different general harvest (spike-fork/50" or four brow tines) and any-bull draw harvest regulations, has resulted in declining opportunities for hunters under the general harvest regulations because many of those with an any-bull tag can and do take moose (spike-fork/50" or equivalent brow tines) that are only legal under the general hunt regulations.

- Under the general harvest, Unit 20A has antler restrictions of spike-fork/50" or for or more brow tines on one side, Ferry Trail Management Area, or three or more brow tines, Remainder 20A.
- The intensive management plan has resulted in a large population of mid-range sub-legal bull moose that are unavailable to general harvest tag meat hunters under the current antler requirements.
- 1000 draw tags for any bull were issued for Unit 20A in 2009.
- DM768 (any-bull) had 55 draw tags available in 2009; with 1001 applicants and a 5 percent average draw success. (Four brow tines area).
- DM770 (any-bull) had 85 tags available in 2009; with 1600 applicants and a 5 percent average draw success. (Four brow tines area)

I suggest modifying the two highly sought after any-bull tags (DM768 and DM770) in the most accessible areas of Unit 20A, so that these any-bull tag holders cannot take spike-forks or moose with (four) DM770 and (three) DM 768 or more brow tines on one side, to maximize the general harvest opportunity and better meet the intensive management plan harvest objectives.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** 1) General harvest opportunity will continue to decline. 2) Local rural meat hunters will continue to have low possibility to successfully draw an "any-bull" tag. Though every individual hunter has the same chance at a draw, local rural hunters are severely outnumbered by non-local urban applicants. 3) Community sharing of meat by the rural local hunters will continue to decline with reduced opportunity for legal moose under the general season harvest tag. 4) Conflict between general harvest tag holders and any-bull tag holders may increase as hunters see antler-restricted moose harvested by hunters that may harvest any moose that falls within the wider range of non-legal moose. 5) The bull:cow ratio will continue out of balance by leaving the less desirable younger moose in the herd population, and possibly have a further impact on already poor calf recruitment.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, the genetic base of this herd is out of whack and there are more medium-sized moose with two-three brow tines that will never reach four brow tines or get larger than 50 inches. By encouraging hunters to remove these younger mid-range moose, and having a balance of older mature bulls with younger bulls and cows it will balance the bull:cow

ratio, promote growth of the herd and calf recruitment. It will give visitors to these regions a wider variety of moose to view and photograph, whereas currently there are mostly 20 – 40 inch bulls with odd antler configurations. It will increase opportunity for both sport/trophy hunters and meat/subsistence hunters by making the modified any-bull hunt into a meat hunt, thus allowing for a better quality hunt for all spectrums of hunters.

**WHO IS LIKELY TO BENEFIT?** All hunters will likely benefit: Modified any-bull draw tag winners will still have a large population of moose to harvest from, as there are more mid range moose than small moose and large moose combined. General season harvest tag holders will have assurance that the current lower density of legal-sized antlered moose will not be harvested by those holding any-bull tags, thus increasing the general hunt opportunity to harvest a bull. Draw tag applicants may see a better percentage of availability of this coveted bull tag due to a minimal reduction in applicants for these two tags. Some applicants may not enter as they seek trophy size antlers and draw a tag as a last resort. Thus allowing a great range of hunters to be eligible. Trophy hunters will see an increase in antler rack size as the herd genetics balance out. There will be more large moose, as well more moose available as directed under the current intensive management plan. The limits placed on these modified any-bull tags will encourage the tag winners to actually hunt these tags rather than harvest a moose elsewhere, thus creating another opportunity for another hunter. In short, a tag drawn and not hunted is a lost opportunity to other hunters. Especially when the tag winner harvests a moose elsewhere on a general harvest tag.

**WHO IS LIKELY TO SUFFER?** Initially, any-bull draw tag winners will feel they are being put out as they wish for a true "any-bull" tag. They will no longer be able to shoot the "first" antlered bull they see. However these two affected tags are predominantly in high moose population areas during the pre-rut and it is common to see several moose at one time. And moose considered "sub-legal" under the current regulations are commonly found in twos and threes. And by having a brow tine limit rather than a size limit, draw tag winners may still hunt a 60" moose as long as it has fewer than four brow tine on any side.

Trophy hunters will not have the option of drawing an any-bull tag and searching for a large Boone & Crocket moose at the same time. Some hunters will have to decide if they want to hunt for meat or trophy animal, or decide if they will hunt elsewhere prior to filling out the draw.

**OTHER SOLUTIONS CONSIDERED?** 1.) Increasing hunter opportunity by reducing brow tine restrictions from four to three brow tines...this has been done with success for short periods in the past, however due to high hunter numbers and impact upon the herd the four brow tine rule has always been reinstated within a year or two. Hunter density and competition is extremely high in these zones of Unit 20A. 2.) Returning to a ONE BULL limit as in Unit 20B, with a shortened hunt period was also discussed, and immediately rejected, as the cover for moose is dramatically different between Unit 20A and 20B and with the current hunter densities in Unit 20A this could result in a more crowded hunt with a potential over-harvest within a few days of the season. This could be a possibility in the furthest reaches of Unit 20A where hunter access is limited and harvest quotas are not being met. 3.) Requesting a higher number of draw permits. This was also dismissed as the current draw is for 1000 permits and less than 50 percent of them were hunted in 2009. Increase in permits will not help balance the opportunity for those that do

not get drawn. 4.) Including moose OVER 50-inches was originally considered to be applied to this permit change. However, there are already enough hunters trying to decide if a moose is large enough...another group trying to decide if the moose is small enough seems unreasonable and unjustified. By limiting the draw tag winner to fewer than four brow tines this will still allow for large moose to be taken with a draw tag, just with fewer brow tines and less trophy value for those inclined hunters. Through draw tag winners should still be encouraged to take the smaller moose, or not apply if looking for large antlers to hang on the wall. 5.) Including all Unit 20A any-bull tags was also considered, and tabled at this time. DM768 and DM770 are the two draw tags with the highest concentration of hunters, and sheer number of applicants. The remaining tags have a lower success rate due to unit/zone access along with a much higher number of tags available, and increased hunter success in drawing those tags. This option is still available if it will assist the biological integrity of the zone by requiring a hunter to take a mid-sized moose rather than let it walk in hopes of a larger moose and then the chance of not harvesting any moose at all while in the field.

**PROPOSED BY:** Vince Holton

**LOG NUMBER:** HQ-10S-G-24

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**PROPOSAL 39 - 5 AAC 85.045 (18). Hunting seasons and bag limits for moose.** Close the muzzleloader hunt in Unit 20A; open a muzzleloader hunt in Unit 20B as follows:

Delete the muzzleloader hunt (DM766), for both residents and nonresidents in Unit 20A and establish a November muzzleloader hunt in Unit 20B.

**ISSUE:** I would like to see the muzzleloader moose hunt in Unit 20A (DM766) eliminated and a new muzzleloader hunt established in Unit 20B. This hunt, in Unit 20A, was established in 1994, but suspended in years 2000 thru 2004 due to low bull to cow ratios. The hunt is limited to the Ferry Trail Management Area, Wood River Controlled Use Area and the Yanert Controlled Use Area. The muzzleloader hunt takes place in the entire month of November, and historically has been an ATV and snowmachine hunt, but mostly snowmachines.

When this hunt was established, this particular hunt area was receiving very little fly-in, foot, ATV, and/or snowmachine activity. When the aggressive antlerless hunts started in 2004 the area of this muzzleloader hunt, in general, and the area around Gold King in particular receives an enormous amount of traffic. This massive increase in hunter pressure, and vehicle traffic starts the last week of August, and runs until the end of February--more than five months, of hunting pressure and traffic. ATV's, Argo's, snowmachines, and Knodwells, and the like cannot access the CUA until October 1, but starting then, they all have free access to the area.

Moose start moving out of the Tanana Flats and into the foothills of the Alaska Range, to the south, starting around the middle of July. They are generally finished migrating by the middle to end of October. During this migration, many of them must run the gauntlet hunters and vehicles traveling the Rex Trail, starting in late August.

I am not a game biologist, however I have hunted this area for over 30 years, and have been fortunate enough to draw this hunt in the past. Not more than 4-5 years ago, it was not uncommon to see herds of 100-200 moose in some of the foothill valleys in the areas we are discussing. It was a hunt that had the reputation of being a "trophy hunt" as moose were herded up for the winter. In the last three years a muzzleloader hunter is lucky to find any legal bull, during the month that the hunt is open. I believe that this is partly due to moose moving out of the area, to get away from the traffic and pressure, and partly due to the accessibility of the area, along the Rex Trail during the five months that seasons are open in that area.

Another reason for moving the hunt is the impact it is having on the trappers in the area. Trapping seasons in Unit 20A generally also start on November 1. As this hunt has gained popularity, more and more people have applied for the hunt and the percentage of hunters that draw, and that actually participate, has gone up, but that generally is driven by the weather conditions during that month. So, what happens is the hunters generally travel down the Rex Trail, on snowmachines, to the Gold King area and end up traveling "cross country" on the trappers trails, ruining the trappers sets. According to the trappers, this is happening even though the traplines are well marked.

Muzzleloader hunters drawing this hunt almost never venture out on that hunt alone, because the temperatures run from zero to 40 below, and there is only about four hours of daylight. They usually have two-four friends accompanying them, thus increasing the snowmachine traffic. As a result, in the last few years the main trapper in the Gold King area does not even bother to put out traps until the muzzleloader season ends. In the past, this trapper was the main method of predator control in that foothills area, but much of that has changed because of the traffic caused by this hunt in November. Additionally, at least for that one trapper who is a full resident in the Gold King area, trapping is the family's main source of income, and that income has been drastically reduced due to his inability to trap in November.

The total numbers of moose in Unit 20A, since implementation of the antlerless hunts in 2004, have steadily decreased, and the survey in 2008 indicated approximately 12,500 moose, which is near the upper end of the Intensive Management (IM) goal. However, the count in Unit 20B was over 16,000 moose, prompting the department to implement a more aggressive and expanded antlerless hunt this year, and expanded "any bull" hunts.

Terminating the hunt in Unit 20A would have little to no impact on the total bull harvest. For one thing, there are very few permits distributed for this hunt (approximately 75 in the past and 40 last year), and historically less than half of those that do draw, actually go on the hunt. Once again that usually depends on the November weather conditions. This is really an "allocation issue" for, if the hunt is terminated in Unit 20A, and the department determines that it still wants more bulls taken in that area the department can just add additional "any bull permits" to that Unit if they feel it will be needed (depending on the fall survey).

There are a lot of good reasons to establish this hunt in Unit 20B. Moving the hunt to Unit 20B would vastly improve access to the hunt, in most cases. This year is a good example. In order to travel the Rex Trail, to the Wood River Controlled Use Area, and/or the foothills around Gold King, you must cross two large rivers, and a couple of smaller ones. As of November 10 this

year the trail was usable by track rigs but still not passable by snowmachines, due to flowing rivers and the lack of snow cover. Later in November daylight hours are reduced to 3-4 hours, so many of the hunters would prefer to hunt earlier in the month. There are several roads through Unit 20B and much of the Unit could be accessed off the road system by either ATV or snowmachine starting November 1. The other reason is, as mentioned above, the moose population in Unit 20A is falling at a good rate, while the population in Unit 20B has exploded in the past two years.

I have participated in this hunt in the past, and am not advocating the elimination of the muzzleloader hunt. It is a popular specialty hunt that allows opportunity for a different group of hunters and should be continued in Unit 20B.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Trapping predators in Unit 20A will continue to be hindered, and the income of trappers in that area will continue to be drastically reduced. Access to one of the main areas for the muzzleloader hunt will continue to be a problem, especially if the trend towards warmer temperatures in the first part of November continues.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Better access and higher numbers of moose in Unit 20B should allow a higher success rate for the hunt, as Unit 20B is generally accessible by ATV and/or snowmachine from several roads in the unit for the entire month of November.

**WHO IS LIKELY TO BENEFIT?** The trappers in Unit 20A will benefit by being able to trap the entire month of November. Muzzleloader hunters should benefit from the higher moose numbers in Unit 20B, and increased access in the Unit.

**WHO IS LIKELY TO SUFFER?** The only people that might possibly suffer would be any of the four-five full time residents of the Gold King area that might apply for, and be drawn for the hunt as it now stands. Also, if hunters from the Southcentral part of the state draw the hunt, they would have to drive a little farther before starting their hunt.

**OTHER SOLUTIONS CONSIDERED?** Eliminate the hunt in Unit 20A, and not establish it somewhere else - not considered because it is a popular hunt, and offers a hunt opportunity for a different category of hunter.

**PROPOSED BY:** Larry Dalrymple

**LOG NUMBER:** HQ-10S-G-012

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**PROPOSAL 40 - 5AAC 85.045(a)(18). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in Unit 20A as follows:

**Resident Open Season**

Units and Bag Limit	(Subsistence and General Hunts)	Nonresident Open Season
...		
(18)		
Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area		
RESIDENT HUNTERS:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side; or	Sept. 1 - Sept. 25 (General hunt only)	
1 antlerless moose by drawing permit only; up to <b>1000</b> [500] permits may be issued; a person may not take a calf or a cow accompanied by a calf; a recipient of an antlerless drawing permit is prohibited from taking a bull moose in Unit 20(A); or	Aug. 25 - Oct. 31 (General hunt only)	
1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf; or	Jan. 10 - Feb. 28 (General hunt only)	

1 bull by drawing permit only; up to 1,000 permits may be issued; or

Sept. 1 - Sept. 25  
(General hunt only)

1 bull by drawing permit only; by muzzleloader only; up to 75 permits may be issued

Nov. 1 - Nov. 30  
(General hunt only)

NONRESIDENT  
HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side; or

Sept. 1 - Sept. 25

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; by muzzleloader only; up to 75 permits may be issued

Nov. 1 - Nov. 30

Remainder of Unit 20(A)

RESIDENT HUNTERS:

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1 - Sept. 25

1 antlerless moose by drawing permit only; up to **1000** [500] permits may be issued; a person may not take a calf or a cow accompanied by a calf; a recipient of an antlerless

Aug.25 - Oct. 31  
(General hunt only)

drawing permit is prohibited from taking a bull moose in Unit 20(A); or

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf; or

Aug. 25 - Feb. 28

1 bull by drawing permit only; up to 1,000 permits may be issued

Sept. 1 - Sept. 25

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side

Sept. 1 - Sept. 25

...

**ISSUE:** Antlerless moose hunting seasons must be reauthorized annually.

The purpose of antlerless moose hunts in Unit 20A is to regulate population growth, to meet the Intensive Management (IM) mandate for high levels of harvest, and to provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses in Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats). The Division of Wildlife Conservation's (division) overarching goal is to protect the moose population's health and habitat over the long term. The number of moose in Unit 20A was estimated at 16,000–18,000 (3.2–3.6 moose/mi<sup>2</sup>) in 2003. Research indicated this high-density moose population was experiencing density-dependent effects, including low productivity, relatively light calf weights, and high removal rates of winter forage.

Our objective beginning in regulatory year (RY) 2004 (RY begins 1 July and ends 30 June, e.g., RY04 = 1 July 2004 through 30 June 2005) was to reduce moose numbers to the population objective of 10,000–12,000 moose (2.0–2.5 moose/mi<sup>2</sup>). The fall 2008 population estimate was 12,537 (11,104–13,969; 90 percent Confidence Interval) moose. We recommended a harvest of 175 antlerless moose in RY09, which is an estimated harvest rate of 1.3 percent of the prehunt moose population. This harvest rate is expected to result in population stability, based on harvest rates and population trends observed between RY96 and RY08.

The Unit 20A antlerless moose hunt provides additional harvest opportunity which helps to meet human consumption interests and intensive management (IM) harvest objectives. In addition, this hunt has been successful in reversing moose population growth and in increasing moose harvest and hunter participation.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** This moose population may again increase, which would likely result in further deterioration of the habitat and exacerbate a population decline in years with severe winter conditions. The opportunity to hunt a harvestable surplus of cow moose would be lost and our ability to meet intensive management harvest objectives would be compromised. Subsistence hunters in the portion of Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** This reauthorization of antlerless moose hunts will likely improve or maintain the ability of moose habitat to support the current moose population. The additional harvest will help in meeting intensive management harvest objectives.

**WHO IS LIKELY TO BENEFIT?** Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by having moose densities compatible with their habitat.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-070

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**PROPOSAL 41 - 5AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the resident muzzleloader season for moose in Unit 20B as follows:

Increase the season to run October 1 – November 30.

**ISSUE:** I would like to see the Board of Game adjust the length of the season for the established muzzleloader hunt in the Creamers Field Wildlife Refuge Area.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** We will forgo additional moose meat harvest opportunities due to the existing very short season and miss an opportunity to provide more hunting opportunity to hunters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This hunt would allow moose harvest in an area that has such a short window of opportunity, if you don't harvest a "resident moose" in the immediate area, it

doesn't really allow for harvest of "transient moose" that may move through the area. Increasing the duration of the hunt this time of year will minimize conflicts with most other users and allow for potentially better meat care due to cold weather and cleanliness of butchering on snow and facilitating easier meat retrieval with the use of snow machines and sleds. Snowmachine sleds enable the hunter to retrieve much more of the harvested moose including heads for meat, hides and organ meats that are commonly left in the field at other times of the year due to either warm weather or transport difficulties.

Muzzleloader certification requirement for muzzleloader hunts ensures more responsible hunting activity and has also become easier for all hunters to get since the establishment of an Alaskan online muzzleloader course option.

**WHO IS LIKELY TO BENEFIT?** The hunting public would benefit by having more opportunities to hunt, easier access to difficult areas, more meat harvest from the Unit, spread the hunting pressure out, and allow for more complete utilization of the moose carcass if wanted.

**WHO IS LIKELY TO SUFFER?** None foreseen

**OTHER SOLUTIONS CONSIDERED?** Other solutions considered were to offer this as an any weapon hunt. This option was rejected because the lower success rate of hunting with the muzzleloader provides more hunting opportunity to more hunters for the same harvest rate.

**PROPOSED BY:** Mike Brase

**LOG NUMBER:** HQ-10S-G-032

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**PROPOSAL 42 - 5AAC 85.045(a)(18). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in Unit 20B as follows:

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(18)		
...		
Unit 20(B), that portion within Creamer's Refuge		
1 bull with spike-fork or greater antlers, by	Sept. 1 - Sept. 30 (General hunt only)	Sept. 1 - Sept. 30 Nov. 21 - Nov. 27

bow and arrow only; or

Nov. 21 - Nov. 27  
(General hunt only)

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or

Sept. 1 - Nov. 27  
(General hunt only)

Sept. 1 - Nov. 27

1 antlerless moose by muzzle-loader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area

Nov. 21 - Nov. 27  
(General hunt only)

Nov. 21 - Nov. 27

Unit 20(B),  
remainder of the  
Fairbanks  
Management Area

1 bull with spike-fork or greater antlers, by bow and arrow only; or

Sept. 1 - Sept. 30  
(General hunt only)  
Nov. 21 - Nov. 27  
(General hunt only)

Sept. 1 - Sept. 30  
Nov. 21 - Nov. 27

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 permits may be issued; a recipient of a drawing permit

Sept. 1 - Nov. 27  
(General hunt only)

Sept. 1 - Nov. 27

is prohibited from taking an antlered bull moose in the Fairbanks Management Area

Unit 20(B), that portion within the Minto Flats Management Area

1 moose by registration permit only; or

Sept. 1 - Sept. 25  
(Subsistence hunt only)  
Jan. 10 - Feb. 28  
(Subsistence hunt only)

No open season.

1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side

Sept. 11 - Sept. 25

No open season.

Unit 20(B), the drainage of the Middle Fork of the Chena River

1 antlerless moose by [REGISTRATION BY] drawing permit only; up to 300 permits may be issued; a person may not take a calf or a cow accompanied by a calf; or

Aug. 15 -Nov. 15  
(General hunt only)

No open season.

1 bull; or

Sept. 1 - Sept. 20

Sept. 1 - Sept. 20

1 bull, by bow and arrow only

Sept. 21 - Sept. 30

Sept. 21 - Sept. 30

Unit 20(B), that portion of the Salcha River drainage upstream

from and including  
Goose Creek

1 bull; or	Sept. 1 - Sept. 20	Sept. 1 - Sept. 20
1 bull, by bow and arrow only	Sept. 21 - Sept. 30	Sept. 21 - Sept. 30
Remainder of Unit 20(B) 1 bull; or	Sept. 1 - Sept. 15	Sept. 5 - Sept. 15
1 antlerless moose by drawing permit only; up to 900 permits may be issued; a person may not take a calf or a cow accompanied by a calf	Aug. 15 - Nov. 15 (General hunt only)	No open season.

...

**ISSUE** Antlerless moose hunting seasons must be reauthorized annually.

*Fairbanks Management Area (FMA)* – The purpose of this antlerless hunt is to provide opportunity to harvest a surplus of antlerless moose in the FMA and potentially reduce moose–vehicle collisions and nuisance moose problems.

Based on our November 2008 survey, the moose population in the FMA is approximately 505 moose (1.7 moose/mi<sup>2</sup>). The number of moose–vehicle collisions in the FMA are high and pose significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest and reduce moose–vehicle collisions, the department increased the number of drawing permits for antlerless moose by archery hunting only (DM788) incrementally from 25 in 1999 to 150 in 2004. However, antlerless harvest did not increase as much as anticipated (11 to 49) with increases in the number of permits issued. Therefore to further increase harvest to meet management goals the board expanded the season beginning in 2006 from September 1–30 and November 21–27 to September 1–November 27, and the bag limit was changed to any antlerless moose. The reported harvest for hunt DM788 averaged 49 antlerless moose (range 42–56) during RY06–RY07. Moose–vehicle collisions and moose nuisance problems have declined during RY06–RY08, presumably, in-part due to the higher antlerless moose harvests. However, the DM788 harvest fell to 14 in RY08 after permits were reduced by 50 percent and the bag limit was restricted to cows without calves. RY09 data were not complete at the time this proposal was submitted, however harvest is improving with the restoration of 150 permits and harvest of cows with calves. The preliminary RY09 harvest is 37 antlerless moose.

*Minto Flats Management Area (MFMA)* – The primary purpose of this antlerless hunt is to provide a reasonable opportunity for subsistence uses. In 2004, the board replaced the Tier II subsistence hunt TM785 (100 permits with a bag limit of one moose during September 1–20 and January 10–February 28) with two registration hunts, RM775 and RM785 (bag limit of one moose during September 1–25 and January 10–February 28). In addition, a 15-day general hunt (September 11–25) for bulls (with spike, forked or 50” antlers, or antlers with four or more brow tines) provides hunting opportunity and helps to meet IM harvest objective of 600–1500 moose in Unit 20B.

Population estimation surveys indicate the moose density within the MFMA is high ( $>3.0$  moose/mi<sup>2</sup>). The reported harvest of antlerless moose taken during subsistence hunt TM785 averaged 24 during regulatory years RY96–RY03. The reported harvest for hunts RM775 and RM785 averaged 52 antlerless moose (range 32–71) during RY04–RY08. That harvest represents approximately one to two percent of the MFMA moose population and is likely sustainable.

*Unit 20(B), the drainage of the Middle Fork of the Chena River and the Remainder of Unit 20B* – Deleting the "registration by" codified language is a housekeeping edit to correct a typographical error. The board approved a drawing permit hunt in this area.

The drawing permit hunts for antlerless moose was approved by the board in 2006 to take advantage of relatively high and increasing moose numbers in central Unit 20B. Population estimates (12,313 in 2001; 15,485 in 2003; 16,572 in 2004; 15,986 in 2006, and 17,806 in 2008) and calf:cow ratios (37–43:100 during 2003–2008) indicate numbers are increasing. Moreover, moose densities are relatively high (1.9 moose/mi<sup>2</sup>) in central Unit 20B surrounding Fairbanks.

The reported harvest for the central Unit 20B drawing hunts averaged 92 antlerless moose (range 83–101) during RY06 and RY07, but fell to 48 when permits were reduced by 50 percent and the bag limit was restricted to cows without calves in RY08. The antlerless moose harvest in this area is designed to curb growth of this population that has surpassed the upper limit of the IM population objective of 12,000–15,000 moose and helps to meet IM harvest objectives for Unit 20B.

The population was still growing at four percent per year, despite significant roadkill and harvest of almost 200 cows annually, representing 1.1 percent of the prehunt population estimate (18,589 moose). In 2009 the board approved an increase in the cow harvest to about 300, or 1.6 percent of the prehunt population. We then expanded drawing hunt areas and increased the number of permits.

To mitigate hunter conflicts, we spread hunters out over space and time. Our strategy was to learn from and avoid conflicts that developed in recent years in the Units 20A and 20D antlerless hunts. One of the main conflicts was a result of hunter crowding. Therefore, we divided areas of central Unit 20B that contain a surplus of moose into 16 small drawing permit areas based on drainages. Each area has permits in three time periods: one before the general hunt, one during, and one after. This way we maintain fewer than 15 cow hunters at a time in each permit area, yet expect to achieve a harvest of 300 cows.

Mortality from vehicle and train collisions has been high, with an average of 149 moose killed annually by motor vehicles in Unit 20B. By focusing harvest in the more heavily roaded central Unit 20B, road kill may be reduced.

Finally, extensive burns in northcentral Unit 20B will provide excellent habitat in the future. With improving habitat, continued high predator harvest, and relatively mild winters, we can expect continued high productivity and survival of moose, along with increased yield.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** This moose population may increase, which may result in deterioration of the habitat and exacerbate a population decline in years with severe winter conditions. The opportunity to hunt a harvestable surplus of cow moose will be lost and our ability to meet intensive management harvest objectives would be compromised. In central Unit 20B and the FMA in particular, moose–vehicle collisions and nuisance moose problems will likely remain high or increase. Subsistence hunters in the MFMA may not have a reasonable opportunity to pursue moose for subsistence uses.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, hunting opportunity and harvest will increase. This reauthorization of antlerless moose hunts will likely improve or maintain the ability of moose habitat to support the current moose population. It will also allow hunters to increase moose harvest toward the intensive management harvest objective without further reducing the bull-to-cow ratios.

**WHO IS LIKELY TO BENEFIT?** Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Urban residents may benefit from reduced moose–vehicle collisions and moose–human conflicts. Moose populations will benefit by having moose densities compatible with their habitat.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-071

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**PROPOSAL 43 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Allocate a number of antlerless moose permits for a youth hunt as follows:

Two permits from the early (August 15 - August 31) antlerless moose hunts in Unit 20B be designated youth hunts. If successful both youth and adult must punch their tag. The department may fill the permits with adults if not enough youth apply.

**ISSUE:** I would like to see more hunting opportunities for youth.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** There will be more of a lack of interest in the youth and less hunters in the future.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, it gets more people in the field and youth are taught hunting skills.

**WHO IS LIKELY TO BENEFIT?** The youth and the adult who have a nice time in the field.

**WHO IS LIKELY TO SUFFER?** Adults who do not want to take a kid hunting.

**OTHER SOLUTIONS CONSIDERED?** We could let the youth start hunting early but thought that would not be popular with some hunters.

**PROPOSED BY:** John Krieg

**LOG NUMBER:** I-10S-G-005

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**PROPOSAL 44 - 85.045 Hunting seasons and bag limits for moose.** Eliminate antlerless moose hunts in a portion of Unit 20B as follows:

Eliminate the drawing (DM698, DM699, DM700 cow hunts in the west end of Unit 20B.

**ISSUE:**

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Overharvest of cow moose

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes; more cows to breed means more moose.

**WHO IS LIKELY TO BENEFIT?** Moose population; ultimately moose hunters

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Tanana-Rampart-Manley Advisory Committee

**LOG NUMBER:** I-10S-G-007

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**PROPOSAL 45 - 92.530 (8). Management areas.** Restrict the use of motorized vehicles and aircraft for hunting moose in the Minto Flats Management Area as follows:

Wheeled or tracked vehicles, aircraft or airboats may not be used for moose hunting or to transport moose, moose hunters, or moose hunting equipment within the management area.

**ISSUE:** The use of wheeled, track vehicles are showing up in the Minto Flats State Game Refuge

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Desegregation of wilderness and wildlife habitat.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The wildlife are being pushed out of feeding areas where they do not usually go, off the flats and on hills. Resting swans are pushed out of ponds before they are ready, more will gain by this.

**WHO IS LIKELY TO BENEFIT?** All hunters will benefit. The game will not be driven out by a few disrupting their natural habits

**WHO IS LIKELY TO SUFFER?** The person or persons who think that using these machines is the way to hunt regardless of anyone else.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Chris Pemberton

**LOG NUMBER:** I-10S-G-015

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**PROPOSAL 46 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.074. Community subsistence harvest hunt areas.** Establish a community harvest permit hunt for the Village of Minto as follows:

One, any-moose permit per household with a maximum of 50 moose for the village.

**ISSUE:** There are plenty of moose around Minto, but the people of Minto do not want to stand in line for any moose registration permits with non-Minto people. Because of this the people in Minto are not getting the moose they need to fill their subsistence needs.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** People in Minto continue to not have their subsistence needs met.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. Because the people will take only the number of moose they need.

**WHO IS LIKELY TO BENEFIT?** All of the people of Minto.

**WHO IS LIKELY TO SUFFER?** No one because there are enough moose that others can harvest moose as well.

**OTHER SOLUTIONS CONSIDERED?** Return to Tier II, but the board has already rejected this option

**PROPOSED BY:** Village of Minto

**LOG NUMBER:** I-10S-G-020

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**PROPOSAL 47 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify the muzzleloader hunt for antlerless moose in Unit 20B as follows:

Unit 20B, that portion within Creamer’s Refuge, 1 antlerless moose by muzzleloader by drawing permit only; up to ten permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks management area. Season: **November 1 – 30** [NOVEMBER. 21 – 27].

**ISSUE:** Change to the season length for the DM789: Creamer’s Field Migratory Waterfowl Refuge, one antlerless moose by muzzleloader only – ten permits issued. The current season is only seven days long (November 21-27) and is concurrent with bow and arrow only seasons for antlerless and bull moose. The areas of the refuge that are both open to hunting and contain good moose habitat are relatively small and it is difficult for hunters to avoid one another during this short constricted season. These factors have resulted in hunter conflict and limited hunting opportunity on the refuge.

In addition to user conflicts, there is also low hunter success for this hunt. The number of moose that have been harvested (2004-2008) has ranged from zero to three, with an average of 1.4. At these harvest levels, this hunt does not contribute significantly to management goals for the overall Fairbanks Management Area (FMA) and does not contribute to the reduction of moose/vehicle collisions in urban Fairbanks.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Conflicts among hunters will continue and hunting opportunity will remain unnecessarily constricted. Antlerless harvest levels will continue to be below management goals.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** All hunters on Creamer’s refuge will benefit from a lengthening of the DM789 muzzleloader season.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Consideration was given to proposing that the boundaries of the muzzleloader hunt be expanded to include the whole FMA. This solution is proffered in a separate proposal.

**PROPOSED BY:** Valerie Baxter

**LOG NUMBER:** I-10S-G-034

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**PROPOSAL 48 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a muzzleloader permit hunt in Unit 20B as follows:

Hunting Seasons and Bag Limits – Unit 20B:

Drainage of the Middle (East) Fork of the Chena River and/or Salcha River drainage upstream from Goose Creek,

or, Angel Creek drainage;

or, drainages of the South Fork of the Chena River.

Bag limit - one bull (or cow?) by muzzleloader only by permit.

Season dates: November 1 – November 30.

**ISSUE:** I would like to see the Board of Game establish a drawing permit for a winter muzzleloader moose hunt in either the Upper Chena River drainages and/or Upper Salcha River drainages where additional moose harvest as verified by the Department of Fish and Game may be sustained.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** We will forgo additional moose meat harvest opportunities due to the challenges of access during the regular hunting season and miss an opportunity to provide more hunting opportunities to hunters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This hunt would allow moose harvest in relatively difficult access areas at a time of year that will minimize conflicts with most other users and allow for potentially better meat care due to cold weather and cleanliness of butchering on snow and facilitating easier meat retrieval with the use of snow machines and sleds. Snow machine sleds enable the hunter to retrieve much more of the harvested moose including heads for meat, hides and organ meats that are commonly left in the field at other times of the year due to either warm weather or transport difficulties.

Muzzleloader certification requirement for muzzleloader hunts ensures more responsible hunting activity and has also become easier for all hunters to get since the establishment of an Alaskan online muzzleloader course option.

**WHO IS LIKELY TO BENEFIT?** The hunting public would benefit by having more opportunities to hunt, easier access to difficult areas, more meat harvest from the Unit, spread the hunting pressure out, and allow for more complete utilization of the moose carcass if wanted.

**WHO IS LIKELY TO SUFFER?** There is potential for some trappers to find it frustrating to share trails with moose hunters for the first month of the trapping season, but they will also potentially benefit by having gut piles or other legally unharvested parts left behind.

**OTHER SOLUTIONS CONSIDERED?** The solutions considered were to offer this as an any weapon hunt. This option was rejected because the lower success rate of hunting with the muzzleloader provides more hunting opportunity to more hunters for the same harvest rate. Later hunts don't allow for easy sex identification of the moose, and earlier hunts can't be accessed by snow machine. Much of the remainder of the Unit either has subsistence concerns or receives high hunting pressure during the regular or existing drawing permit hunts.

**PROPOSED BY:** Mike Brase

**LOG NUMBER:** HQ-10S-G-027

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**PROPOSAL 49 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish an archery permit hunt for moose in Unit 20B as follows:

Establish a new regulation for a Unit 20B drawing, any moose permit hunt, from Moose Creek Dike to Banner Creek by bow & arrow only, from September 1 through November 30.

Hunt area within 1/2 mile either side of the Richardson Highway to the North bank of the Tanana River whichever is closer.

**ISSUE:** A large number of moose are hit by motorized vehicles each year along the Richardson Highway. People are injured, vehicles damaged, and moose are injured or die from the collision. Often times the resource is lost because the injured animal runs off and eventually dies (no meat is harvested), or the meat is not all salvageable or edible. While all moose/vehicle collisions are not preventable, this proposal, if adopted, should substantially decrease the number of occurrences.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Accidents involving moose and motorists will continue to occur at a high rate and are likely to rise due to an increasing Unit 20B moose population and when the interior has a higher than normal snowfall (moose more frequently use the highway to travel). The incidence of human injury or death is likely to increase, as well as, medical costs, vehicle repair/replacement costs and insurance rates. Moose injuries and death from vehicle collisions will continue at a higher rate resulting in a less than optimal use of this resource.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The new regulation would reduce interaction between motorists and moose by targeting the moose most likely to be involved in motorized vehicle collisions and provide an opportunity to harvest the moose before collisions occur. This option vastly improves the quality of meat harvested and provides additional hunting opportunities.

**WHO IS LIKELY TO BENEFIT?** The general public and locals travelling along the Richardson Highway by reduced chance for vehicle/moose collisions which in turn reduces potential personal injuries and/or death and high medical costs and vehicle repairs. Hunters would gain additional hunting opportunity. Less moose would suffer from injuries sustained by vehicles and the quality of meat harvested would increase.

**WHO IS LIKELY TO SUFFER?** Possibly landowners in the area (e.g. private property issues). However, the locals in the area would also benefit which should offset any negative.

**OTHER SOLUTIONS CONSIDERED?** Unknown.

**PROPOSED BY:** Art Ward and Debra Curnow

**LOG NUMBER:** HQ-10S-G-029

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**PROPOSAL 50 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify the season dates for Unit 20C as follows:

Unit 20C, resident harvest, September 5 – September 25.

Unit 20C, nonresident harvest, September 5 – September 15.

**ISSUE:** Adjust the moose season in Unit 20C to allow hunters to hunt later in the season. Warmer temperatures are making it difficult to keep game meat from spoiling.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** This unit has excellent access, but in order to be successful you must travel deep into the remote areas. With the temperatures that we have experienced in recent years it is difficult to shoot a moose and return to home and minimize wastage.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** I believe by moving the date back by five days more salvageable meat will make it home.

**WHO IS LIKELY TO BENEFIT?** Successful moose hunters.

**WHO IS LIKELY TO SUFFER?** I do not believe that anyone will suffer from this proposal.

**OTHER SOLUTIONS CONSIDERED?** No other solutions considered

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-031

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**PROPOSAL 51 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Delay the moose season in 20C as follows:

Revise the current hunt period of September 1-20 to September 6-25 for subunit 20C.

**ISSUE:** Reduce the potential for damaged moose meat due to hot weather during the first week of moose season.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The potential to lose valuable moose meat to the heat will remain for areas of Unit 20C that are far enough away from boat landing and inaccessible to airplanes.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The quality of moose hunting would still be high. This proposal would help reduce the loss of moose meat due to warm weather in early September.

**WHO IS LIKELY TO BENEFIT?** All Alaskan residents who know how to properly take care of their moose meat without having to break camp early to get their meat to a commercial refrigerator or cooler.

**WHO IS LIKELY TO SUFFER?** No one will suffer from this proposal.

**OTHER SOLUTIONS CONSIDERED?** I did not consider any other solution.

**PROPOSED BY:** Fairbanks Advisory Committee

**LOG NUMBER:** I-10S-G-041

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**PROPOSAL 52 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Expand the moose season in Unit 20C as follows:

Moose, 20C, nonresidents: one bull.....**September 1 - September 20** [SEPTEMBER 5 - SEPTEMBER 15]

**ISSUE:** Alignment of resident and nonresident moose hunting season.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** None

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. It takes some pressure off Unit 20A.

**WHO IS LIKELY TO BENEFIT?** Moose hunters.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Brent Keith

**LOG NUMBER:** HQ-10S-G-016

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**PROPOSAL 53 - 5AAC 85.045(a)(18). Hunting seasons and bag limits for moose.** Remove the prohibition against shooting white moose in Unit 20C as follows:

Units and Bag Limit	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
...		
(18)		
...		
Unit 20(C)	Sept. 1 - Sept. 20	Sept. 5 - Sept. 15
1 bull; [HOWEVER, WHITE-PHASED OR PARTIAL ALBINO (MORE THAN 50 PERCENT WHITE) MOOSE MAY NOT BE TAKEN]		
...		

**ISSUE:** Eliminating this prohibition will simplify the moose hunting regulation in Unit 20C. The department has not documented any white-phased or albino moose in Unit 20C for more than 20 years. In the early 1980s a few white-phased moose were present in the Healy area. Because these moose were located in a highly visible area, they were sought by wildlife viewers and the board passed a regulation to protect them. However, the probability of having a white-phased or albino moose is no greater in Unit 20C than any other area of the state.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunters and wildlife viewers can be confused by the lengthy regulation.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** No, this is an effort to simplify the regulations.

**WHO IS LIKELY TO BENEFIT?** Hunters who are burdened by confusing regulations. Non-hunters who assume the regulation implies there are a number of white moose in Unit 20C may be disappointed to discover there likely are none.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Retain the regulation. This will have no impact on the moose population. However, this regulation is confusing and could be difficult to enforce.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-052

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**PROPOSAL 54 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a muzzleloader season for antlerless moose in the Fairbanks management area as follows:

Unit 20(B), that portion within the Fairbanks Management Area [CREAMER'S FIELD MIGRATORY WATERFOWL REFUGE], one antlerless moose by muzzleloader only permit, DM789, November 1 – 30 [NOVEMBER 21-27].

**ISSUE:** The current antlerless muzzleloader hunt, DM789, is restricted to Creamer's Field Migratory Waterfowl Refuge, is limited to 10 permits, and has a very short seven day season. The areas of the refuge that are both open to hunting and contain good moose habitat are relatively small and it is difficult for bow and arrow and muzzleloader hunters to avoid one another during this short constricted season. These issues have resulted in user conflicts, limited hunter opportunity, and harvest levels that do not contribute to reducing moose/vehicle collisions in the Fairbanks area.

The current Fairbanks Management Area (FMA) bow and arrow only antlerless hunt, DM788, has harvested a range of 27 to 56 moose from 2000 to 2007, averaging 38 antlerless moose annually. The number of permits issued has ranged from 50 to 150 over the same time period and the season dates in 2009 were September 1 – November 27. These harvest levels would be raised by allowing a muzzleloader hunt within the whole FMA.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The current muzzleloader hunt will remain unnecessarily constricted and will continue to result in conflict and poor hunt quality. Harvest numbers in the FMA for antlerless hunts may continue to be lower than management goals.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** N/A.

**WHO IS LIKELY TO BENEFIT?** Anyone interested in hunting antlerless moose by muzzleloader in the FMA.

**WHO IS LIKELY TO SUFFER?** Depending on how the Department decides to allocate antlerless permits in the FMA between bow and arrow and muzzleloader users, it could be possible that the number of permits allocated to bow hunters would go down.

**OTHER SOLUTIONS CONSIDERED?** Consideration was given to modeling the FMA after the Anchorage (DM666) and Palmer-Wasilla Management Areas (DM 403, 406-7, & 410): there, the antlerless permits are available to any certified bow and arrow, shotgun, or muzzleloader hunter. I considered that the antlerless FMA permits could be 113 (2010-2011 number) permits for either bow and arrow or muzzleloader hunters.

**PROPOSED BY:** Valerie Baxter

**LOG NUMBER:** I-10S-G-033

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**PROPOSAL 55 - 5 AAC 92.510 (17) and (18) Areas closed to hunting; and 92.550 (7) and (8) Areas closed to trapping.** Expand the Stampede Closed Areas in Unit 20A and 20C as follows:

Add to the Stampede Closed Area all lands in the Wolf Townships east of the Savage River and west of the Nenana River bounded on the south by Denali National Park and on the north by Denali Park and a line extending from the park boundary east to the Nenana River at approximately 63 degrees 54.6 minutes N. latitude (map is attached).

Declare these areas “closed to the taking of wolves” by either trapping or hunting. It is advisable to close them to the trapping of coyotes as well, to avoid accidental trapping of wolves.

**ISSUE:** Two areas closed to the taking of wolves adjacent to Denali National Park, the Stampede Closed Area and the Nenana Canyon Closed Area will expire in 2010. The Board of Game closed these areas in 2004, recognizing their importance as extended habitat for wolves whose home territories were located in Denali National Park. The need to protect wolves as they venture outside Denali National Park remains and has reached critical proportions, particularly in the area of state lands enclosed on three sides by Denali National Park known as the Stampede or Wolf townships.

Telemetry of collared Denali wolves has shown unequivocally that wolves whose home territories exist as far west as the McKinley River and Birch Creek venture into the Stampede (Wolf) townships during winter, where high winds blow off the snow cover and attract caribou. This places a number of different wolf packs at risk as they venture into more populated areas outside the park. State lands located east of the Savage River are an integral part of this extended range of Denali Park wolf packs, and are outside the existing Stampede Closed Area. Radio locations and personal observations have shown that Denali Park wolves have a distinct preference for the ridges and valleys of this eastern area, and inclusion of this area in any future closure is necessary to provide adequate protection.

The opportunity to view Denali Park wolves in summer draws visitors from all over the world, making the continued integrity of these wolf families important to the economy of the region.

Denali wolves are also important as subjects of research and scientific inquiry. There are few places left in the world to study or view wolves in their natural habitat. The present taking of important park wolves right over the boundary on state lands in the eastern Wolf townships compromises the scientific, economic and aesthetic value of an important Alaskan resource. In recent years, wolves have been seen by visitors on the park road with snares dangling from their swollen necks.

In addition, data show recent decreases in the census of Denali Park wolves, with the current population at approximately 65 individuals, down from 116 in 2006. Although natural mortality is still highly important, the role of human take in this equation is increasing. Prudence would suggest continued and enhanced protection for this population.

The Nenana Canyon closed area is important not only to provide protection for nearby Denali wolf packs but also to provide relief to local residents with public safety concerns due to wolf hunting and trapping within their home and business communities.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Telemetry shows that wolves venture close to the Parks Highway and Nenana Canyon, along the ridges and valleys near Dry Creek and Otto Lake. Local roads and the highway provide access for trappers from miles away who can take advantage off the winter abundance of wolves from deep inside the park. This combination of preferred habitat and relatively easy access will continue to contribute to increased declines in a population already at a low point. A resource of importance to thousands of Alaskans and visitors to the state could be lost or compromised.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Although some say that there is no threat, in general to wolf populations in the park, the maintenance of key family structures and pack traits can be destroyed when several senior members of a wolf pack are lost. Limiting the human take of Denali wolves outside the park will reduce this loss and promote the biological and behavioral integrity of individual wolf families, enhancing their value as research subjects. In addition, maintenance of intact wolf populations within Denali could help prevent the in-migration of lice-infested wolves from other parts of the state.

**WHO IS LIKELY TO BENEFIT?** Those for whom maintaining the integrity of Denali's wolves is important and those whose livelihoods depend on Denali tourism will benefit. The thousands of tourists who visit the park yearly stand to benefit from the maintenance of healthy and natural wolf packs in Denali National Park. We also see it as beneficial when the Department of Fish and Game (department) can promote policies that support the management priorities of the Park Service, when their lands abut and share a common ecosystem.

**WHO IS LIKELY TO SUFFER?** The few trappers who have run trap lines inside the proposal boundaries could continue to trap, but would be unable to trap wolves within those boundaries. There is no subsistence take within the boundaries of the proposed closure.

**OTHER SOLUTIONS CONSIDERED?** This expansion is really the minimum necessary to protect Denali Park wolves, which have special vulnerability throughout the Stampede (Wolf) townships in winter. We had considered promoting an area expansion only as far as the Parks

Highway, but it creates potential for confusion when the Nenana Canyon Closed area meets the expanded Stampede Closed Area. Other solutions not involving closures could include regulations that reduce trapping take from “no limits” to some limited number of wolves to be taken, and hunting regulations that reduce or eliminate the five wolf limit. Reduction in season lengths could be used to attempt to accomplish a reduction in the take of wolves. These interventions, however, are difficult to enforce in the field and are less predictably effective in achieving the goal. A strict closure is better for everyone. The Department could consider declaring the Stampede (Wolf) townships a critical habitat area in recognition of their value for park wolves and other wildlife. Although it does not address the current need to protect wolves, this is an appropriate longer term designation for the area.

**PROPOSED BY:** Denali Citizens Council

(SC-10S-G-008)

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**PROPOSAL 56 - 5 AAC 92.510 Areas closed to hunting; and 5 AAC 92.550 Area closed to trapping.** Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C as follows:

There would be no new regulation. There would be no expansions. Both of these "buffer zones" or "closed areas" would be eliminated totally. Furthermore there would be a sunset clause that would not allow any action on this issue until the year 2020, or if there was a biological reason or emergency. As always the Board of Game could use an emergency closure if they deemed necessary. If there was a biological reason or emergency, the Middle Nenana River Advisory Committee would be at the forefront of closing wolf hunting and trapping until things got better.

**ISSUE:** The Middle Nenana River AC would like the Board of Game (BOG) to eliminate the "Stampede Closed Area" and the "Nenana Canyon Closed Area", also known as the wolf buffer zone.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** This is an unwarranted restriction, or closure, on hunting and trapping wolves in these areas. These closures are not biological sound, do not affect the view ability of the wolves in Denali National Park (the Park) with or without the buffer zones, do not affect the big money going to the companies providing wildlife viewing in the Park with or without the buffer zones, and will not affect the local community with or without the buffer zone.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** It does not improve the quality, but it allows for hunting and trapping on state lands adjacent to the Park. There are quite a few more wolves that use this area than the occasional foray by Park wolves onto state land.

**WHO IS LIKELY TO BENEFIT?** Alaskan hunters and trappers.

**WHO IS LIKELY TO SUFFER?** Maybe a few wolves, but we do not believe this will bring any biological concern, will not affect the view ability of the wolves in the Park, will not affect

the big money going to the companies providing wildlife viewing opportunities, and it will not affect the local economy. With or without the buffer zones, these things will not be affected.

**OTHER SOLUTIONS CONSIDERED?** A) Leaving things status quo but was rejected for the above mentioned reasons. Also, past understandings with other organizations were not adhered to. B) Just closing the Nenana Canyon Closed Area. We rejected this because neither of these areas are necessary.

**PROPOSED BY:** Middle Nenana Advisory Committee

**LOG NUMBER:** I-10S-G-021

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**PROPOSAL 57 - 5 AAC 92.510 Areas closed to hunting; and 92.550 Area closed to trapping.**  
Eliminate the Nenana Canyon Closed Area in Units 20A and 20C as follows:

Remove:

(18). Nenana Canyon Closed Area - Units 20A and 20C: those portions bounded by a line beginning at the intersection of the Unit 20A and 13E boundary and a point exactly one mile east of the George Parks Highway, then southwest along the Unit 20A and 13E boundary to the boundary of Denali National Park and Preserve, then north along the boundary of Denali National Park and Preserve to its intersection with the west bank of the Nenana River at Moody Bridge(MP242.9), then across the Moody Bridge to the unit 20A boundary then north along the boundary of unit 20A to a point exactly one mile east of the George Parks Highway, then south on a line paralleling the George Parks Highway at a distance of one mile, to the point of beginning is closed to taking of wolves.

**ISSUE:** Remove the Nenana Canyon Closed Area and allow wolves to be hunted and trapped.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unit 20C will continue to be managed at low densities. One third of this Unit is Denali National Park, which supports two large populations of predators that are protected from harvest. The area certainly is capable of sustaining larger moose populations; all that is required is controlling predators.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, Unit 20C has too many predators. Studies show that the limiting factor for moose population in this area is too lightly harvested predator population. The wolves will still have Denali National Park for protection. Once the animals leave the boundaries of the park they should be eligible for harvest.

**WHO IS LIKELY TO BENEFIT?** All users of Unit 20C will benefit from high population of moose. Users of other areas who need a better hunting area.

**WHO IS LIKELY TO SUFFER?** People who wish to watch these wolves may have fewer animals to watch.

**OTHER SOLUTIONS CONSIDERED?** No other solution considered.

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-024

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**PROPOSAL 58 - 5 AAC 92.550 (7) and (8) areas closed to trapping; and 92.510 Areas closed to hunting.** Expand the wolf closure areas in Unit 20 as follows:

Expand the current wolf protection area – the no-take “buffer” closed to trapping and hunting of wolves – to encompass a greater portion of the traditional ecological range of Denali National Park wolves.

Specifically, add language to 5 AAC 92.550 (7) and (8) that meets the intent of the following:

- Keep the existing no-take buffer (“Stampede Closed Area”), and expand its boundaries as follows: Commencing at the far northeast corner of Denali National Park and Preserve (at approximately 64.00.00 N, 148.53.00 W) in Unit 20A, thence southeastward along a straight line to the top of Dora Peak (at approximately 63.49.20 N, 148.41.00 W), thence southeastward along a straight line to the top of Pyramid Mountain (at approximately 63.38.40 N, 148.31.00 W), thence due south until intersecting Bruskasna Creek (at approximately 63.27.00 N, 148.31.00 W), thence westward (downstream) along Bruskasna Creek to its confluence with the Nenana River (approximately 63.26.10 N, 148.37.80W) thence westward (downstream) along the north side of the Nenana River to its confluence with Windy Creek at the east park boundary (at approximately 63.27.90 N, 148.49.00 W).
- The no-take buffer expansion must also prohibit take (hunting and trapping) of coyotes as well, as some of the wolves taken in this area appear to be taken in coyote snares / traps or for other reasons related to mistaking wolves for coyotes. Thus, the proposal calls for trap size and types to be restricted in order to minimize or eliminate the “non-target” take of wolves in the buffer zone as follows: Traps and snares that could lethally take or injure wolves, including young wolves, are prohibited from use in the buffer zone; a person using traps or snares in the buffer zone must register with the Department of Natural Resources Denali State Park area office to receive an orientation regarding avoiding wolves and provide a trapper identification; all traps and snares in the area must be marked with the selected identification.

**ISSUE:** Wolves that are protected within the Denali National Park range onto state lands along the eastern boundary of the Park and are taken by recreational hunters / trappers. Denali wolves are a high-value economic, ecological, and scientific resource for Alaska, and the current recreational trapping / hunting take along the northeast boundary of the park is having a significant deleterious impact on these resource values. The existing wolf protection “buffer” on state lands closed to the taking of wolves is necessary, but as the existing closed area does not cover a significant part of their winter range, the existing buffer does not sufficiently protect Denali wolves.

Areas to the east of the current buffer are important wintering area for ungulates, particularly caribou. Established groups of wolves are thus attracted to the area for varying winter intervals, and

a few recreational trappers / hunters target them accordingly. These groups of wolves come from adjacent areas of the park, but also from as far as 60-70 miles or more away, most notably in the Wonder Lake area and beyond. Further, the Toklat and Margaret groups also take “extraterritorial forays” east of the Nenana River, where they are exposed to lethal take by trapping and hunting. The eastern park boundary area is integral to the park ecosystem, but the present park and buffer zone boundaries are not consistent with appropriate ecological boundaries. In short, current state management does not adequately protect Denali wolves.

In some years, as many as 18 – 19 wolves from the five radio-collared Denali study groups – including the famous Toklat / East Fork family – were snared, trapped, and shot in the area adjacent to the existing buffer, beginning in late October. Since 2003, when the present state buffer zone areas were finalized, at least seven of the nine radio collared Denali study groups known to have spent time in that area suffered trapping and shooting losses while there. Since 1987, when wolves were first radio-collared in Denali, 19-20 collared wolves (among others without collars) from 11 – 12 Denali study groups have been snared, trapped or shot in the northeast boundary area. The 11 – 12 groups included 3-4 groups from areas west and northwest of Wonder Lake, seven from areas within and adjacent to the state area, and one from an area between. Occasionally, wolves with snares from the Stampede area around their neck or paws are seen in the Park.

The Denali wolves are highly valued by Alaskans and around the world for ecological, scientific, viewing, economic, and other reasons. Their economic value alone to Alaskans is enormous, because of Denali’s importance as the state’s top tourism attraction and the importance of wolves as one of the park’s top attractions. Denali is one of the only places in the world where tourists have a reasonable chance to see wolves in the wild. But the aforementioned losses, which included key wolves of the most visitor-accessible groups (e.g., alpha male of the Margaret family in 2004, alpha female of the Toklat family in 2005), have translated into significant deleterious impacts to all of these values.

The trapping / hunting of wolves on state lands along the park boundary are conducted primarily by 3 or 4 recreational users who have other sources of income. This is not a subsistence take. Recreational trapping / hunting along the boundary of a national park also raises significant ethical take issues. There can be little justification for prioritizing the recreational benefit to a few individuals over the economic, recreational, and scientific benefit to hundreds of thousands of Alaska and U.S. citizens, as well as tourists from around the world, that would derive from additional protection of Denali wolves as proposed here.

The state has a Memorandum of Understanding to work cooperatively with the federal government on wildlife management in Alaska. The mandates of the Denali National Park management plan included the maintenance of the natural abundance and diversity of wolf populations in the park. Current non-essential harvest on state lands along the boundary is causing significant negative impacts to the integrity of Denali National Park wolf groups, and the Alaska Board of Game has an obligation to adapt management on adjacent state lands accordingly.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The significant economic, scientific, and ecological value of these Denali wolf family groups (packs) will continue to be degraded and/or

lost. The growth potential for tourism based on wolf viewing at Denali, and the unique opportunity for science will not be fully utilized.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** The several hundred thousand visitors to Denali National Park will benefit from increased wolf viewing success, thus enhancing the tourism economy at Denali and the state. Scientifically, the long-studied Denali wolves will suffer far fewer trapping / hunting losses, and thus provide opportunity to study long-term population and social dynamics of unexploited wolf family groups (packs). The solution proposed here would establish the only protected wolf family groups anywhere in Alaska, thus providing unique scientific opportunities.

**WHO IS LIKELY TO SUFFER?** There are only three or four primary recreational wolf trappers who would be impacted by the proposal, and as these individuals have other accessible areas to replace the area that would be closed to take by this proposal, the impact would be negligible.

**OTHER SOLUTIONS CONSIDERED?** Another solution being considered to provide additional protection to Denali wolves is to have the National Park Service acquire or trade for the state lands in question along the NE boundary of the Park, and place them under federal management as part of Denali National Park. This would be controversial among local landowners (including the state, borough, and others). Another solution in consideration is to attach conditions to the transfer of federal Pittman-Robertson funds to the Department of Fish and Game (about \$14 million this year) that would require the state to provide reasonable protections to wildlife that range across boundaries of federally protected areas onto state lands. This too would be controversial in the Department and local consumptive user groups. Thus, the expanded no-take buffer at Denali is the most reasonable action for immediate board consideration.

**PROPOSED BY:** Anchorage Fish & Game Advisory Committee

**LOG NUMBER:** (SC-10S-G-004)

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**PROPOSAL 59 - 5 AAC 92.510 areas closed to hunting and 92.550 areas closed to trapping.**

Expand the Nenana Canyon closed area IN Units 20A and 20C as follows:

The existing Nenana Canyon buffer would be expanded such that the west boundary would be the east boundary of the Park; the buffer's east boundary would be exactly one mile east of and parallel to the Anchorage-Fairbanks Intertie Electrical Power Line; the south boundary would be Carlo Creek; the north boundary would be a line due east from the east boundary of the Park through the town of Healy, to one mile east of the Intertie Line. Taking of wolves (hunting and trapping) within this buffer would be prohibited.

**ISSUE:** The existing Nenana Canyon "buffer" east of the northeast boundary of Denali National Park was designed to protect the Park's wolves from hunting and trapping but is grossly inadequate. The buffer is far too small to protect Park wolves that range outside the Park's boundaries. In recent

years wolf packs have been severely reduced or eliminated by trapping and shooting when wolves that live primarily within the Park most of the year move east into the Parks Highway Corridor and beyond. As a result, viewing opportunities are reduced for thousands of visitors that come to the Park to see wildlife. In addition, scientific studies conducted since the 1930s of wolves and predator-prey relationships have been negatively impacted.

Justification: It has long been known that various wild animal residents of Denali National Park including caribou, moose, wolves, bears, and several other species of furbearers seasonally move east out of the Park to use areas near the Parks Highway and areas farther east including the Yanert River valley. They may be born within the Park and spend most of their lives there, but leave the Park for brief or even extended periods. Thousands of visitors may observe them within the Park where they are not hunted or trapped and thus become habituated to the sights, sounds and smells of humans.

When such animals move onto adjacent lands where hunting and trapping are permitted, they may be killed. Hunting and trapping along the Park's northeast boundary has been going on for decades.

In recent years as scientific studies greatly expanded in the Park, many animals of several different species were radio-collared thereby allowing biologists to accurately determine their movements within the Park as well as migrations outside its boundaries. This confirmed the timing and extent of movements onto adjacent lands and demonstrated, for example, that the Denali Caribou Herd often occupied winter range near the north boundary. It also confirmed that Park wolves from several different packs followed the caribou out of the Park. Radio-collared wolves also provided the opportunity to document that Park wolves were at times shot and trapped in adjacent areas outside the Park.

In the 1980s, biologists and others concerned with the Park's ecological integrity raised concerns about the impacts of hunting and trapping of wolves along the northeast boundary and presented various options designed to reduce these impacts. State officials were reluctant to change the hunting and trapping regulations to accommodate these concerns and wolves continued to be shot and trapped. But in November 1992, the State Board of Game established a large (600 square mile) buffer east of the Park to reduce the potential negative impact on the Park's wolves of a large-scale wolf control program the board planned to implement in areas farther east. Two months later the board rescinded the buffer when negative public reaction to the control program prevented its adoption.

During the 1990s as additional wolves were taken adjacent to the Park, concerns increased and the board received public comments about the continued need for buffers. In November 2000, the board established a small buffer containing only 29 square miles along the Stampede Trail. This was grossly inadequate to provide sufficient protection and in May 2001 it was expanded to include about 90 square miles west of the Savage River. However, wolves moving east of the Park's boundary were still subject to hunting and trapping losses and one pack was eliminated after the alpha female was killed in a snare left out after the close of trapping season. Subsequently, other wolves from the Park's easternmost pack were trapped east of the Park boundary.

In October 2002 the board received written comments and heard extensive testimony supporting and opposing establishing a second buffer east of the northeast corner of the Park. A citizens advisory committee appointed by the board recommended a large buffer. A proposals to the board containing these boundaries was amended several times; each amendment reduced the size of the buffer considerably. The board adopted the final version providing a very small buffer that few thought would effectively protect the Park's wolves.

In March 2004, the board further reduced the size of the buffer to its present configuration.

Now, National Park Service data on radio-collared wolves living mostly within the Park but shot or trapped on adjacent lands allows assessment of the efficacy of the buffers.

During 1986-1997 (11 years) prior to establishment of the buffer, 14 radio-collared wolves were taken on state land near the Park's northern boundary. During 2003-2009 (6 years) after the buffer was established, 18 wolves were taken. Additional Park wolves not radio collared were also taken but their numbers are unknown.

For all radio-collared wolves in the Park, from 1986 to 2002, humans caused 17 percent of all mortality. From 2003 to 2009, that increased to 30 percent.

From 1985 to 2009 there has been an increasing trend in the number of wolves harvested in this area (including Park wolves) as determined by the State's pelt sealing data. During this 24-year interval, the highest harvest (12) occurred in 2007, far higher than harvests typical of the earlier years (0-6).

Clearly, substantial numbers of Park wolves continue to be taken outside the Park despite the buffer west of the Savage River and east of the northeast Park boundary. Accordingly, the eastern buffer should be expanded to provide adequate protection for wolves that move out of the Park into the Parks Highway Corridor and beyond.

Past opponents of establishing or expanding buffers to protect Park wolves have argued that hunting and trapping losses outside the Park do not significantly affect the dynamics of the Park's wolf population which often fluctuates, around 100 wolves. We concur. However, that is not the issue. We are primarily concerned with protecting three wolf packs (Grant Creek, East Fork (Toklat), and a third pack variously known over the years as Savage, Headquarters, Sanctuary, Jenny Creek, and Mount Margaret) that are most commonly viewed by Park visitors. Radio-tracking data indicate that all but the Grant Creek Pack are known to occasionally move east into the Parks Highway Corridor and beyond. These are the packs that historically have suffered the highest losses and severe impacts due to hunting and trapping, including elimination of packs. We contend that the resulting negative effects on viewing opportunities and scientific studies have been and may continue to be excessive and could be reduced greatly by expanding the Nenana Canyon buffer.

Denali National Park is one of the few places in North America where sub-arctic wolves can consistently be viewed. The 90-mile long Park road provides access. Several wolf packs occupy territories along the road. Expansive tundra areas allow for a high probability of sightings.

Wolves are protected from hunting and trapping and habituate to vehicles and humans. The net result is that thousands of visitors riding buses in the Park see wolves about 19 percent of the time, a very high rate compared to many other areas. The Alaska Visitor Statistics Program reports that Denali is the most popular tourist destination in Alaska with more than 400,000 visitors in 2008. The resulting economic contribution to the state is large.

Alaska's residents can also see and hear wolves any time the Park's road is open. The first 15 miles are paved and can be driven without a permit. The wolf pack in this area has frequently been seen near or on the road over the years, and is often heard howling. We note that virtually all the other drivable roads in Alaska provide virtually no wolf viewing opportunities due to hunting and trapping effects. These include the Denali Highway, a 135 mile gravel road east of the Park. It passes through similar terrain to the Park's but is heavily hunted and trapped and very few wolves survive. Those that do flee at the first sight, sound or smell of humans.

We contend that the wolves of Denali are worth far more to Alaska's residents and nonresident visitors as animals to be viewed and heard rather than shot or trapped by a small number of hunters and trappers. We also contend that the scientific studies of Denali's wolves that started in 1939 and continue today are of world-wide significance and deserve protection. These studies provide an invaluable contrast to studies done outside the Park where humans influence predators, prey, and habitats. Results of those studies can only be interpreted through comparisons with data from places like Denali where animal populations and habitats are naturally regulated and largely free of human effects. We suggest that it is good public policy for the Board of Game to recognize these claims as valid, to allocate the small number of wolves taken near the northeast boundary to wildlife viewing and research rather than hunting and trapping, and to expand the existing buffer to minimize further losses of Park wolves.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Wolves will continue to be trapped and shot as they move across the Park's boundaries onto adjacent lands. Losses due to hunting and trapping have severely reduced or eliminated certain wolf packs in recent years and this may continue. Thousands of park visitors, Alaska residents and nonresidents alike, will be deprived of seeing wolves in the Park. Wolves may also continue to be caught in snares and they may continue to break the cables but retain the snare loops around their necks. Wolves with festering wounds with broken snare cables will continue to be observed in the Park with very negative public perceptions regarding trapping. Long-term scientific studies in Denali National Park of wolf biology, ecology and predator-prey relationships will continue to be disrupted as hunting and trapping losses have severe impacts on wolf pack continuity, territory relationships and long-term impacts of wolf predation on moose, caribou and Dall sheep.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** Many hundreds of thousands, perhaps millions, of visitors to Alaska over the years who would have improved odds of seeing a wild, sub-arctic wolf. Many thousands of Alaska residents who have very limited opportunities to see and hear wild wolves anywhere else along the road system except Denali. Biologists who conduct studies on Denali's wolves and related species whose studies would be protected from severe impacts due to hunting

and trapping losses of wolves. The Board of Game would benefit by being perceived as supporting viewing of wildlife as an important and valid use of Alaska's wildlife, in addition to consumptive uses.

**WHO IS LIKELY TO SUFFER?** A very small number (less than 5) of hunters and trappers who would lose harvest opportunities.

**OTHER SOLUTIONS CONSIDERED?** Expanding the buffer far to the east to include the boundaries of the original 600 square mile buffer adopted in 1992 by the board. This would provide an unnecessary closure during most years when wolves do not make movements far to the east. We acknowledge that we cannot reduce to zero the risk of having Park wolves shot or trapped. We think that our recommended expansion of the buffer, while not completely effective, is the best possible option for a complex management problem.

**PROPOSED BY:** Defenders of Wildlife

**LOG NUMBER:** (SC-10S-G-006)

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**PROPOSAL 60 - 5 AAC 92.510 Areas closed to hunting and 5 AAC 92.550 Area closed to trapping.** Expand the Stampede Trail Closed Area in Units 20C as follows:

The existing Stampede Trail Buffer (West of the Savage River) would be expanded eastward to the Parks Highway so as to prohibit the taking (hunting and trapping) of wolves in the entire block of land commonly known as the "Wolf Townships".

**ISSUE:** The existing "buffer" west of the Savage River adjacent to the north boundary of Denali National Park was designed to protect the Park's wolves from hunting and trapping but is grossly inadequate. The buffer is far too small to protect Park wolves that range outside the Park's boundaries. In recent years there has been an increasing number of Park wolves shot or trapped on lands east of the Savage River. Wolf packs living primarily within the Park during most of the year have been severely reduced in size thereby reducing viewing opportunities for thousands of Park visitors. In addition, scientific studies conducted since the 1930s of wolves and predator-prey relationships have been negatively impacted.

Justification: It has long been known that various wild animal residents of Denali National Park including caribou, moose, wolves, bears, and several other species of furbearers annually migrate out of the Park to occupy seasonally ranges to the north. They may be born within the Park and spend most of their lives there, but leave the Park for brief or even extended periods. Thousands of visitors may observe them within the Park where they are not hunted or trapped and thus become habituated to the sights, sounds and smells of humans.

When such animals move onto adjacent lands where hunting and trapping are permitted, they may be killed. Hunting and trapping along the north boundary has been going on for decades. For example, Frank Glaser, as well-known predator control agent, had a trap line in this area in

the 1930s and 1940s and trapped or shot many wolves, foxes, bears, caribou and moose, some of which migrated out of the Park.

In recent years as scientific studies greatly expanded in the Park, many animals of several different species were radio-collared thereby allowing biologists to accurately determine their movements within the Park as well as migrations outside its boundaries. This confirmed the timing and extent of movements onto adjacent lands and demonstrated, for example, that the Denali Caribou Herd often occupied winter range near the north boundary. It also confirmed that Park wolves from several different packs followed the caribou out of the Park. Radio-collared wolves also provided the opportunity to document that Park wolves were at times shot and trapped in adjacent areas outside the Park.

In the 1980s, biologists and others concerned with the Park's ecological integrity raised concerns about the impacts of hunting and trapping of wolves along the north boundary and presented various options designed to reduce these impacts. State officials were reluctant to change the hunting and trapping regulations to accommodate these concerns and wolves continued to be shot and trapped. But in November 1992, the State Board of Game established a large (600 square mile) buffer east of the Park to reduce the potential negative impact on the Park's wolves of a large-scale wolf control program the board planned to implement in areas farther east. Two months later the board rescinded the buffer when negative public reaction to the control program prevented its adoption.

During the 1990s as additional wolves were taken adjacent to the Park, concerns increased and the board received public comments about the continued need for buffers. In November 2000, the board established a small buffer containing only 29 square miles along the Stampede Trail. This was grossly inadequate to provide sufficient protection and in May 2001 it was expanded to include about 90 square miles west of the Savage River.

Now, eight years later, National Park Service data on radio-collared wolves living mostly within the Park but shot or trapped on adjacent lands allows assessment of the efficacy of the buffer.

During 1986-1997 (11 years) prior to establishment of the buffer, 14 radio-collared wolves were taken on state land near the Park's northern boundary. During 2003-2009 (6 years) after the buffer was established, 18 wolves were taken. Additional Park wolves not radioed were also taken but their numbers are unknown.

For all radio-collared wolves in the Park, from 1986 to 2002, humans caused 17 percent of all mortality. From 2003 to 2009, that increased to 30 percent. From 1985 to 2009 there has been an increasing trend in the number of wolves harvested in this area (including Park wolves) as determined by the State's pelt sealing data. During this 24-year interval, the highest harvest (12) occurred in 2007, far higher than harvests typical of the earlier years (0-6).

Clearly, substantial numbers of Park wolves continue to be taken outside the Park despite the buffer west of the Savage River. Accordingly, the buffer should be expanded to provide adequate protection for wolves that move out of the Park east of the Savage River.

Past opponents of establishing or expanding buffers to protect Park wolves have argued that hunting and trapping losses outside the Park do not significantly affect the dynamics of the Park's wolf population which often fluctuates, around 100 wolves. We concur. However, that is not the issue. We are primarily concerned with protecting three wolf packs (Grant Creek, East Fork (Toklat), and a third pack variously known over the years as Savage, Headquarters, Sanctuary, Jenny Creek, and Margaret) that are most commonly viewed by Park visitors. These are the packs that historically have suffered the highest losses and severe impacts due to hunting and trapping, including elimination of packs. We contend that the resulting negative effects on viewing opportunities and scientific studies have been and may continue to be excessive and could be reduced greatly by expanding the Stampede Trail buffer.

Denali National Park is one of the few places in North America where sub-arctic wolves can consistently be viewed. The 90-mile long Park road provides access. Several wolf packs occupy territories along the road. Expansive tundra areas allow for a high probability of sightings. Wolves are protected from hunting and trapping and habituate to vehicles and humans. The net result is that thousands of visitors riding buses in the Park see wolves about 19 percent of the time, a very high rate compared to many other areas. The Alaska Visitor Statistics Program reports that Denali is the most popular tourist destination in Alaska with more than 400,000 visitors in 2008. The resulting economic contribution to the state is large.

Alaska's residents can also see and hear wolves any time the Park's road is open. The first 15 miles are paved and can be driven without a permit. The wolf pack in this area has frequently been seen near or on the road over the years, and is often heard howling. We note that virtually all the other drivable roads in Alaska provide virtually no wolf viewing opportunities due to hunting and trapping effects. These include the Denali Highway, a 135 mile gravel road east of the Park. It passes through similar terrain to the Park's but is heavily hunted and trapped and very few wolves survive. Those that do flee at the first sight, sound or smell of humans.

We contend that the wolves of Denali are worth far more to Alaska's residents and nonresident visitors as animals to be viewed and heard rather than shot or trapped by a small number of hunters and trappers. We also contend that the scientific studies of Denali's wolves that started in 1939 and continue today are of world-wide significance and deserve protection. These studies provide an invaluable contrast to studies done outside the Park where humans influence predators, prey, and habitats. Results of those studies can only be interpreted through comparisons with data from places like Denali where animal populations and habitats are naturally regulated and largely free of human effects. We suggest that it is good public policy for the Board of Game to recognize these claims as valid, to allocate the small number of wolves taken near the north boundary to wildlife viewing and research rather than hunting and trapping, and to expand the existing buffer to minimize further losses of Park wolves.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Wolves will continue to be trapped and shot as they move across the Park's boundaries onto adjacent lands. Losses due to hunting and trapping have severely reduced or eliminated certain wolf packs in recent years and this may continue. Thousands of park visitors, Alaska residents and nonresidents alike, will be deprived of seeing wolves in the Park. Wolves may also continue to be caught in snares and they may continue to break the cables but retain the snare loops around their necks. Wolves with festering wounds with

broken snare cables will continue to be observed in the Park with very negative public perceptions regarding trapping. Long-term scientific studies in Denali National Park of wolf biology, ecology and predator-prey relationships will continue to be disrupted as hunting and trapping losses have severe impacts on wolf pack continuity, territory relationships and long-term impacts of wolf predation on moose, caribou and Dall sheep.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? N/A**

**WHO IS LIKELY TO BENEFIT?** Many hundreds of thousands, perhaps millions, of visitors to Alaska over the years who would have improved odds of seeing a wild, sub-arctic wolf. Many thousands of Alaska residents who have very limited opportunities to see and hear wild wolves anywhere else along the road system except Denali. Biologists who conduct studies on Denali's wolves and related species whose studies would be protected from severe impacts due to hunting and trapping losses of wolves. The Board of Game would benefit by being perceived as supporting viewing of wildlife as an important and valid use of Alaska' wildlife, in addition to consumptive uses.

**WHO IS LIKELY TO SUFFER?** A very small number (less than 5) of hunters and trappers who would lose harvest opportunities.

**OTHER SOLUTIONS CONSIDERED?** Expanding the buffer far to the east to include areas visited occasionally by Park wolves during the extra-territorial movements. This would provide an unnecessary closure during most years when wolves do not make such movements. We acknowledge that we cannot reduce to zero the risk of having Park wolves shot or trapped. We think that our recommended expansion of the buffer, while not completely effective, is the best possible option for a complex management problem.

**PROPOSED BY:** Defenders of Wildlife

**LOG NUMBER:** (SC-10S-G-005)

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**PROPOSAL 61 - 5 AAC 92.510. Areas closed to hunting.** Eliminate the Stampede Closed Area in Unit 20C as follows:

Remove:

(17) Stampede Closed Area - Unit 20C, west of Savage River bounded by Denali National Park is closed to the taking of wolves.

**ISSUE:** Remove the stampede closed area, and allow wolves to be hunted and trapped.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unit 20C will continue to be managed at low densities. One third of this unit is Denali National Park, which supports two large populations of predators that are protected from harvest. The area certainly is capable of sustaining larger moose populations; all that is required is controlling predators.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, Unit 20C has too many predators. Studies show that the limiting factor for moose populations in this area are too lightly harvested predator populations. The wolves will still have Denali National Park for protection. Once the animals leave the boundaries of the park they should be eligible for harvest.

**WHO IS LIKELY TO BENEFIT?** All users of Unit 20C will benefit from high population of moose. Users of other areas who need a better hunting area.

**WHO IS LIKELY TO SUFFER?** People who wish to watch these wolves may have fewer animals to watch.

**OTHER SOLUTIONS CONSIDERED?** No other solutions considered.

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-025

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**PROPOSAL 62 - 5 AAC 92.110. Control of predation by wolves; 5 AAC 92.125. Predation Control Implementation Plans.** Establish a wolf predation control area implementation plan for Unit 20C as follows:

Adopt a wolf population reduction or a wolf population regulation program in accordance with 5 AAC 92.110.

- Remove wolf buffer zones from Unit 20C.
- Liberalize methods and means regulation for taking wolves from moving snow machines and possible aerial management of wolves.
- Set a reasonable time for the management of the wolf population program, which ensure recovery of the moose population.
- Other regulations as the board determines necessary to achieve a successful recovery of the moose population.

**ISSUE:** In Unit 20C establish a wolf population reduction program in accordance with in accordance with 5 AAC 92.110. In twenty years Unit 20C has not met the harvest objectives for moose in accordance with 5 AAC 92.108 Identified Big Game prey populations and objectives. Unit 20C also has not met the population objectives by half in this same time period (of course this is based on estimates and extrapolations, as there are no surveys conducted in this area).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unit 20C will continue to be managed at low densities, and the intent of AS 16.05.255 will not be met (i.e. restore the abundance or productivity of identified big game prey populations). The area certainly is capable of sustaining larger moose populations; all that is required is controlling predators.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS**

**PRODUCED BE IMPROVED?** Harvest objectives have not been met in 20 years and the Department has developed studies that determined the limiting factor of moose reaching their population objectives is lightly harvested bear and wolf populations. The board taking steps to manage predators in this unit will allow the moose population to be maintained at near maximum sustainable yield population levels in accordance with 5 AAC 92.106.

**WHO IS LIKELY TO BENEFIT?** All users of Unit 20C will benefit from high populations of moose. Users of other areas who need a better hunting area. The land owners who have private remote recreational/homestead properties in this unit.

**WHO IS LIKELY TO SUFFER?** Many non-consumptive users will not be happy with the active reduction of wolves in this area. Denali National Park makes up about 1/3 of this unit and additional closed hunting areas have been established outside of the park to satisfy this contingency ensures that a health wolf population is protected. Consider however, that this moose population has been identified as a big game prey population that is important for providing high levels of human consumptive use in accordance with 5 AAC 92.106 and 92.108.

**OTHER SOLUTIONS CONSIDERED?** No other solutions considered.

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-032

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**PROPOSAL 63 - 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.** Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C as follows:

Don't keep the Stampede and Nenana Canyon Closed Areas on the books.

**ISSUE:** State restricted area number 17 and 18 are closed to taking wolves for reasons other than conservation. Data collected by the NPS show very little use of these areas by packs of wolves who normally live in Denali National Park. Harvest data from the Department show that a few wolves are harvested by hunters and trappers in areas adjacent to these "restricted areas" and adjacent to the park boundary. There has never been a correlation between the number of wolf "viewing" opportunities on the park road and the harvest of wolves outside the park boundary. Protected wolves near people are habituated to areas and actions that are not desirable for wild animals. There is no reason for any hunter or trapper to be restricted from harvest outside the park boundary.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Other areas set aside for viewing have the issue of conflict of use that influenced the decision to "restrict" harvest. (McNiel River, Pack Creek, Sheep Mountains, etc.). There is no conflict in these restricted areas. Although small, local hunters and trappers have used the closed areas in the past and should be allowed to return.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. There is no "loss" of product or harvest for the viewing uses of wolves in the park if the restrictions outside the park boundary are removed. The additional harvest improves the quality for local hunters and trappers.

**WHO IS LIKELY TO BENEFIT?** Hunters and trappers using the areas just outside the park boundary.

**WHO IS LIKELY TO SUFFER?** Those who want to believe there is a correlation between the viewing and harvest outside the park will continue to support the emotional aspects of the issue.

**OTHER SOLUTIONS CONSIDERED?** Another options is to recommend the board "take no action" on any proposal concerning the restricted areas. I rejected that option because the board will discuss the issue anyway.

**PROPOSED BY:** Mike Tinker

**LOG NUMBER:** I-10S-G-029

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**PROPOSAL 64 - 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.** Open the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C as follows:

Open the Stamped Closed Area and the Nenana Canyon Closed Area in Units 20A and 20C for hunting and trapping of wolves. Get rid of these closed areas/buffer zones.

**ISSUE:** No biological reason for Stampede Closed Area (SCA) and Nenana Canyon Closed Area (NCCA) for hunting and trapping wolves.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Loss of opportunity to harvest renewable resource. Wolf population recovers very quickly.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. Reduces predation on local caribou, sheep, and moose populations.

**WHO IS LIKELY TO BENEFIT?** All consumptive and non-consumptive users of wildlife.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Brent Keith

**LOG NUMBER:** HQ-10S-G-017

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**PROPOSAL 65 - 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.** Prohibit the taking of wolf in a portion of Unit 20C as follows:

Unit 20C; The area west of a line connecting the Moody Bridge (George Parks Highway MP 242.9) with the southeast corner of Township 11S, Range 9W, and bounded by Denali National Park on three sides, is closed to the taking of wolves.

**ISSUE:** Each year, many thousands of visitors see wolves along the Denali Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild. More than anywhere else in Alaska, wolves in the eastern part of Denali provide significant benefits to tourism, wolf viewing opportunities are mostly provided by three packs of wolves that live near the park road. Since 2000, certain areas adjacent to the park boundary have been closed to the taking of wolves in order to protect wolf viewing opportunities in the park. Since 2004, when the stampede closed area was continued and the Nenana canyon closed area was decreased in size, these two closed areas currently total 122 square miles in Unit 20A and Unit 20C closed to the taking of wolves. Analysis of data from the nation Park Service GPS radio collars shows that two of three most commonly viewed wolf packs in the park occasionally travel into areas east of the Stampede closed area where they are vulnerable to harvest. The Department sealing records from UCU 605 and 607 of Unit 20C indicate an upward trend in the number of wolves harvested in this area with as many as 12 wolves taken in 2007. Because wolves that frequent the park road are accustomed to the presence of humans they are particularly vulnerable to harvest and even older breeding wolves are more susceptible to being trapped or shot because of their lack of fear of humans. Harvest of wolves, particularly breeding wolves, has the potential to decrease wolf numbers, alter wolf behavior, and decrease opportunities for wolf viewing by park visitors. This has little effect on larger scale wolf populations but can have significant, year-long, effects on visitor experiences.

Another effect that has been seen in recent years is the presence of wolves with broken snares or traps in areas where they are seen by large numbers of people. In winter 2007-2008, two wolves were photographed wearing broken snares. Another wolf was seen on the park road carrying a trap on its foot from the previous year. Such sightings have a detrimental effect on public opinion of trapping and wildlife management in general. Finally , wolf capture in and near Denali National Park in recent years have shown a high incidence of wolves with lice just north of the park, but no evidence of lice from wolves living deeper within the park boundaries. Protection of park wolf packs from harvest promotes a pattern of movement of dispersing wolves out of the park and not into it, helping to ensure that the park is a reservoir of uninfected wolves.

Analysis of data from NPS GPS radio collars on three wolf packs that frequent the park road shows that a 64% enlargement of the size of the closed area would create area would create a nearly fourfold increase in the level of protection of the two most vulnerable and often-viewed wolf packs in Denali. We propose extending the eastern boundary of the Stampede Closed Area to a diagonal line connecting the two corners of the park south and northwest of Healy (from the Moody Bridge to the southeast corner of Township 11 South, Range 9 West near Eight mile Lake). Based on GPS data on collared wolves over the last 6 years, this boundary would provide

almost complete protection of the wolves living in the Teklanika-Toklat area of the park, and would also encompass 75% of the areas where wolves in the east end of the park venture outside of park boundaries.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Wolves from the most commonly viewed packs will continue to be trapped and hunted just outside of park boundaries, in places as close as four miles from the park road. This will result in continued disruption of wolf packs in the areas where wolves are seen by visitors, sporadic but temporary lowering of wolf numbers along the park road, and decreased opportunities for wolf viewing.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal would help to protect and improve the opportunities for park visitors to see wolves along the Denali Park Road. It would have a small detrimental effect on the number of wolves harvested in a portion of GMU 20C. It would help to protect the quality of the wolf resource by promoting the net movement of wolves out of Denali National Park, helping to provide reservoir of wolves not infected by lice.

**WHO IS LIKELY TO BENEFIT?**

- Park visitors who want to see wolves in the wild (about 400,000 annual visitors).
- Tour operators and the Alaska tourism industry.
- Trappers statewide, because the public will not develop anti-harvest opinions from seeing injured wolves and learning of wolf harvest adjacent to park boundaries.
- Troopers and hunters who wish to minimize the spread of lice among Alaskan wolves.
- People who value the concept of conservation areas for wildlife.

**WHO IS LIKELY TO SUFFER?** Trappers and hunters who wish to harvest wolves in the 77 square mile area that we are proposing to be added to the Stampede Closed Area. Over the last 20 years, the average number of different individual harvesting a wolf from this area is less than 2 people per year. Almost half of the wolves in the area are taken by local residents.

**OTHER SOLUTIONS CONSIDERED?** Extension of the Stampede Closed area east to the eastern boundary of Township 12 S, Range 9W (straight south from the northeast finger of the park). This boundary does not encompass a significant number of locations where park road wolf packs ventured outside of park boundaries.

Extension of the Stampede Closed Area east to the George Park Highway or the Nenana River. These further eastward extensions would have little additional effect in protecting these wolves, based on GPS collar data, and would increase the burden on local trappers and hunters

**PROPOSED BY:** Superintendent, Denali National Park and Preserve

**LOG NUMBER:** HQ-10S-G-031

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**PROPOSAL 66 - 5 AAC 92.110. Control of predation by wolves; and 5 AAC 92.125. Predation Control Areas Implementation Plans.** Establish an intensive management area in Unit 20C as follows:

Unit 20C will be managed as an intensive management area.

**ISSUE:** Low moose densities in subunit 20C due to lightly harvested brown bear and wolf populations. The evidence would seem to support wolves and brown bears are the limiting factor for moose in this subunit 20C.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unit 20C will continue to be managed at low densities. One third of this unit is Denali National Park, which supports two large populations of predators that are protected from harvest. The area certainly is capable of sustaining larger moose population all that is required is controlling predators.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Currently the harvest objectives are set around 130. Managing the area for higher sustained yield would allow for a wide range of outdoor uses of the resource.

**WHO IS LIKELY TO BENEFIT?** All users of Unit 20C will benefit from high populations of moose. Users of other areas who need a better hunting area.

**WHO IS LIKELY TO SUFFER?** I do not believe that anyone will suffer by managing this area at high level.

**OTHER SOLUTIONS CONSIDERED?** No other solutions considered.

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-026

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**PROPOSAL 67 - 5 AAC 92.115. Control of predation by bears; and 5 AAC 92.125. Predation Control Areas Implementation Plans.** Establish a bear predation control area implementation plan for Unit 20C as follows:

Adopt a bear population reduction or a bear population regulation program in accordance with 5 AAC92.110.

- Liberalize methods and means regulation for taking brown bear with the use of bait.
- Lengthen Brown Bear seasons to provide more harvest opportunity.
- Set a reasonable time for the management of the bear population program which ensures recover of the moose population.
- Liberalize the use of aerial equipment to harvest bear in this unit.

Other regulations as the board determines necessary to achieve a success recover of the moose population.

**ISSUE:** In Unit 20C establish a bear population reduction program in accordance with 5 AAC 92.115, in twenty years unit 20C has not met the harvest objectives for moose in accordance with 5 AAC 92.108 identified Big Game prey populations and objectives. Unit 20C also has not met the Population Objectives by half in this same time period (of course this is based on estimates and extrapolations, as there are no surveys conducted in this area).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unit 20C will continue to be managed at low densities, and the intent of AS 16.05.255 will not be met (i.e. restore the abundance or productivity of identified big game prey populations). The area certainly is capable of sustaining larger moose populations; all that is required is controlling predators.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Harvest objectives have not been met in 20 years and the Department has developed studies that determined the limiting factor of moose reaching their population objectives is lightly harvested bear and wolf populations. The board taking steps to manage predators in this unit will allow the moose population to be maintained at near maximum sustainable yield population levels in accordance with 5 AAC 92.106.

**WHO IS LIKELY TO BENEFIT?** All users of Unit 20C will benefit from high populations of moose. Users of other areas who need a better hunting area.

**WHO IS LIKELY TO SUFFER?** Many non-consumption users will not be happy with the active reduction of bear in this area. Denali National Park (where no hunting is allowed) makes up about one third of this unit; additionally one third is the best brown bear habitat which also has the highest brown bear densities in the unit. Consider however, that this moose population has been identified as a big game prey population that is important for providing high levels of human consumption use in accordance with 5 AAC 92.106 and 92.108.

**OTHER SOLUTIONS CONSIDERED?** No other solutions considered.

**PROPOSED BY:** Ray Heuer

**LOG NUMBER:** I-10S-G-030

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**PROPOSAL 68 - 5 AAC 92.540. Controlled use areas.** Establish a controlled use area in Unit 20A as follows:

Use of all-terrain land vehicles (ATV's) is prohibited above the 2,500 foot elevation between the west bank of Delta Creek and the east bank of the East Fork of the Little Delta River up to and including the east bank of West Hayes Creek

**ISSUE:** Desecration and destruction of the natural environment and wildlife habitat by unrestricted activity of all terrain land vehicles (ATV's) during the hunting season. In addition, this unfettered activity leads to harassment of wildlife, other hunters, violation of fair chase, declining hunter ethics and hunter safety issues.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Perhaps the last silver of the north flanks of the Alaska Range between Tok and Denali Park that has been spared the destruction of natural landscape by ATV's will be lost through lack of concern by the BOG. ATV use has been allowed to create a never-ending spider web of trails across the fragile tundra that continues to expand in an unrelenting pace as more hunters utilize this method of accessing game. Permanent damage is notably visible in the alpine tundra, which is extremely slow to heal. These trails create eroded gullies, especially where they climb and descend steep terrain.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This restriction will preserve the physical and esthetic quality of the alpine terrain nestled between Mt. Moffitt and Mt. Hayes while also preventing the mechanical disturbance of the game population of the area. This area has had little to no use of ATV's in the past. However, each year they are encroaching closer, some were seen this year, illegally traversing military land with no consequences.

**WHO IS LIKELY TO BENEFIT?** Members of the public (good stewards of the land) that still appreciate the unspoiled wilderness and the natural wonders of Alaska; especially those hunters who still enjoy hunting on foot in one of the most scenic areas of the Alaska Range. Game populations will also be spared the harassment of being attacked by hunters on ATV's.

**WHO IS LIKELY TO SUFFER?** No one as this area has yet to be invaded by the ATV hunters. Historically, this area has been accessed for hunting via aircraft and foot traffic.

**OTHER SOLUTIONS CONSIDERED?** Restricting ATV's to designated trails, specific times of the day and prohibiting hunting the same day ATV's have been ridden. All were rejected for difficulty in enforcement and costs of implementing.

**PROPOSED BY:** Don Quarberg

**LOG NUMBER:** HQ-10S-G-007

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**PROPOSAL 69 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.540 (f). Controlled use areas.** Modify the motorized vehicle restriction for the Wood River Controlled use Area in Unit 20A as follows:

Motorized Vehicle access into the Wood River Controlled Use Area shall not be allowed during the period of 15 August to 30 September except for those who have a Motorized Vehicle Access Permit. Hunt area would cover from the east bank of the Totatlanika River to the north side of the Rex Trail, to the south bank of the Tanana River, and to the west bank of the Tatlanika River. The access permit would be valid for any bull. ADF&G could reallocate a number of permits for this hunt from the already authorized drawing hunt made available for Unit 20A.

**ISSUE:** Every Alaskan resident has the right for equal access into non-restricted areas of state owned land. This proposal would establish a "Motorized Vehicle Access" drawing hunt into the Wood River Controlled Use Area via the Rex Trail.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Loss of hunting opportunities for those who do not own an airplane and/or can not afford to be flown in by an outfitter or guide.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The quality of moose hunting would be improved for those who are lucky enough to obtain an access permit. This proposal offers more opportunities for those who can not afford to own airplanes or airboats.

**WHO IS LIKELY TO BENEFIT?** All Alaskans resident who are lucky enough to obtain an access permit.

**WHO IS LIKELY TO SUFFER?** No one will suffer from this proposal because of the limited hunt area and the number of permits that can be reallocated to this new area.

**OTHER SOLUTIONS CONSIDERED?** I originally thought about proposing opening the entire Rex Trail from the Totatlanika River to the Wood River. This proposal would have the potential to create negative and social issues between private land owners, outfitters, and permit holders.

**PROPOSED BY:** Larry Kappel

**LOG NUMBER:** I-10S-G-042

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**PROPOSAL 70 - 5 AAC 92.540 (f). Controlled use areas.** Allow the use of motorized vehicles for permit winners in the Wood River controlled use area as follows:

Add new paragraph (iii):

**Except those who receive a permit may use an ATV. Only those who receive a permit may transport only their gear and their game harvested.**

One would apply for a permit through a lottery system just as we do for other hunts in the state. I would make the suggestion to start out with a lower number of permits to be issued (25). And watch to see how the limited amount of ATV's impact the area. Then as we see the use we may want to increase or adjust the amount of permits accordingly.

**ISSUE:** No use of motorized vehicle within Wood River Control Use Area.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The Wood River Control Use Area has been closed to motorized vehicle for hunting for decades now. The clear history of why this area has been closed to motorized vehicle is quite clear. A couple of selfish big game guides did not like the competition from other users. I propose that some vehicle use should be tolerated. Not

every hunter who wishes to hunt this area is physically fit enough (age or health) to walk-in, or walk from one of the few landing strips. Or can afford the costly air fare.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. The Department wants some cow moose harvest out of this area. This would definitely encourage more of that. Would also help as hunters that receive this permit to get their meat out of the field in a timely fashion. Not every hunter is a young strapping prime human specimen, and would like to hunt this unique area that affords some of the state's best opportunity to harvest grizzly, sheep, moose, wolves and caribou. All in one area.

**WHO IS LIKELY TO BENEFIT?** Many hunters of age that can not pack in a camp and/or pack their game that they did harvest. Our hunters that have physical disabilities, that can not walk very far or with heavy packs. Those who can not afford air charter services. Those who receive a cow moose permit in the WRCUA.

**WHO IS LIKELY TO SUFFER?** I would imagine the guides that use that area, as they are not accustomed to non-guided hunters to move as efficiently as they do with their horses and aircraft. Those who believe ATV's have ruined enough of Alaska.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Allen F. Barrette

**LOG NUMBER:** I-10S-G-038

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**PROPOSAL 71 - 5 AAC 92.036. Permit for taking a child hunting.** Designate Creamers Migratory Waterfowl Refuge as a youth hunting and trapping area in Unit 20C as follows:

Creamers Field Migratory Waterfowl Refuge will become a youth hunting and trapping area. All youth must be accompanied by a licensed adult who would be allowed to hunt and trap. The regulation if adopted would not change other drawing permits for Creamers Field Refuge.

**ISSUE:** I believe there is a lack of hunting and trapping programs for youth.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** There will be less hunters and trappers in the future and already numbers are going down.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, you would have more use of the refuge if youth did not have to compete with adults.

**WHO IS LIKELY TO BENEFIT?** The youth in the area who would have a close place to learn hunting and trapping skills.

**WHO IS LIKELY TO SUFFER?** Adults who now use the area and do not want to mentor some youth in the area.

**OTHER SOLUTIONS CONSIDERED?** Let youth start all seasons one week early but thought that would not be popular with some adults

**PROPOSED BY:** John Krieg

**LOG NUMBER:** I-10S-G-006

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**PROPOSAL 72 - 5 AAC 92.550. Areas closed to trapping.** Restrict the use of traps near certain recreational and residential areas in Unit 20C in as follows:

To enhance the safety, comfort and overall quality of life for Healy vicinity residents and visitors, the following areas in the borough, and adjacent to common human habitat areas shall be closed to trapping;

**WEST PANGINGUE GROUP:** T12S, R8W, Sections 7, 8, 9, 16, 17 and 18. and T12S, R9W, Sections 11,12, 13 and 14 (This area is in the immediate vicinity of the Pangingue Creek Homeowners Association, and includes the state route to Eight Mile lake, where locals and visitors recreate.)

**WEST RR RESERVE GROUP:** T12S, R8W, Sections 1, 12, 13 and 24. (This area is directly adjacent to lot and home owners in the Lignite, Dry Creek and western Healy areas, and the lower Dry Creek floodplain where hikers frequent.)

**NORTH NENANA GORGE GROUP:** T13S, R7W, Sections 6, 7 and portions of 5 and 8 (This area covers Bison and Antler Creek areas, West of the Nenana River, where both locals and visitors hike on the plateaus and the NE ridges of Mt. Healy.)

Additionally, it should be emphasized that the Alaska Railroad (Healy Reserve) land is closed to all forms of use by the general public, to include trespassing (hiking, hunting & trapping) as per Alaska Statute 11.46.330 (1999).

**ISSUE:** Public Safety: Body-gripping\* traps near homes and human habitation/recreational use areas, are an existing and increasing safety risk within our community (Healy/Denali Borough). These devices kill and maim companion animals and non-target animals, and can injure children and adults. Locally, several of these devices have caught companion dogs and at least two adults. Traps pose a threat to children who may be attracted to cubbies or who may accidentally step in them. In the Healy/Denali Borough, these devices have been found along the Parks Highway, near homes, on popular recreational trails, and in one case, right next to a school bus stop.

Alaska law does not require traps/snares to be flagged or identified and does not require trappers to post warning signs notifying the public of the presence of traps. Local residents and tourists who travel to our area year round are often unaware of the risk, and may unknowingly venture up

a roadside trail or let their pet out at a pull-out, exposing themselves and their pets to serious danger. Traps are baited and lure dogs (on or off-leash) into traps along side of the trail. Additional danger is encountered when a human must expose oneself to injury and great emotional despair while trying to release an injured or dead pet non-target animal from a trap.

In Healy/Denali Borough, residents are restricted from walking on Alaska Railroad land, Native land, Usibelli Mine land and private land. The railroad land (Healy Reserve) nearly surrounds the community of Healy, and is off limits to any trespassing (i.e. walking, hunting, trapping). Although this large block of land (6,226 acres) it is not open to trespassing, most local residents are not aware of this closure, and many forms of recreational land use occur on the reserve. As a result, the trespassing walker/hiker may still run into trespassing traps or trap lines when "trespassing" on AKRR Reserve land. A lack of marking or knowledge of the locations of the AKRR Reserve boundaries exacerbates this problem. Further, the State land along the Parks Highway is popular for all forms of recreation, but it is also dangerous due to the threat of known and/or unknown traps or trap lines.

Thus, many borough residents feel "shut out" of the land within our own community. Residents feel that there is not a safe place to recreate with children or companion animals. The rural quality of life in the Healy area is lost to "living in a mine field," with such fields sometimes directly adjacent to private lots and home sites.

\*"Body-gripping device" includes any snare (neck, body or leg), kill-type trap (Conibear), leg hold trap (steel-jaw, padded and offset), and any other device designed to grip a body or body part.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Pets, children and adults will continue to be threatened or hurt by traps in close proximity to homes. Locals, as well as visitors and their pets will encounter traps practically underfoot in and around the residential areas and along roadsides. This not only poses a safety risk, but creates or lends to poor relations between the hunters and trappers and the rest of the community. Both community safety and public relations are the continued placing of traps near residential areas.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** There should be no effect on the quality of the resource harvested (pelts), however, the public relations improvement would likely greatly enhance the public perception of the industry.

**WHO IS LIKELY TO BENEFIT?** The entire community, including both trappers and non-trappers, and their families, will benefit if this solution is adopted. Public safety benefits everyone. Residents, in-state visitors, tourists and companion animals alike will be able to walk, run, hike, ski, ice climb, ski-jour and mush safely in our community without the year-round threat and fear of traps in or on nearby community lands, roads and common use trails.

**WHO IS LIKELY TO SUFFER?** Trappers who formerly trapped close to homes, roads, frequented community trails and human habitation, will have to go further (relatively ½ to 1 mile) from these facilities to trap.

**OTHER SOLUTIONS CONSIDERED?** Public meetings have demonstrated that our local government/borough assembly is not taking action due to the fact it is perceived as a Fish and Game issue.

"Share the Trail" workshops have been well attended but these workshops do not address the issue that dangerous body-gripping traps may be encountered in our neighborhoods, on popular trails and all the public lands in and around Healy furthermore, recreational users do not necessarily how they are "sharing" a trail since traps do not have to be marked. While the workshop teaches participants how to open traps, it is extremely difficult or impossible for one individual to release a dog from a Conibear.

Trail or trap signing was considered, but effectively locating such signs seems difficult, and younger children or companion animals can't read.

Denali National Park is an option for safe recreation but it is a significant drive for many to get to, and dogs are restricted from walking on rails (only on the roadsides).

One local highway trapper has offered to cut new trails with companion animals, trap lines, but most folks are not looking for more impact on the area. Furthermore, there would be no restriction from another tapper setting traps on the newly cut trail.

**PROPOSED BY:** Barbara Brease and Gretchen Shaw

**LOG NUMBER:** I-10S-G-018

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**DELTA JUNCTION AREA – UNIT 20D**

**PROPOSAL 73 - 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in Unit 20D as follows:

<b>Units and Bag Limit</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
...		
(18)		
...		
Unit 20(D), that portion lying south of the north bank of the Tanana River and east of the west bank of the Johnson River, except that portion within the Robertson River drainage south of the confluence of the east and west forks, and within one mile west of the west fork	Sept. 1 - Sept. 15	No open season.
1 bull		
Unit 20(D), that portion within the Robertson River drainage south of the confluence of the east and west forks, and within one mile west of the west fork		

RESIDENT HUNTERS:

1 bull

Sept. 1 - Sept. 15

NONRESIDENT  
HUNTERS:

1 bull with 50-inch antlers  
or antlers with 4  
or more brow tines  
on one side

Sept. 5 - Sept. 15

Unit 20(D), that  
portion lying  
west of the west  
bank of the  
Johnson River and  
south of the  
north bank of the  
Tanana River,  
except the Delta  
Junction  
Management Area  
and the Bison  
Range Youth Hunt  
Management Area

RESIDENT HUNTERS:

1 bull with spike-fork or  
50-inch antlers or antlers  
with 4 or more brow tines  
on one side; or 1 bull by  
drawing permit; or

Sept. 1 - Sept. 15  
(General hunt only)  
Sept. 1 - Sept. 15  
(General hunt only)

1 antlerless moose  
by drawing permit  
only; up to 1,000  
permits may be issued  
in combination with  
that portion in the  
Delta Junction  
Management Area; a  
person may not take  
a calf or a cow  
accompanied by a  
calf; or

Oct. 10 - Nov. 25  
(General hunt only)

1 antlerless moose by registration permit only; a person may not take a calf or a cow accompanied by a calf

Oct. 10 - Nov. 25  
(General hunt only)

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side

Sept. 5 - Sept. 15

Unit 20(D), that portion within the Bison Range Youth Hunt Management Area

Sept. 1 - Sept. 30

Sept. 1 - Sept. 30

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf

Sept. 1 -Sept. 30  
(General hunt only)

Sept.1 - Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

**RESIDENT HUNTERS:**

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 30 permits may

Sept. 1 - Sept. 15  
(General hunt only)

be issued; or

1 antlerless moose  
by drawing permit only;  
up to 1,000 permits  
may be issued in  
combination with  
that portion lying  
west of the west  
bank of the Johnson  
River and south of  
the north bank of  
the Tanana River; a  
person may not take  
a calf or a cow  
accompanied by a  
calf; or

Oct. 10 - Nov. 25  
(General hunt only)

1 antlerless moose by  
registration permit only;  
a person may not  
take a calf or a  
cow accompanied by  
a calf

Oct. 10 - Nov. 25  
(General hunt only)

**NONRESIDENT  
HUNTERS:**

1 bull with 50-inch  
antlers or antlers  
with 4 or more brow  
tines on one side  
by drawing permit  
only; up to 30  
permits may be  
issued

Sept. 5 - Sept. 15

Unit 20(D), that  
portion within the Healy  
River drainage

**RESIDENT HUNTERS:**

1 spike-fork bull or;

Aug. 15 - Aug. 28

1 bull

Sept. 1 - Sept. 20

**NONRESIDENT**

HUNTERS:

1 bull Sept. 1 - Sept.20

Unit 20(D), that portion Sept. 1 - Sept. 20 Sept. 1 - Sept. 20  
lying north of the  
north bank of the  
Tanana River and  
draining into the  
Volkmar River east  
to include the  
Billy Creek drainage,  
excluding that portion  
within the Healy River  
drainage

1 bull

Remainder of Unit 20(D)

1 bull Sept. 1 - Sept. 15 Sept. 1 - Sept. 15

...

**ISSUE:** Antlerless moose hunting seasons must be reauthorized annually. Reauthorization of the permit hunts for cow moose without calves is necessary in southwest Unit 20D (south of the Tanana River and west of the Johnson River) to stabilize the population as needed and contribute toward meeting the intensive management harvest objective of 500–700 moose. We expect that, in most years when antlerless permits are needed, only drawing permits will be issued. Registration permits will be issued in combination with drawing permits to obtain additional harvest only in years and areas where additional harvest is needed to maintain optimal moose densities.

The density of moose in Unit 20D has reached the intensive management population objective of 8,000–10,000 moose. The highest density of moose was in southwest Unit 20D at 5.6 moose/mi<sup>2</sup> during 2006. The moose population in southwest Unit 20D was demonstrating the effects of increased competition for food, with a moderately low level 2-year average twinning rate of 14%. Also, browse surveys indicated that moose are consuming moderately high quantities (25%) of available browse over winter. Antlerless moose hunts in 2006–2009 have helped to reduce the density of moose in southwest Unit 20D to 3.9 moose/mi<sup>2</sup>. Continued antlerless hunts are needed to maintain the population at this density. Extensive management and research data to guide antlerless hunt decisions are being collected in this area during 2009 and 2010, including calf weights, twinning rates, a population estimate, an extensive browse utilization survey, and aerial survey sightability data.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The moose population in southwest Unit 20D may again increase to unacceptable levels or may need further reduction when new data is available and analyzed.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Passage of this proposal will allow the department to manage the southwest Unit 20D moose population at optimum population levels as needed. It will also allow hunters to harvest moose toward meeting the Unit 20D intensive management harvest objective without reducing the bull-to-cow ratio to low levels.

**WHO IS LIKELY TO BENEFIT?** The moose population will benefit by having a population density compatible with their habitat. Moose hunters will benefit by increased moose harvest.

**WHO IS LIKELY TO SUFFER?** Those people who are opposed to intensive management harvest strategies.

**OTHER SOLUTIONS CONSIDERED?** No antlerless permits or more antlerless permits.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-72

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**PROPOSAL 74 - 5 AAC 85.010. Hunting seasons and bag limits for bison.** Modify the bison season dates for residents and nonresidents as follows:

Open Season: **July 1 - June 30** [JULY 20 - MARCH 31]

**ISSUE:** The inability of bison hunters to meet the harvest objective. This would also give the ADFG the flexibility to adjust the hunting season to remove undesirable bison (those that fail to migrate off private land in the spring) and to use hunting to affect the bison migration (hunt those that migrate early from public to private land).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** It will be more difficult for the harvest objective of the Delta Bison Herd to be met. Problems with bison that fail to migrate or migrate early on to private lands will not be easily rectified.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Typically the Department does not open hunting season until October 1. The intent of this proposal is NOT to have a year around season; rather the intent is to give the Department more discretionary authority to take animals at other times if necessary. The quality of the bison harvested would not change. However, the ability of the Department to diminish the crop degradation by the bison herd, as mandated by law, would be improved and thus the quality of the hunt.

**WHO IS LIKELY TO BENEFIT?** Private land owners suffering bison crop damage and hunters who are given more opportunity to harvest a bison.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Fencing the bison on the bison range (this is illegal as they are mandated to be a wild and free-ranging herd). Translocating the bison to some other area (too costly and not supported by the public). Eliminating the herd (not supported by the public).

**PROPOSED BY:** Delta Bison Working Group

**LOG NUMBER:** I-10S-G-019

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**PROPOSAL 75 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions.** Allow the taking of Delta bison the same day airborne as follows:

...

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

...

**(G) taking bison in Unit 20(D), provided the hunter is at least 300 feet from the airplane at the time of taking.**

**ISSUE:** Bison can be difficult to locate in the Delta Junction area. Hunter success is declining for the Delta bison drawing permit hunt, making attaining adequate harvest to meet the herd size objective more difficult. Success has declined from 100% in the 1970s to 67% in 2009. Recently, ADF&G has been issuing increasing numbers of drawing permits to attain the needed harvest. The number of permits is now more than the hunt area can accommodate. Hunters frequently complain about too many hunters in the field, interfering with each others' hunts, further reducing success rates. Allowing permit winners to hunt the same day airborne should improve hunter success rates, allowing the department to better manage for the herd size objective.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The department will continue to issue more drawing permits than the bison hunt area can satisfactorily accommodate.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Hunt quality will improve for hunters who draw permits. Local landowners will benefit from fewer hunter contacts, and Delta bison herd size will be managed within herd size objectives to help reduce bison-agriculture conflicts.

**WHO IS LIKELY TO BENEFIT?** Delta Junction area farmers and landowners, and bison hunters who draw permits.

**WHO IS LIKELY TO SUFFER?** There will be reduced numbers of Delta bison drawing permits issued.

**OTHER SOLUTIONS CONSIDERED?** We considered asking the department to issue either-sex bison permits to increase hunter success. However either-sex permits result in higher wounding rates for bison and result in skewed sex ratios in the herd.

**PROPOSED BY:** Delta Junction Fish and Game Advisory Committee

**LOG NUMBER:** I-10S-G-040

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**PROPOSAL 76 - 5 AAC 92.080 (7). Unlawful methods of taking game; exceptions.** Allow radio communications to locate bison in Unit 20A as follows:

5 AAC 92.080 (7) (D) would be amended to allow the use of radio communications, cellular or satellite telephone to locate bison in Unit 20D.

**ISSUE:** Difficulties finding bison in Unit 20D. Difficulties meeting harvest objective.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The possibility that the harvest objectives will not be reached.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Hunters receiving permits to hunt the Delta Bison Herd. Agricultural producers who have crops damaged by the Delta Bison Herd.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Michael Paschall

**LOG NUMBER:** HQ-10S-G-008

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**PROPOSAL 77 - 5 AAC 85.010. Hunting seasons and bag limits for bison.** Make specific radiocollared bison illegal to shoot in the Delta bison herd as follows:

<b>Units and Bag Limit</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(3)

Unit 20(D)

July 20 - Mar. 31  
(General hunt only)

July 20 - Mar. 31

1 bison every **10** [5] regulatory years  
by drawing permit only, **except**  
**that a bison wearing a**  
**radio collar of the kind specified**  
**by the department may not**  
**be taken**; up to 200 permits will  
be issued

**ISSUE:** Delta bison hunters annually shoot 2–6 of 10–15 radiocollared female bison which makes herd management more difficult and dangerous. We suspect that many hunters intentionally shoot radiocollared bison because they are known-sex animals (only female bison are radiocollared), and radiocollared bison are killed almost exclusively by cow permit holders.

The Delta bison herd is managed very intensively. The department attempts to keep 10–15 female bison radiocollared to monitor the herd. If radiocollared bison are not available, population estimates will be less reliable, making it necessary to manage the harvest more conservatively, thus reducing hunting opportunity. Also, it will be difficult to determine bison movements, hampering our ability to evaluate crop damage mitigation efforts.

Placing radio collars on bison can be problematic. The department has a short annual window of opportunity to radiocollar bison during about April 1–15, after the hunting season closes and before calving begins; and during July 1–August 30, after calving and no sooner than 30 days before the hunting season opens on October 1. During much of this time, bison are not accessible for radiocollaring because they are on military impact areas where the department is not allowed to work. The unpredictability of bison movements also makes it difficult to schedule aircraft for radiocollaring operations. In addition, radiocollaring is expensive and dangerous for both bison and department personnel, so when a hunter shoots a radiocollared bison it necessitates an additional expensive and dangerous operation.

Hunters shoot radiocollared bison even though they are asked not to do so during the required Delta bison hunter orientation. If this regulation is adopted, the department intends to begin replacing existing radiocollars with highly visible color-coded, or visibly numbered radio collars as the existing collars fail. The intent of using visual collars is to allow hunters to more readily see the collars to allow identification of nonfunctioning radio collars so that hunters can take bison wearing collars that no longer function due to age.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunters will continue to shoot radiocollared bison disproportional to their occurrence in the herd, making herd management more difficult, expensive, and dangerous.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Herd management will be improved with a well-maintained sample of radiocollared bison in the herd.

**WHO IS LIKELY TO BENEFIT?** Improved herd management will benefit hunters, area farmers and other segments of the public interested in management of the Delta bison herd.

**WHO IS LIKELY TO SUFFER?** Visual collars placed on bison will not be aesthetically pleasing to people interested in viewing bison. Hunters who shoot radiocollared bison will be cited.

**OTHER SOLUTIONS CONSIDERED?** We considered cutting off the top one-third of the bison horns at the time they are radiocollared. This would destroy the trophy value and give hunters less incentive to shoot radiocollared bison. The advantage of this option is that it would not require a regulation to implement and it would be less visually distracting than placing visual collars on increasing numbers of bison that will remain in place for approximately 15 years. We considered adding this regulation to discretionary permit authority, but it is primarily a Delta bison herd management issue. We also considered maintaining the status quo so that it is not illegal to shoot radiocollared bison.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-053

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**MCGRATH AREA – UNITS 19, 21A, & 21E**

**PROPOSAL 78 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Eliminate the nonresident closed area for caribou in Unit 19A as follows:

Remove all wording about non-resident closed area in Unit 19A

**ISSUE:** Remove the non-resident closed area in 19A. The area is currently closed to the taking of moose and caribou by non-residents. This will help simplify the regulation of 19A.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Will help make the hunting regulations more user friendly.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Everyone.

**WHO IS LIKELY TO SUFFER?** No users will suffer.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Wade Renfro

**LOG NUMBER:** HQ-10S-G-006

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**PROPOSAL 79 - 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.** Change registration permit and general hunt areas and season dates in Unit 19D as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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...

(17)

...

Unit 19(D), that portion  
in the Upper  
Kuskokwim Controlled  
Use Area

[, THAT  
PORTION OF THE  
KUSKOKWIM RIVER  
DRAINAGE UPSTREAM  
FROM THE SELATNA  
AND BLACK RIVER  
DRAINAGES, BUT  
EXCLUDING THE  
TAKOTNA RIVER  
DRAINAGE UPSTREAM  
OF TAKOTNA VILLAGE]

1 antlered bull  
by registration  
permit; **or**

Sept. 1 - Sept. 25

No open season.

**1 moose by registration permit;  
during the period Feb. 1–28, a  
season may be announced by  
emergency order**

**(To be announced)**

**No open season.**

[UNIT 19(D), THAT  
PORTION OF THE  
TAKOTNA RIVER  
DRAINAGE UPSTREAM  
OF TAKOTNA VILLAGE]

[1 ANTLERED BULL  
BY REGISTRATION  
PERMIT]

[SEPT. 1 - SEPT. 20]

[NO OPEN  
SEASON.]

Unit 19(D), that  
portion  
between and  
including the  
Cheeneetnuk and  
Gagaryah River  
drainages,  
excluding that  
portion within 2  
miles of the Swift  
River

RESIDENT HUNTERS:  
1 **antlered** bull; **or**

Sept. 1 - Sept. 20

**1 antlered bull  
by registration  
permit; or**

**Sept. 1 - Sept. 25**

**No open season.**

**1 moose by registration permit;  
during the period Feb. 1–28, a  
season may be announced by  
emergency order**

**(To be announced)**

**No open season.**

NONRESIDENT HUNTERS:

1 bull with 50-inch  
antlers or antlers  
with 4 or more brow  
tines on one side

Sept. 1 - Sept. 20

Remainder of Unit 19(D)

1 **antlered** bull; **or**

Sept. 1 - Sept. 20

No open season.

**1 antlered bull  
by registration  
permit; or**

**Sept. 1 - Sept. 25**

**No open season.**

**1 moose by registration permit;  
during the period Feb. 1–28, a  
season may be announced by  
emergency order**

**(To be announced)**

**No open season.**

**ISSUE:** Moose numbers have increased in Unit 19D East since predation control began in 2003. Therefore, additional moose hunting opportunity is warranted. This proposal simplifies moose hunting seasons and expands resident moose hunting opportunity in Unit 19D to help achieve intensive management objectives.

*September Antlered Bull Season*

This proposal provides additional general season hunting opportunity to access an underutilized harvestable surplus of moose outside the Upper Kuskokwim Controlled Use Area (CUA) during a Sept 1–20 season and simplifies regulations.

The existing RM650 registration permit will remain the only harvest permit available for use in the CUA. This will maintain appropriate hunting pressure in that area, which has higher hunting pressure from boat-borne hunters. The registration permit is also expanded to all of Unit 19D, lengthening the hunting season by 5 days upstream from Takotna. Hunters will be allowed to use either the registration permit or a harvest ticket in the remainder of Unit 19D, simplifying permit and harvest ticket requirements. In addition, all seasons are standardized to a bag limit of one *antlered* bull in order to minimize confusion among hunters.

### February Any Moose Season

The February any moose hunt will be used as needed to keep the moose population in the Upper Kuskokwim Villages Moose Management Area (MMA, specified in 5 AAC 92.125 (f)(2)(A)) at healthy levels and to provide additional hunting opportunity. The decision to hold this to-be-announced season will be based on 2-year average twinning rates and other available biological information. We will establish the hunt area and harvest quota under discretionary permit authority based on the best population information available and September harvest data. Permits will be available in Unit 19D throughout the February season and a 2-day reporting requirement will be imposed so the harvest quota is not exceeded.

The moose population in the MMA has approximately doubled since 2003 and annual browse removal by moose has increased to approximately 47 percent of available browse. This is a higher browse removal rate than in Unit 20A which has low productivity, as evidenced by low twinning rates and other indicators. Although 2-year average twinning rates in Unit 19D remain above 25 percent, it may become necessary in the near future to harvest cows to either slow population growth or reduce the number of moose in the MMA.

We do not expect to open the winter season during 2010–2011 given our current twinning rates, but the upward trend of the moose population in this area makes it prudent to establish this season now so we will be able to respond if we observe a decline in twinning rates. If the hunt is opened, it will increase opportunity for hunters and help achieve intensive management objectives.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The additional opportunity that has developed since the inception of predation control will not be used. Further, the moose population in the MMA may continue to grow and become stressed by density dependent effects.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, the moose population will remain healthy.

**WHO IS LIKELY TO BENEFIT?** Hunters who use the RM650 permit will benefit through longer seasons. Hunters who use the general harvest ticket will benefit through additional access to large areas formerly closed to a general hunt. If the February season is announced, hunters who do not harvest a moose in September will benefit. All hunters will benefit through simplified regulations.

**WHO IS LIKELY TO SUFFER?** Hunters who object to increased crowding that may occur in isolated areas on the periphery of the CUA and people who are opposed to harvesting cows will suffer.

**OTHER SOLUTIONS CONSIDERED?** A winter season by registration permit for resident hunters with a bag limit of any moose to be held outside the two mile corridor that makes up the Upper Kuskokwim CUA. This was rejected because of the difficulty of identifying the Upper Kuskokwim CUA boundary during winter.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER: HQ-10S-G-041**

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**PROPOSAL 80 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the moose season for nonresidents in Unit 21A as follows:

The moose season in Unit 21A would be from September 5 - 25 for both residents and non-residents. The residents would still be allowed any bull and non-residents would still have the 50 inch restriction.

**ISSUE:** Extend the non-resident moose season in 21A from September 5 through September 15. The non-resident success has dropped since the season was shortened a few years ago. Resident season is now September 5 - 25 with any bull being legal. Non-residents would still have the 50 inch restriction which would not affect the overall moose population. The recent moose survey showed there were 64 bulls per 100 cows. This would allow the harvest of a few more 50 inch bulls without hurting the overall moose population. With some of the non-resident hunters hunting all or a portion of the extra five days, I think there would be about five to seven additional 50 inch bulls harvested in 21A, this would not be a significant increase in harvest to affect the general population. The recent survey also showed 40 calves per 100 cows which shows a healthy moose population.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** With the warm weather the past few years non-residents have not had a chance to hunt moose in the rut since the season was changed to end on September 20.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** It would give the non-residents a better chance at a quality animal.

**WHO IS LIKELY TO BENEFIT?** The non-residents and the guides operating in the Innoko Wildlife Refuge. The season is too short now for two 10-day hunts and shorter hunts are not very productive and doing just one hunter per guide is cost prohibitive.

**WHO IS LIKELY TO SUFFER?** No one will suffer. The hunting pressure in 21A has been less in the past few years and the residents would still have the advantage of being able to take any bull.

**OTHER SOLUTIONS CONSIDERED?** If the season for non-residents has to be 5 (five) days shorter than the resident season make it September 10 - 25. This would help make the season later but would still not solve the guide problem of two ten day hunts.

**PROPOSED BY:** Stevan H. White

**LOG NUMBER: HQ-10S-G-011**

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**PROPOSAL 81 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the moose season for nonresidents in Unit 21A as follows:

**Option 1:**

Extend the nonresident hunt in Unit 21E: One bull with 50 inch antlers or antlers with four or more brow tines on at least one side by permit from September 5th to September 25th.

**Option 2:**

Extend the nonresident hunt in Unit 21E: One bull with 50 inch antlers or antlers with four or more brow tines on at least one side by permit from September 5th to September 30th.

Option one is preferred.

**ISSUE:** The problem that Alaska Pike Safari's and Wilderness Adventures (APSWA) would like the board to address lies in Unit 21E. APSWA would like to see the original September 5th to September 25th for harvesting moose be reinstated again for the nonresident hunters.

The Yukon-Innoko Moose Management Plan had established non resident hunting season for September 5th to Sept. 20th If you look at the prior three years the number of moose taken is below the objective for the non resident hunter. First of all a quota was set for thirty moose to be harvested by the Yukon-Innoko Moose Management Plan. There were 60 permits honored for 48 transported and 12 guided, for a hopeful, success rate of 30 moose harvested by the Department. Note: At any time these permits were not even getting close to being filled and this is since the beginning of the permit process, At this time, a summary of moose harvest taken by permit reads:

- 2007- 45 hunters (guided/transported) 12 moose harvested
- 2008- hunters (guided/transported) 10 moose harvested
- 2009- 31 hunters (guided/transported) 7 moose harvested

By the shortening of the non-resident hunting season (September 5 - September 20), has made it very difficult for the non-resident for a fair percentage rate of harvest. A big factor to consider is the global warming and its direct effect on the fall season. This has caused a sluggish rut in the last seven years. For the first time, we have noticed that calves are being born during the first week of June vs. mid May- the prime time for calving. This is a true indicator that the fall rut is definitely moving to late September and even to the first part of October. Many years back the fall seasons had clear nights, frosty mornings and even snowfall during the moose hunting season. Mother Nature has definitely changed her rhythm.

The Federal Subsistence Board is considering a change, for fall 2010, from the original (Sept. 5 - Sept. 25) hunting regulations for resident hunting to read: Sept. 5th - Sept. 30th in Unit 21E.

These are some of the reasons why APSWA is asking to get back the last five days of hunting for the non-resident hunter.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** What may happen is many of the

nonresident hunters who are transported or guided will lose interest in moose hunts in Unit 21E. The hunters feel positive they will have a better chance to harvest a moose if they have additional hunting days. Possible state and local business revenue may also decline.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, when moose meat is harvested during the later season and taken care of in cooler weather, it is given time to cure properly and a better product is produced. The care of a harvested moose out in the field depends greatly on the right time of year.

**WHO IS LIKELY TO BENEFIT?** If the preferred solution is adopted the resident hunter would benefit because they prefer to hunt earlier in the season for a younger moose; the nonresident hunter would rather hunt later in the season for a trophy moose. When a nonresident hunter harvests a moose, the majority of the time he/she takes home some of the meat. Local residents benefit gain by the nonresidents harvest, releasing possession of the rest of the meat to them.

**WHO IS LIKELY TO SUFFER?** We perceive no one will suffer if this solution is adopted. Each type of hunter is adequately supplied with the number of days to harvest a moose.

**OTHER SOLUTIONS CONSIDERED?** To open a nonresident hunt from September 5th to September 30th because the State regulates the permits and controls the outcome of the number of moose taken. This gives the nonresident who applies for a permit, and is awarded one, a better chance to harvest a moose. It would be better to give out less permits for a better success rate. For example go from 60 permits to 40 permits and hopefully meet the harvest goal of 30 bulls. This gives the nonresident hunter a more spread out time to hunt so that they are not all piled together. A better quality hunt. We feel that every one of your permits will be applied for, if this would happen. Why APSWA rejected this is because APSWA felt that we would not be given the extra five days up to September 30th.

**PROPOSED BY:** Bruce Werba, Owner, Alaska Pike Safari's and Wilderness Adventures

**LOG NUMBER:** I-10S-G-047

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**PROPOSAL 82 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Open a registration hunt for Dall sheep in Unit 19C for residents as follows:

Open by registration hunt for the communities of Nikolai, Telida, McGrath, Takota. Three permits for each community from October 1 to March 30, no aircraft, 3/4 curl or less, ewes with no lamb.

**ISSUE:** We would like a registration hunt by permit for Dall sheep in Unit 19C for the communities of Nikolai, Telida, McGrath, Takota. We have traditionally hunted for sheep in all the major drainages in the past during winter months when access to the hunting grounds was more accessible the first snowfall.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The sheep could decline from loss of habitat due to over grazing. The people who have customarily and traditionally used the resource do not have access during the August and September hunt. Because they traditionally harvested after the first snow.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Definitely, we believe to many large rams are harvested by non-residents, people who are not from the immediate area. Small rams could start breeding, gene pool could go down. If sheep numbers are low we will close season by emergency order.

**WHO IS LIKELY TO BENEFIT?** All people who use the resource will benefit especially the people who have customarily and traditionally harvested the sheep. As it is now the law primarily benefits non-residents, people who do not live in the immediate area.

**WHO IS LIKELY TO SUFFER?** Because of the small number requested, no one should suffer. We should consider this a six year project by all agencies involved. We are open to all suggestions and solutions to utilize this resource.

**OTHER SOLUTIONS CONSIDERED?** Access is by aircraft only during the August and September hunt. People who are not from the immediate area benefit

**PROPOSED BY:** Dan Esai

**LOG NUMBER:** I-10S-G-010

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**PROPOSAL 83 – 5 AAC 92.010. Harvest tickets and reports.** Eliminate the early reporting requirement for wolves harvested in the Unit 19D East wolf predation control area as follows:

**5 AAC 92.010. Harvest tickets and reports**

...

[**(K) FOR WOLVES, A HUNTER OR TRAPPER WHO TAKES A WOLF IN THE UNIT 19(D)-EAST WOLF PREDATION CONTROL AREA, DESCRIBED IN 5 AAC 92.125(1) , SHALL REPORT THE SEX, DATE, AND LOCATION OF THE KILL TO THE DEPARTMENT'S DIVISION OF WILDLIFE CONSERVATION OFFICE IN MCGRATH WITHIN 10 DAYS OF HARVEST.**]

**ISSUE:** A shortened harvest reporting period is a tool to closely monitor the take of wolves and was considered necessary to avoid taking too many wolves by a combination of wolf control, hunting, and trapping, and leaving fewer than 40 wolves in Unit 19D East. This requirement has not proven to be necessary. Most of the wolves taken in this area are taken under the wolf control program which already requires timely reporting. Further, aerial wolf control is conducted only in a portion of Unit 19D East, helping to assure that no fewer than 40 wolves will remain in the

entirety of 19D East. Emergency order closures to assure a minimum number have not been necessary.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** This unnecessary requirement will persist.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Hunters and trappers will benefit by removing this inconvenient requirement. In particular, trappers who spend long periods on the trapline will benefit. Alaska Wildlife Troopers will be relieved from enforcing an unnecessary requirement.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-042

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**PROPOSAL 84 - 5 AAC 92.125. Predation Control Areas Implementation Plans.** Establish a Unit 21E predation control implementation plan as follows, with implementation of wolf control activities only if the midpoint of the moose population estimate declines below 1.0 observable moose per square mile in the moose survey area as follows:

...

(j) **Unit 21(E) predation control area:** The Unit 21(E) Predation Control Area is established and includes all of Unit 21(E), encompassing approximately 7,995 square miles; this predation control program does not apply within National Wildlife Refuge Lands unless approved by the federal agencies; notwithstanding any other provision in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct a wolf population reduction or wolf population regulation program in the Unit 21(E) Predation Control Area:

(1) the discussion of wildlife population and human use information is as follows:

- (A) a GASH moose management area (MMA) is established within the Unit 21(E) Predation Control Area; the MMA encompasses approximately 2,617 square miles, adjacent to the village of Grayling and surrounding the villages of Anvik, Shageluk, and Holy Cross; the purpose of the MMA is to focus intensive management activities, including predation control and habitat management, in a relatively small area near villages where moose are most accessible to hunters, rather than spread this effort over the entire game management unit; wolf control will be conducted only within the MMA; the department has the discretion to adjust the size and shape of the MMA up to 40 percent (approximately 3,700 square miles) of Unit 21(E);

- (B) prey population information is as follows:
- (i.) local residents and other hunters have reported a decline in the Unit 21(E) moose population since the mid 1990s and are concerned that additional declines may occur; however, there are few data available on the number of moose prior to 2000 for comparison; population estimation surveys were conducted in March 2000 and 2005 and February 2009 in a 5,070-square mile moose survey area (MSA); estimates at the 90 percent confidence level without sightability correction factors were  $5151 \pm 13$  percent (1 moose per square mile),  $4673 \pm 17$  percent (0.9 moose per square mile) and  $6218 \pm 17$  percent (1.2 moose per square mile), respectively; because the ranges of these estimates overlap, they likely do not indicate a detectable change in the moose population between 2000 and 2009; extrapolating the February 2009 estimate to all of Unit 21E resulted in an estimated observable moose population size of 6,205–8,747;
  - (ii.) the intensive management moose population objective established by the board for Unit 21(E) is 9,000–11,000 moose;
  - (iii.) the objective for observable moose within the MSA is a minimum of 5,070, as estimated from aerial surveys and not corrected for sightability; achieving this objective will contribute to achieving the Unit 21(E) intensive management population objective;
  - (iv.) the intensive management moose harvest objective established by the board for Unit 21(E) is 550–1,100 moose;
  - (v.) the moose harvest objective within the MSA is a minimum of 203 (4 percent of 5,070) during each regulatory year; achieving this objective will contribute to achieving the Unit 21(E) intensive management harvest objective;
  - (vi.) composition surveys conducted during November 1987–1998 and 2007–2008 in the Holy Cross area indicated that bull-to-cow ratios and calf-to-cow ratios were at or above 25–30 bulls:100 cows and 30–40 calves:100 cows; November 2009 composition surveys revealed a similarly high bull:cow ratio, but a lower calf:cow ratio of 18 calves:100 cows.
  - (vii.) based on available data, habitat is probably not a factor limiting moose population growth in Unit 21(E); a browse survey conducted during spring 2006 indicated that moose were removing 21 percent of current annual biomass, which is a moderate level along the gradient of removal observed in Interior moose populations; seven aerial surveys conducted during spring 2000–2009 have shown an average twinning rate of 31 percent (range: 16–50 percent), which suggests habitat is not presently limiting productivity in moose;
  - (viii.) if the moose population declines below 1.0 observable moose per square mile, total estimated mortality would likely be high relative to the size of the moose population; information gained from studies on moose in Unit 19(D) East and other areas of Alaska, and observations by local residents suggest that wolves would be a limiting factor for moose in Unit 21(E); research from Unit 19(D) East also indicates that black and brown bear predation could be a factor that contributes to

calf moose mortality, and bears may be limiting the moose population in Unit 21(E);

- (ix.) the harvestable surplus in Unit 21(E) is 248–350 moose based on a conservative harvest rate of 4 percent of the total estimated population;
  - (x.) the estimated observable moose population in Unit 21(E) is lower than the intensive management population objective; the number of animals that can be removed from the Unit 21(E) moose population on an annual basis without preventing growth of the population or altering the composition of the population in a biologically unacceptable manner is less than the harvest objective established for the population in 5AAC 92.108;
  - (xi.) the 2009 estimate of 1.2 observable moose per square mile within the Unit 21(E) MSA is considered to be slightly higher than the range of densities associated with low density dynamic equilibrium moose populations that are predator limited; a decline in moose numbers would result in the population moving into the low density dynamic equilibrium state; once in that state, the moose in Unit 21(E) are likely to persist at lower density with little expectation of increase unless a wolf control program is conducted; results from moose mortality studies, and predator and prey studies, conducted throughout Alaska and similar areas in Canada indicate that reducing the number of wolves in Unit 21(E) can reasonably be expected to increase the survival of yearling and older moose; wolf control activities within the MMA can reasonably be expected to increase moose densities in that and surrounding areas and increase the number of moose that can be harvested;
- (C) human use information for the prey population is as follows:
- (i.) the board identified moose in Unit 21(E) as important for providing high levels of harvest for human consumptive use in accordance with AS 16.05.255(e)–(g);
  - (ii.) estimated average annual moose harvest by all Alaska resident hunters in Unit 21(E) was 311 between 1996 and 2005; this estimate was based on all available harvest data, including harvest ticket reports, Division of Subsistence household surveys, and other subsistence research; the average nonresident harvest between 2000 and 2004 was 30 moose;
  - (iii.) according to harvest ticket reports, the number of moose harvested Unit 21(E) declined from an average of 182 annually during the 1998–2002 seasons to 124 during the 2003–2008 seasons; most of this decline can be attributed to a decrease in non-local harvest; since the early 2000s, this change includes a reduction in the number of hunters from Unit 18 who travel upriver to hunt moose in Unit 21E because moose have become more abundant in Unit 18;
  - (iv.) in a March 2002 report to the board, the Division of Subsistence estimated the average annual harvest of moose by residents of Unit 21(E) during the 1996–1999 seasons was 226; Division of Subsistence household surveys indicated harvest by residents of Unit 21(E) during 2002, 2003, and 2004 seasons was 133, 118, and 94 respectively; harvest was unusually low in 2004 due to low water and to forest fires that burned from summer until the fall moose hunting season; in recent years annual harvest has included approximately 20–25 cows;

- (v.) the amount necessary for subsistence established by the board for Unit 21 is 600–800 moose;
  - (vi.) the intensive management harvest objective in Unit 21(E) is 550–1,100; as the moose population increases and more harvest can be allowed, a greater portion of the unmet demand for moose in Unit 21(E) can be satisfied; based on management experience gained in Unit 19(D) East and other areas of Alaska, an increase in the moose population is expected if the wolf population is reduced substantially; a reduction in the number of wolves would result in a higher rate of increase in the number of moose available for harvest; although the most pronounced effect is expected to be within the MMA, it is reasonable to expect some lesser degree of increase in the moose population in the area immediately surrounding the MMA because of a reduction in wolf predation; if the moose population were to decline without a wolf predation control program in place, there is a low probability that a further decline in the moose population could be prevented and recovery initiated to meet harvest demands including local subsistence needs;
- (D) predator population information is as follows:
- (i.) the pre-control wolf population in Unit 21(E) was estimated for fall 2008 using a partial survey in March 2009 conducted in 3,600 square miles, combined with observations made during the February 2009 moose survey, sealing records and anecdotal observations; these data were extrapolated to all of Unit 21(E), and resulted in an estimate of 146–156 wolves or approximately 18–20 wolves per 1,000 square miles; in areas with limited human developments such as Unit 21(E), habitat is not considered a significant factor in limiting wolf populations, and it is presumed that numbers of wolves are limited mainly by prey availability; there is no evidence of disease or any other naturally occurring factors that would cause wolf mortality to be higher than normally expected;
  - (ii.) using the February 2009 moose population estimate and fall 2008 wolf population estimates, the moose-to-wolf ratio in Unit 21(E) is between 40:1 and 60:1;
  - (iii.) studies in Alaska and elsewhere have repeatedly concluded that large reductions are required to affect wolf population levels and to reduce predation by wolves on their prey; research indicates a reduction of about 60–80 percent of the pre-control wolf population may be necessary to achieve prey population objectives; once the wolf population has been reduced to the population control objective, annual reductions of less than 60 percent will likely regulate the wolf population at the control objective; the wolf population control objective will achieve the desired reduction in wolf predation, and also ensure that wolves persist within the predation control area;
  - (iv.) the primary objective of the Unit 21(E) wolf predation control plan is to reduce wolf numbers and wolf predation on moose within the 2,617 square mile MMA to the lowest level possible if necessary; this plan also has a goal to maintain wolves as part of the ecosystem within Unit 21(E); the minimum wolf population objective for Unit 21(E) is 29–31 wolves, which represents a 80 percent reduction from the pre-control minimum estimated fall wolf population of 146–156 (18–20 wolves per 1000 square miles); a minimum 60 percent wolf reduction from precontrol levels

will achieve the minimum desired reduction in wolf predation, and a maximum 80 percent wolf reduction ensures that wolves persist in Unit 21(E);

- (v.) the wolf population is expected to decline somewhat if there is a decline in the moose population and reduced availability of prey; this decline could result in the moose and wolf populations in Unit 21(E) entering a low density dynamic equilibrium state in which both predator and prey numbers are likely to stay at low levels indefinitely; if wolf predation control efforts are implemented and the wolf population is reduced according to the wolf population and removal objectives, the wolf population will be maintained at a minimum of 29–31 wolves for several years, but once the moose population increases and wolf control efforts are suspended, research and case history indicate the wolf population will increase through a combination of wolf immigration and higher wolf reproductive rate in response to the increased prey base;

(E) the human use information for the predator population is as follows:

- (i.) average annual reported harvest of wolves by hunters and trappers during the 2003–2008 seasons was 17;
- (ii.) the human population in Unit 21(E) is concentrated along the lower Yukon and Innoko River corridors; the region’s weather is influenced by coastal conditions and warm spells in the winter will often melt snow and make travel and tracking conditions poor; in addition, the low price of wolf pelts and high cost of fuel make it difficult for local residents to harvest a high number of wolves throughout the unit;

(2) the predator and prey population levels and population objectives, and the basis for those objectives, is as follows:

- (A) the most recent (2009) estimate for the observable moose population in the Unit 21(E) predation control area is 6,205–8,747 moose; the intensive management population objective for Unit 21(E) is 9,000–11,000 moose; intensive management objectives were based on historic information about moose numbers, habitat limitations, sustainable harvest levels, and human use;
- (B) the pre-control estimated minimum wolf population in Unit 21(E) was 146–156 wolves in fall 2008; studies in Alaska and elsewhere have repeatedly concluded that large, annual reductions of wolves are required to diminish wolf population levels and predation by wolves on their prey; consistent with scientific studies and department experience, the objective of this plan is to substantially reduce wolf numbers from pre-control levels if necessary to relieve predation pressure on moose and allow for improved recruitment to the moose population; this plan also has as a goal to maintain wolves as part of the natural ecosystem within the described geographical area; to achieve the desired reduction in wolf predation, but ensure that wolves persist within the plan area, the wolf population in Unit 21(E) will be reduced to no fewer than 29 wolves;
- (C) the primary objective of the Unit 21(E) wolf predation control plan is to reduce wolf numbers and wolf predation on moose within the 2,617 square mile MMA if necessary to the lowest level possible; this plan also has a goal to maintain wolves as part of the

ecosystem within Unit 21(E); the minimum wolf population objective for Unit 21(E) is 29–31 wolves, which represents an 80 percent reduction from the pre-control minimum estimated fall wolf population of 146–156 (18–20 wolves per 1000 square miles); a minimum 60 percent wolf reduction from precontrol levels will achieve the minimum desired reduction in wolf predation, and a maximum 80 percent wolf reduction ensures that wolves persist in Unit 21(E);

(3) justifications for the predator control implementation plan are as follows:

- (A) the observable moose population size for Unit 21(E) was estimated at 6,205–8,747 in February 2009, with  $6218 \pm 17$  percent (1.2 moose per square mile) in the MSA; the harvestable surplus of moose is 248–350, based on a conservative harvest rate of 4 percent of the estimated moose population; if there were a decline below 1.0 observable moose per square mile the intensive management population objective of 9,000–11,000 and harvest objective of 550–1,100 may not be met; local residents and other hunters reported a decline in the moose population prior to 2000 and are concerned that additional declines may occur, making it increasingly difficult to achieve objectives; declines in the moose population occur because mortality exceeds recruitment into the population; wolf predation is an important cause of moose mortality; in Alaska and Canada where moose are the primary prey of wolves, studies documented kill rates ranging from four to seven moose per wolf per winter;
- (B) a proactive approach is needed to allow for a timely response to any additional decline in the Unit 21(E) moose population; reducing wolf numbers through a wolf predation control program, combined with reduction in moose harvest, is the approach most likely to succeed in a recovery of the moose population if an additional decline occurs; wolf harvest through hunting and trapping efforts has not resulted in lowering the wolf population sufficiently to allow the moose population to grow;
- (C) presently known alternatives to predator control for reducing the number of predators are ineffective, impractical, or uneconomical in the Unit 21(E) situation; hunting and trapping conducted under authority of ordinary hunting and trapping seasons and bag limits is not an effective reduction technique in sparsely populated areas such as Unit 21(E); the numbers of hunters and trappers are relatively low and educational programs to stimulate interest and improve skills in taking wolves have so far have been unsuccessful in increasing the harvest of wolves; the inherent wariness of wolves, difficult access, and relatively poor pelt prices also explain low harvest rates; application of the most common sterilization techniques, including surgery, implants, or inoculation, are not effective reduction techniques because they require immobilization of individual predators, which is extremely expensive in remote areas, relocation of wolves is impractical because it is expensive and it is very difficult to find publicly acceptable places for relocated wolves; habitat manipulation is ineffective because it may improve the birth rate of moose in certain circumstances, but it is poor survival, not poor birth rate that keeps moose populations low in rural areas of Interior Alaska; supplemental feeding of wolves and bears as an alternative to predator control has improved moose calf survival in two experiments; however, large numbers of moose carcasses are not available for this kind of effort and transporting them to remote areas of Alaska is not practical; stocking of moose is impractical because of capturing and

moving expenses; any of the alternatives to a wolf predation control program are not likely to be effective in achieving the desired level of predator harvest;

(D) moose hunting seasons and bag limits have been reduced in Unit 21(E); the February resident season for any moose was closed in 2003 and the nonresident season was shortened and made more restrictive in 2006; if additional declines in the moose population occur, these measures by themselves are unlikely to allow the moose population to increase;

(E) without an effective wolf predation control program, the wolf removal objective cannot be achieved; a timely response to any additional decline in the Unit 21(E) moose population will not be possible, resulting in the population potentially moving into the low density dynamic equilibrium state with little expectation of increase; data from moose mortality and predator-prey studies conducted throughout Alaska and similar areas in Canada suggest that reducing the number of wolves in Unit 21(E) can reasonably be expected to increase moose survival, particularly for yearlings; reducing wolf predation on moose, in combination with carefully managing harvest (including minimizing cow harvest), can reasonably be expected to initiate an increase of the moose population;

(4) the permissible methods and means used to take wolves are as follows:

(A) hunting and trapping of wolves by the public in Unit 21(E) during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles as provided in 5 AAC 92.080;

(B) the commissioner may issue public aerial shooting permits or public land and shoot permits in Unit 21(E) as a method of wolf removal under AS 16.05.783 when the mid point of any population estimate obtained in the MSA declines below 1.0 observable moose per square mile;

(5) the anticipated time frame and schedule for update and reevaluation are as follows:

(A) for up to six years beginning on July 1, 2010, the commissioner may reduce the wolf population in Unit 21(E);

(B) annually, the department shall to the extent practicable, provide to the board at the board's spring board meeting, a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan;

(6) other specifications the board considers necessary are as follows;

(A) the commissioner will suspend wolf predation control activities

(i.) when wolf inventories or accumulated information from wolf control permittees indicate the need to avoid reducing wolf numbers below the minimum population objective of 29–31 wolves in Unit 21(E) specified in this subsection;

(ii.) no later than April 30 in any regulatory year; or

(iii.) when prey population objectives are attained;

- (B) the commissioner will annually close wolf hunting and trapping seasons as appropriate to ensure that the minimum wolf population objective is not exceeded; or
- (C) wolf predation control activities will be terminated upon expiration of the period during which the commissioner is authorized to reduce predator numbers in the predation control plan area;

**ISSUE:** The Grayling–Anvik–Shageluk–Holy Cross (GASH) Advisory Committee (AC) has expressed concern for several years about declining moose numbers in Unit 21E. In January 2003 the GASH Advisory Committee recommended not reauthorizing the state antlerless winter moose hunt in Unit 21E due to their concerns about the declining moose population and to take proactive action to protect reproductive potential and ensure adequate moose survival.

In 2004, the department established the Yukon–Innoko Moose Management Working Group (YIWG) composed of GASH Advisory Committee members and other stakeholders in Unit 21E moose management to evaluate all available data on moose populations, harvest levels, habitat and predation and to develop recommendations to the department and board. The Advisory Committee also heard testimony of local residents and other hunters who reported a decline in the moose population in the unit. After reviewing all available information the YIWG unanimously recommended establishing a wolf predation control program for Unit 21E.

The Board of Game endorsed the Yukon–Innoko Moose Management Plan (YIMMP) in March 2006, authorized the taking of wolves by snowmachine, increased the hunting bag limit and lengthened the trapping season for wolves in Unit 21E. The board requested the department to proceed with preparing a draft intensive management plan and an accompanying predation control implementation plan (5 AAC 92.125) to be considered by the board at the next available opportunity. The department presented a preliminary “Adaptive Management Plan for Intensive Management of Moose in Game Management Unit 21E” to the board in February 2008, and will present a final adaptive plan to the board when it is available. Until the adaptive plan is available, the department is proposing this Unit 21E Predation Control Implementation Plan to guide predation control activities. This control plan recommends establishing a wolf predation control program and beginning implementation of the program if additional population surveys provide documentation of a decline in the moose population.

The YIMMP is intended to help rebuild the moose population in Unit 21E and includes recommendations involving moose harvest reductions, habitat management and predation control. The Federal Subsistence Board (FSB) has also endorsed the YIMMP, and if the department implements the wolf predation control program in Unit 21E, a proposal will be submitted to the FSB to close the cow portion of the federal antlerless moose hunting seasons in Unit 21E.

Providing increased opportunity for taking wolves under the hunting and trapping regulations has not proven to be effective in reducing wolf numbers enough to increase moose survival and promote growth of the moose population. The board has identified moose in Unit 21E as being important for providing high levels of moose for human consumptive purposes. If the moose population were to fall below 1.0 observable moose per square mile, the moose population and annual harvest estimates may be below the Intensive Management population and harvest objectives established by the board. Wolf predation control may be necessary in the future to

help rebuild the moose population in Unit 21E and to better provide for human consumptive uses of moose.

As a first priority for wolf predation control, the department recommends focusing on a 2,617 square mile moose management area surrounding the villages of Anvik, Shageluk, and Holy Cross. This area is important for providing moose for local subsistence hunters and has a reasonable likelihood of success. We recommend using techniques that are as efficient and effective as possible.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The YIMMP is intended as a proactive approach to managing the moose population for high levels of harvest according to the state Intensive Management law. If a wolf predation control program is not implemented, we would not have the tool in place to prevent the moose population from declining (if a decline is detected) to a low level from which it will be very difficult to recover. Regulatory proposals have previously been implemented by the board to reduce harvest of cow moose and place a limit on nonresident harvest in Unit 21E; however, harvest reductions alone are not expected to achieve significant increases in the moose population. If the moose population were to fall below 1.0 observable moose per square mile, further harvest reductions may be required including the possibility of restricting harvest to residents of Alaska only and allocating among Alaska resident subsistence hunters through Tier II permits.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** If predation by wolves on moose is reduced in Unit 21E, the moose population is likely to increase, resulting in greater moose harvests in the future.

**WHO IS LIKELY TO BENEFIT?** All hunters will likely benefit from an increase in the moose population.

**WHO IS LIKELY TO SUFFER?** Those who do not feel the current moose population is low enough to justify wolf predation control or who oppose wolf predation control on philosophical grounds will not agree with implementing wolf predation control.

**OTHER SOLUTIONS CONSIDERED?** This proposal is one component of a multifaceted program recommended by the YIWG. The entire program includes reductions in moose harvest, monitoring habitat conditions and promoting a natural fire regime, and encouraging an increase in the harvest of bears.

**PROPOSED BY:** Alaska Department of Fish and Game at the request of the Board of Game and the Yukon–Innoko Moose Management Working Group.

**LOG NUMBER:** HQ-10S-G-043

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

**PROPOSAL 85 - 5 AAC 92.125. Predation control areas implementation plans.** Amend the regulation to provide the following:

Adopt a wolf predation control plan for Unit 21E which can be implemented right away instead of waiting two more years for the Board of Game to meet after the intensive management plan has been drafted and adopted.

**ISSUE:** The Yukon Innoko Moose Management Plan was endorsed by the Board of Game in March 2006. Members of the Yukon Innoko Moose Management Working Group, which included several members of the Grayling, Anvik, Shageluk, Holy Cross Advisory Committee (GASH) and non-local hunters, unanimously recommended a wolf predation control program in Unit 21E to prevent further decline in the moose population and maintain harvest opportunities. There has already been a two year delay in implementing this recommendation. In the letter endorsing the plan, the board requested the department to develop an intensive management plan to be considered by the board at the next available opportunity. The department is preparing an intensive management plan to submit to the board at the upcoming meeting. GASH feels it is crucial that the board endorse the intensive management plan and adopt this proposed regulation to authorize a wolf predation control now before the moose population declines to a very low level that would be very difficult to recover from.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** So far there is no wolf predation control plan in place, and the moose populations will plummet even farther if we wait for the intensive management plan to be adopted by the Board of Game and then have to wait until the March 2010 meeting to adopt a regulation for a wolf predation control program.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The wolf population can be reduced now instead of waiting two or three more years. Reducing wolf predation will help to increase the moose population and maintain hunting opportunities for local and non-local hunters.

**WHO IS LIKELY TO BENEFIT?** Hunters in Unit 21E who want to see the moose populations begin to grow and continue to be able to harvest moose.

**WHO IS LIKELY TO SUFFER?** Persons from outside our area that does not like wolf control may not like the idea. We do not want to see wolves eliminated from the area and wolf numbers will come back up when there are more moose.

**OTHER SOLUTIONS CONSIDERED?** Wait until the entire intensive management plan has been adopted. We rejected this option because time is of the essence, and waiting 2 or 3 more years will cause moose populations to become even more reduced because of increased predation.

**PROPOSED BY:** Grayling-Anvik-Shageluk-Holy Cross (GASH) AC  
**LOG NUMBER:** I-08S-G-041

*Note: This proposal was deferred by the Board of Game from the Spring, 2009 meeting. It was previously listed as proposal 239. There is updated, proposed regulatory language provided by the Department of Fish and Game listed under Proposal 84.*

**PROPOSAL 86 – 5 AAC 92.125. Predation Control Areas Implementation Plans.** Establish a Unit 21E predation control implementation plan as follows, with a delayed effective date of July 1, 2010 and with implementation of wolf control activities only if the moose population declines below the current level. The Adaptive Plan for Intensive Management of Moose in Unit 21(E) that is referenced in the proposal will be available for review on the department’s web site in late January 2009.

...

(j) **Unit 21(E) predation control area:** The Unit 21(E) Predation Control Area is established encompassing approximately 7,995 square miles; this predator control program does not apply within National Wildlife Refuge Lands unless approved by the federal agencies; notwithstanding any other provision in this title, and based on information contained in the Adaptive Plan for Intensive Management of Moose in Unit 21(E) and on the following information contained in this section, the commissioner or the commissioner’s designee may conduct a wolf population reduction or wolf population regulation program in the Unit 21(E) Predation Control Area:

(7) the discussion of wildlife population and human use information is as follows:

(F) a Wolf Control Focus Zone is established within the Unit 21(E) Predation Control Area encompassing approximately 2,617 square miles surrounding the villages of Anvik, Shageluk, and Holy Cross, rather than over the entire game management unit; the Wolf Control Focus Zone concentrates control actions in a relatively small area around villages, rather than over the entire game management unit; the department will have the discretion to adjust the size and shape of the focus area where wolf predation control activities occur within the Unit 21(E) Predation Control Area;

(G) prey population information is as follows:

(xii.) local residents and other hunters have reported a decline in the Unit 21(E) moose population over the last several years and are concerned that additional declines may occur; however, there is little data available on the number of moose prior to 2000 for comparison; population estimates of 7,000–9,000 in 2000 and 2005 for Unit 21(E) indicated little change; moose density in the population estimation survey area in 2000 was 1.0 per square mile and in 2005 was 0.9 per square mile;

(xiii.) the intensive management moose population objective established by the board for Unit 21(E) is 9,000–11,000 moose;

(xiv.) the intensive management moose harvest objective established by the board for Unit 21(E) is 550–1,100 moose;

(xv.) composition surveys conducted during November 1987–1998 and 2007–2008 in the Holy Cross area indicated bull-to-cow ratios and the calf-to-cow ratios were at or above 25–30 bulls:100 cows and 30–40 calves:100 cows;

(xvi.) based on available data, habitat is probably not a factor limiting moose population growth in Unit 21(E); a browse survey conducted during spring 2006 found that

moose were removing about 20 percent of the biomass; twinning surveys conducted during spring 2000–2008 have shown an average twinning rate of 33 percent;

- (xvii.) total estimated mortality is likely high relative to the size of the moose population; information gained from studies on moose in Unit 19(D) East and other areas of Alaska, and observations by local residents suggests that wolves are currently a limiting factor for moose in Unit 21(E); research from Unit 19(D) East also indicates that black and brown bear predation is a factor that contributes to calf moose mortality, and bears may be limiting the moose population in Unit 21(E);
  - (xviii.) the harvestable surplus in Unit 21(E) is 280–360 moose based on a conservative harvest rate of 4 percent of the total estimated population;
  - (xix.) the upper end of the range of estimated moose population in Unit 21(E) is equal to the lower end of the range of the intensive management population objective; the number of animals that can be removed from the Unit 21(E) moose population on an annual basis without preventing growth of the population or altering the composition of the population in a biologically unacceptable manner is less than the harvest objective established for the population in 5AAC 92.108;
  - (xx.) the 2005 estimate of 0.9 moose per square mile within the Unit 21(E) population estimation survey area is considered to be near the upper end of the range of densities associated with low density dynamic equilibrium moose populations that are predator limited; a decline in moose numbers will result in the population moving further into the low density dynamic equilibrium state; without an effective wolf control program the moose in Unit 21(E) are likely to persist in this state with little expectation of increase; results from moose mortality studies, and predator and prey studies, conducted throughout Alaska and similar areas in Canada indicate that reducing the number of wolves in Unit 21(E) can reasonably be expected to increase the survival of yearling and older moose; wolf control activities within the Unit 21(E) Wolf Predation Control Focus Area can reasonably be expected to increase moose densities in that and surrounding areas and increase the number of moose that can be harvested;
- (H) human use information for the prey population is as follows:
- (i.) the board identified moose in Unit 21(E) as important for providing high levels of harvest for human consumptive use in accordance with AS 16.05.255(e)–(g);
  - (ii.) estimated average annual moose harvest by all Alaska resident hunters in Unit 21(E) was 311; this harvest was based on all available harvest data between 1996 and 2005, including harvest ticket reports, division of subsistence household surveys, and other subsistence research; the average nonresident harvest between 2000 and 2004 was 30 moose;
  - (iii.) according to harvest ticket reports, the number of moose harvested Unit 21(E) declined from an average of 182 annually during the 1998–2002 seasons to 127 during the 2003–2007 seasons; most of this decline can be attributed to a decrease in non-local harvest;
  - (iv.) in a March 2002 report to the board, the division of subsistence estimated the average annual harvest of moose by residents of Unit 21(E) during 1996–1999

seasons was 226; division of subsistence household surveys indicated harvest by residents of Unit 21(E) during 2002, 2003, and 2004 seasons was 133, 118, and 94 respectively; harvest was unusually low in 2004–2005 due to low water and to forest fires that burned from summer until the fall moose hunting season;

- (v.) the amount necessary for subsistence established by the board for Unit 21 is 600–800 moose;
  - (vi.) the intensive management harvest objective is 550–1,100, as the moose population increases and more harvest can be allowed, a greater portion of the unmet demand for moose in Unit 21(E) can be satisfied; based on management experience gained in the Unit 19(D) East and other areas of Alaska, an increase in the moose population is expected if the wolf population is reduced substantially; a reduction in the number of wolves would result in a higher rate of increase in the number of moose available for harvest; although the most pronounced effect is expected to be within the Wolf Control Focus Zone, it is reasonable to expect some lesser degree of increase in the moose population in the area immediately surrounding the focus area because of a reduction in wolf predation; without a wolf predation control program there is a very low probability that a further decline in the moose population could be prevented and recovery initiated to meet local subsistence needs or other harvest demands;
- (I) predator population information is as follows:
- (i.) the pre-control wolf population in Unit 21(E) was estimated in fall 2005 using an extrapolation technique combined with sealing record and anecdotal observations; the population in the entire 7,995 square mile area was estimated at 180–240 wolves or approximately 23–30 wolves per 1000 square miles; in areas with limited human developments, habitat is not considered a significant factor in limiting wolf populations and it is presumed that numbers of wolves are limited mainly by prey availability; there is no evidence of disease or any other naturally occurring factors that would cause wolf mortality to be higher than normally expected;
  - (ii.) using the 2005 moose and wolf population estimates, the moose to wolf ratio in Unit 21(E) is between 29:1 and 50:1;
  - (iii.) studies in Alaska and elsewhere have repeatedly concluded that large reductions are required to affect wolf population levels and to reduce predation by wolves on their prey; research indicates a reduction of about 60–80 percent of the pre-control wolf population may be necessary to achieve prey population objectives; once the wolf population has been reduced to the population control objective, annual reductions of less than 60 percent will likely regulate the wolf population at the control objective; the wolf population control objective will achieve the desired reduction in wolf predation, and also ensure that wolves persist within the plan area;
- (J) the human use information for the predator population is as follows:
- (i.) average annual reported harvest of wolves by hunters and trappers during the 2003–2007 seasons was 16;
  - (ii.) the human population in Unit 21(E) is concentrated along the lower Yukon River corridor; the lower Yukon region weather is influenced by coastal conditions and

often warm spells in the winter will melt snow and make travel and tracking conditions poor; in addition, the low price of wolf pelts and cost of fuel make it difficult for local residents to harvest a high number of wolves throughout the unit;

(8) the predator and prey population levels and population objectives, and the basis for those objectives, is as follows:

- (A) the most recent estimate for the moose population in the Unit 21(E) predation control area is 7,000–9,000 moose; the intensive management population objective for Unit 21(E) is 9,000–11,000 moose; intensive management objectives were based on historic information about moose numbers, habitat limitations, sustainable harvest levels, and human use;
- (B) the pre-control estimated minimum wolf population in Unit 21(E) was 180–240 wolves in fall 2005; the primary objective of the Unit 21(E) wolf predation control plan is to reduce wolf numbers and wolf predation on moose within the 2,617 square mile Wolf Control Focus Zone to the lowest level possible; this plan also has a goal to maintain wolves as part of the ecosystem within Unit 21(E); the minimum wolf population objective for Unit 21(E) is 40 wolves, which represents a 60–80 percent reduction from the pre-control minimum estimated fall wolf population of 180 wolves (23 wolves per 1,000 square miles); the minimum wolf population control objective will achieve the desired reduction in wolf predation, and also ensure that wolves persist within the plan area;

(9) justifications for the predator control implementation plan are as follows:

- (A) the moose population size for Unit 21(E) was estimated at 7,000–9,000 in February 2005, with a density of 0.9 moose per square mile in the population estimation survey area; the harvestable surplus of moose is 280–360, based on a conservative harvest rate of 4 percent of the estimated moose population; the intensive management population objective of 9,000–11,000 and harvest objective of 550–1,100 have not been met; local residents and other hunters reported a decline in the moose population prior to 2000 and are concerned that additional declines may occur, making it increasingly difficult to achieve objectives; declines in the moose population occur because mortality exceeds recruitment into the population; wolf predation is an important cause of moose mortality; in Alaska and Canada where moose are the primary prey of wolves, studies documented kill rates ranging from four to seven moose per wolf per winter;
- (B) a proactive approach is needed to allow for a timely response to any additional decline in the Unit 21(E) moose population; reducing wolf numbers through a wolf predation control program, combined with reduction in moose harvest, is the approach most likely to succeed in a recovery of the moose population if an additional decline occurs; wolf harvest through hunting and trapping efforts has not resulted in lowering the wolf population sufficiently to allow the moose population to grow;
- (C) presently known alternatives to predator control for reducing the number of predators are ineffective, impractical, or uneconomical in the Unit 21(E) situation;
- (D) moose hunting seasons and bag limits have been reduced in Unit 21(E); the February resident season for any moose was closed in 2003 and the nonresident season was shortened and made more restrictive in 2006; while helpful, these measures alone will

not likely stop additional declines in the moose population, and they will not be enough alone to allow the moose population to increase;

- (E) without an effective wolf predation control program, the wolf harvest objective cannot be achieved; a timely response to any additional decline in the Unit 21(E) moose population will not be possible, resulting in the population moving further into the low density dynamic equilibrium state with little expectation of increase; data from moose mortality and predator–prey studies conducted throughout Alaska and similar areas in Canada suggest that reducing the number of wolves in Unit 21(E) can reasonably be expected to increase moose survival, particularly for yearlings; reducing wolf predation on moose, in combination with carefully managing harvest (including minimizing cow harvest), can reasonably be expected to initiate an increase of the moose population;
- (10) the permissible methods and means used to take wolves are as follows:
- (A) hunting and trapping of wolves by the public in Unit 21(E) during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including use of motorized vehicles as provided in 5 AAC 92.080;
  - (B) the commissioner may issue public aerial shooting permits or public land and shoot permits in Unit 21(E) as a method of wolf removal under AS 16.05.783 when the mid point of any density estimate obtained in any moose population estimation survey area declines below 0.9 moose per square mile;
- (11) the anticipated time frame and schedule for update and reevaluation are as follows:
- (A) for up to five years beginning on July 1, 2010, the commissioner may reduce the wolf population in Unit 21(E);
  - (B) annually, the department shall to the extent practicable, provide to the board at the board's spring board meeting, a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose and wolf populations, and recommendations for changes, if necessary, to achieve the objectives of the plan;
- (12) other specifications the board considers necessary are as follows:
- (A) the commissioner will suspend wolf control activities
    - (i.) when wolf inventories or accumulated information from wolf control permittees indicate the need to avoid reducing wolf numbers below the management objective of 40 wolves in Unit 21(E) specified in this subsection;
    - (ii.) when spring conditions deteriorate to make wolf control operations infeasible; or
    - (iii.) no later than April 30 in any regulatory year;
  - (B) wolf control activities will be terminated
    - (i.) when prey population management objectives are attained; or
    - (ii.) upon expiration of the period during which the commissioner is authorized to reduce predator numbers in the predator control plan area; or

- (C) the commissioner will annually close wolf hunting and trapping seasons as appropriate to ensure that the minimum wolf population objective is met.

**ISSUE:** The Grayling–Anvik–Shageluk–Holy Cross (GASH) Advisory Committee (AC) has expressed concern for several years about declining moose numbers in Unit 21E. In January 2003 the GASH AC recommended not reauthorizing the state antlerless winter moose hunt in Unit 21E due to their concerns about the declining moose population and to take proactive action to protect the reproductive potential of the population.

In 2004, the Department established the Yukon–Innoko Moose Management Working Group (YIWG) composed of GASH AC members and other stakeholders in Unit 21E moose management to evaluate all available data on moose populations, harvest levels, habitat and predation and to develop recommendations to the department and board. The AC also heard testimony of local residents and other hunters who reported a decline in the moose population in the area. After reviewing all available information the YIWG unanimously recommended establishing a wolf predation control program for Unit 21E.

The Board of Game endorsed the Yukon–Innoko Moose Management Plan (YIMMP) in March 2006, authorized the taking of wolves by snowmachine, increased the hunting bag limit and lengthened the trapping season for wolves in Unit 21E. The board requested the department to proceed with preparing a draft Intensive Management Plan to be considered by the board at the next available opportunity. The department presented a preliminary “Adaptive Management Plan for Intensive Management of Moose in Game Management Unit 21E” to the board in February 2008, and will present a final plan to the board in March 2009. This plan recommended establishing a wolf predation control program in Unit 21E and beginning implementation of the program if an additional population surveys provide further documentation of a decline in the moose population. A copy of the plan will be available for public review on the department's web site in late January 2009.

The YIMMP is intended to help rebuild the moose population in Unit 21E and includes recommendations involving moose harvest reductions, habitat management and predation control. The Federal Subsistence Board (FSB) has also endorsed the YIMMP and if the department implements the wolf predation control program in Unit 21E a proposal will be submitted to the FSB to close the federal antlerless moose hunting seasons in Unit 21E.

Providing increased opportunity for taking wolves under the hunting and trapping regulations has not proven to be effective in reducing wolf numbers enough to increase moose calf and adult survival and promote growth of the moose population. The board has identified moose in Unit 21E as being important for providing high levels of moose for human consumptive purposes. The current moose population and annual harvest estimates are below the Intensive Management population and harvest objectives established by the board. Wolf predation control is necessary to help rebuild the moose population in Unit 21E and to better provide for human consumptive uses of moose.

As a first priority for wolf predation control the Department recommends focusing on a 2,617 square mile Wolf Control Focus Zone surrounding the villages of Anvik, Shageluk, and Holy Cross. This area is important for providing moose for local subsistence hunters and has a

reasonable likelihood of success. We recommend using techniques that are as efficient and effective as possible.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The YIMMP is intended as a proactive approach to managing the moose population for high levels of harvest according to the state Intensive Management law. If a wolf predation control program is not implemented, the moose population may decline to a very low level from which it will be very difficult to recover. Regulatory proposals have previously been implemented by the board to reduce harvest of cow moose and place a limit on non-resident harvest in Unit 21E; however, harvest reductions alone are not expected to achieve significant increases in the moose population. If the moose population declines further, further harvest reductions will be required including the possibility of restricting harvest to residents of Alaska only and allocating among Alaska resident subsistence hunters through Tier II permits.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** If predation by wolves on moose is reduced in Unit 21E, the moose population may increase, resulting in greater moose harvests in the future.

**WHO IS LIKELY TO BENEFIT?** All hunters will likely benefit from an increase in the moose population.

**WHO IS LIKELY TO SUFFER?** Those who do not feel the current moose population is low enough to justify wolf predation control or who oppose wolf predation control on philosophical grounds will not agree with implementing wolf predation control.

**OTHER SOLUTIONS CONSIDERED?** This proposal is one component of a multifaceted program recommended by the YIWG. The entire program includes reductions in moose harvest, monitoring habitat conditions and promoting a natural fire regime, and increasing harvest of bears.

**PROPOSED BY:** Alaska Department of Fish and Game at the request of the Board of Game and the Yukon–Innoko Moose Management Working Group

**LOG NUMBER:** HQ-10S-G-008

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**PROPOSAL 87 - 5 AAC 92.540. Controlled use areas.** Modify the aircraft restrictions for the Koyukuk Controlled Use Area as follows:

In the current regulation pertaining to the KNWR Controlled Use Area it states "The area is closed to the use of aircraft for hunting moose, including transportation of any moose hunters, their hunting gear, and/or moose parts;" and one of the following options:

Option One. "this includes landing in the field adjacent to the KNWR CUA and using a different mode of transportation to access the KNWR CUA"

Option Two. "A moose harvested in the KNWR CUA by a hunter accessing the adjacent area by aircraft, may not be transported out of the field by aircraft."

**ISSUE:** The Controlled Use Area (CUA) of the Koyukuk National Wildlife Refuge (KNWR) is the oldest CUA in the State. It was established to protect the moose population for ground based and local subsistence hunters and to promote 'fair chase'. The intent of the CUA is being violated by hunters and guide operators who fly hunters into camps on the perimeter of the CUA. These hunters then use boats, etc to harvest their animal within the boundaries of the CUA, and to transport their animal to their camp outside the area where the animal is then flown from the field. The Board of Game needs to close this 'loophole' in the regulation.

The provision of allowing aircraft to fly over the CUA is essentially unenforceable. Pilots routinely flying over the area to deliver hunters to the 'perimeter' camps can easily spot moose populations and discern their migration patterns. These pilots spot moose for their clients by flying grids and circles over the area. Over time, these operators know where to locate the 'perimeter' camps so that their clients will be able to easily harvest their animals.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The intent and purpose of the CUA designation will continue to be circumvented. Guides and transporters will continue to use aircraft to spot moose and compete with both subsistence and recreational ground based hunters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes. The meat from moose take by fly- in drop off hunters, must stay in the field until the aircraft picks it up. The weather has been very warm the past several years. This proposal eliminated meat spoilage caused by delays in transporting the meat in a timely manner due to aircraft scheduling.

**WHO IS LIKELY TO BENEFIT?** 1. Resident hunters who are primarily subsistence hunters. 2. Land based hunters who are able to harvest an animal without the interference of aircraft overhead. 3. Professional guide personnel who live in the KNWR villages of Huslia and Hughes and earn income from conducting commercial guiding operations. 4. KNWR village residents who are the recipients of a substantial amount of meat from the commercial hunts conducted by professional village guide personnel.

**WHO IS LIKELY TO SUFFER?** Guides and transporter who use aircraft.

**OTHER SOLUTIONS CONSIDERED?** Prohibiting the use of aircraft for hunting in the KNWR and surrounding wilderness. Rejected this notice because I did not think that it would be approved.

**PROPOSED BY:** Virgil L. Umphenour

**LOG NUMBER:** I-10S-G-011

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**GALENA AREA – UNITS 21B, 21C, 24B, 24C, & 24D**

**PROPOSAL 88 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the moose hunt area boundary in Unit 21B as follows:

That portion within the Nowitna River drainage upstream from the Little Mud River drainage and downstream from the Susulanta River drainage, and outside a corridor extending two miles on either side of, and including, the Nowitna River.

**ISSUE:** The Nowitna is now drawing for moose. It is only a corridor within two miles of the river. This makes the small rivers such as the Susulatna not in the draw but open to a regular harvest ticket hunt. I propose to take the Nowitna above the mouth of the Susulatna out of the draw and make it a regular harvest ticket hunt. The Nowitna this far up is not accessible and is no bigger than the Susulatna it self. I only take two guided hunters a year to my cabin five miles above the mouth of the Susulatna on the Nowitna and if they do not draw I do not hunt the area that year. The draw is set up so there are permits set aside for guided only hunts and when any two hunters do end up drawing it takes two permits away from the guide who has the refuge permit which is not fair to him since the permits issued to be used on the refuge and I can not hunt on the refuge anyway.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** When my two hunters draw I will be taking the permits away from the guide who has the refuge which is unfair to him since his refuge permit is based on taking a certain amount of hunters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, now the few cabin owners above the refuge that do not draw a permit must destroy the antlers. If this were not a draw area they would kill more mature bulls.

**WHO IS LIKELY TO BENEFIT?** The guide who has the Nowitna Wildlife Refuge, his clients, my two clients and the few cabin owners above the refuge.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** The line for the draw could also be the boundary of the refuge. Everything above the refuge could be out of the draw.

**PROPOSED BY:** Stevan H. White

**LOG NUMBER:** HQ-10S-G-010

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**PROPOSAL 89 - 5 AAC 92.540. Controlled use areas.** Allows more flexibility to operate a check station and clarifies salvage requirements in the Koyukuk Controlled Use Area as follows:

...

(8) Units 21 and 24

(A) the Koyukuk Controlled Use Area:

...

(iii) all hunters on the Koyukuk River passing **a check station established by the department** [THE DEPARTMENT'S CHECK STATION AT ELLA'S CABIN (15 MILES UPSTREAM FROM THE YUKON ON THE KOYUKUK RIVER)] are required to stop at the check station and report to department personnel;

(iv) the meat of the hindquarters, forequarters, and ribs of any moose taken in the area must remain on the bone until the moose has been transported out of the area **or processed for human consumption; and the edible meat of the neck and back of any moose taken in the area under a subsistence registration permit must remain on the bone until the moose has been transported out of the area or processed for human consumption; and the head of a moose taken under a subsistence registration permit must be salvaged and processed for human consumption in the area or salvaged and transported from the area in a condition that allows for processing for human consumption;**

...

**ISSUE:** This proposal allows more flexibility for the department to operate a check station, and clarifies and strengthens regulatory authority to require subsistence hunters to salvage meat within the Koyukuk Controlled Use Area (CUA).

The department's hunter check station, previously operated at the native allotment site known as Ella's Cabin, had to be moved approximately ½ mile downstream. This proposal allows that change, as well as future changes as necessary. Department signage clearly identifies the new location, as it did at Ella's Cabin.

Using discretionary permit conditions (5 AAC 92.052), the department currently requires subsistence registration permit (RM832) hunters within the CUA to salvage the entire moose head and keep meat of the neck and backbone naturally attached to the bone until processed for human consumption. However, it is doubtful that discretionary permit conditions provide the department with the authority necessary for these requirements. Additionally, for hunters who live within the CUA, this proposal clarifies that moose may be processed for human consumption within the area.

The basis for these requirements stem from the customary and traditional salvaging practices of subsistence hunters in the Koyukuk River drainage who salvage the head for moose head soup and keep the meat of the neck and back attached to the bone to prevent spoilage.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The department will not have the flexibility needed to operate the CUA check station and some salvage requirements will be unclear and unenforceable.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, clear authority to specify permit hunt conditions will eliminate enforcement confusion.

**WHO IS LIKELY TO BENEFIT?** All hunters who are currently benefiting from the high harvest success rates and quality hunt characteristics that characterize the Koyukuk CUA.

**WHO IS LIKELY TO SUFFER?** Hunters who do not agree with salvage requirements.

**OTHER SOLUTIONS CONSIDERED?** Change wording in 5 AAC 92.052, 5 AAC92.220, or 5 AAC 92.990. No Change.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-044

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**PROPOSAL 90 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a winter moose hunt in the Kanuti Controlled Use Area as follows:

April 5 - 15 antlered bull moose hunt for the Kanuti Controlled Use Area downstream of the Henshaw Creek and including the Henshaw Creek drainage. The harvest quota of bulls will be determined after consultation with the State Area Biologist, Refuge Manager, BLM Central Yukon Field Office Manager, and the chairs of the Koyukuk River Advisory Committee and the Western Interior Alaska Subsistence Regional Advisory Council. The quota will be based on biological sustainability of the population maintaining the bull/cow ratio management objective. The harvest quota would apply to Federal and State concurrent hunts, if applicable. The Area Wildlife Biologist is authorized to close the season once the quota is reached.

**ISSUE:** Traditionally the Upper Koyukuk River in Unit 24B had a winter moose hunt which gave harvest opportunity to unsuccessful fall hunters another chance to harvest a moose and it provided a fresh meat source to the communities when the fall harvested moose and cached fish were running low. When the State winter season was eliminated it was for the conservation of cow moose and other reasons. Since that time Allakaket and Alatna villages have had harvests averaging around 25 percent of what is necessary. Radio collared moose show that moose are far away from the river corridors during the fall and December hunts. A "to be announced bull season" during early March has been suggested and may work if all the hunters were able to identify a bull moose in the field in early March. Having a winter antlered bull hunt in April would better accommodate subsistence users in need of meat in late winter. By early April, bull moose are starting to show the first signs of soft velvet antler growth, thus alleviating the identification problem with the early March hunt of readily distinguishing bulls from cows. The

new growth is typically 2 - 10 inches in length and is easily distinguished. increased light conditions also aid in better identification and provide more hours of harvest opportunity.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Local subsistence needs would continue to be unmet, forcing some families to poach a moose to meet their needs. They will take the first moose they encountered which may be a cow moose. The surplus bull moose available would go unharvested and moose population will remain low and possibly decline because of illegal cow moose harvest. The lands closest to the villages are State managed, and most economically accessed. Without a State winter hunt, there will remain a patchwork of Federal - State hunt areas that may result in unnecessary State law enforcement actions on legal Federal hunts. The patch work of hunts also may result in local hunters breaking State regulations because of the challenge to know where the jurisdictional boundaries are. The current patch work also results in higher fuel costs for local hunters who have to travel farther to hunt the Federal winter season, burning more fuel and passing up on winter hunting opportunities on closer village and regional Native corporation lands.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Limiting the allowable harvest for this winter hunt to bull moose when antlers can be present provides reasonable protection from accidental harvest of a cow moose. With this protection local subsistence needs are more likely to be met reducing the need to illegally taking a cow moose.

**WHO IS LIKELY TO BENEFIT?** Everyone will benefit from the increased hunting opportunity while at the same time providing protection against accidentally harvesting a cow moose.

**WHO IS LIKELY TO SUFFER?** None.

**OTHER SOLUTIONS CONSIDERED?**

**PROPOSED BY:** Western Interior Alaska Subsistence Regional Advisory Council

**LOG NUMBER:** I-10S-G-003

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**PROPOSAL 91 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a winter moose hunt in the Koyukuk Controlled Use Area as follows:

April 5 - 15 antlered bull moose hunt for the Koyukuk Controlled Use Area with the harvest quota of bulls will be determined after consultation with the State Area Biologist, Refuge Manager, BLM Central Yukon Field Office Manager and the chairs of the Western Interior Alaska Subsistence Regional Advisory Council. The quota will be based on biological sustainability of the population maintaining the bull/cow ratio management objective. The harvest quota would apply to Federal and State concurrent hunts if applicable. The Area Wildlife Biologist is authorized to close the season once the quota is reached.

**ISSUE:** The communities of Huslia and Hughes in Units 24C and 24D have a long tradition harvesting a late winter moose. A winter moose hunt gave the unsuccessful fall hunters another chance to harvest a moose and it provided a fresh meat source to the communities when the fall harvested moose and cached fish were running low. When the State late winter season was eliminated it was for the conservation of cow moose and other reasons. Winter moose movements show that most moose are far away from the river corridors during the fall and December hunts. A "to be announced bull season" during early March has been suggested and may work if all the hunters were able to identify a bull moose in the field in early March. Having a winter antlered bull hunt in April would better accommodate subsistence users in need of meat in late winter. By early April, bull moose are starting to show the first signs of soft velvet antler growth, thus alleviating the identification problem with the early March hunt of readily distinguishing bulls from cows. The new growth is typically two (2) - ten (10) inches in length and is easily distinguished. Increased light conditions also aid in better identification and provide more hours of harvest opportunity.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Local subsistence needs would continue to unmet, forcing some families to poach a moose to meet their needs. They will take the first moose they encountered which may be a cow moose. The surplus bull moose available will go unharvested and the moose population will not grow because of illegal cow moose harvest. The lands closest to the villages are State managed, and most economically accessed. Without a State late winter hunt, there will remain a patchwork of Federal - State hunt areas that may result in unnecessary State law enforcement actions on a legal late winter Federal hunt. The patch work of hunts also may result in local hunters breaking State regulations because of the challenge to know where the jurisdictional boundaries are in the field. The current patch work also results in higher fuel costs for local hunters who have to travel farther to hunt the Federal winter season, burning more fuel and passing winter hunting opportunities that are closer on village and regional Native corporation lands

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Limiting the allowable harvest for this winter hunt to bull moose when antlers can be present provides reasonable protection from accidental harvest of a cow moose. With this protection local subsistence needs are more likely to be met, reducing the need of possibly taking an illegal cow moose.

**WHO IS LIKELY TO BENEFIT?** Everyone will benefit from the increased hunting opportunity while at same time providing protection against accidentally, unintentional harvesting of a cow moose

**WHO IS LIKELY TO SUFFER?** None

**OTHER SOLUTIONS CONSIDERED?** The dates may be set slightly earlier March 21 - 31, or April 1 - 10. But rejected, as bulls are best - identified 2 - 3 weeks after the vernal equinox.

**PROPOSED BY:** Western Interior Alaska Subsistence Regional Advisory Council

**LOG NUMBER:** I-10S-G-004

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**PROPOSAL 92 - 5 AAC 92.011. Taking of game by proxy.** Clarifies and fully implements proxy restrictions in Units 21B, 21C, 21D, and 24 as follows:

...

(1) Notwithstanding (k) of this section, proxy hunting is prohibited in the following hunts where the board has determined that the use of the proxy would allow circumvention of harvest restrictions specified by the board:

...

(2) Units **21(B), 21(C), 21(D)**, and 24 moose [REGISTRATION] hunts if either the proxy or the beneficiary holds a drawing permit for **Units 21(B), 21(C), 21(D), or 24 moose hunts** [THE GALENA AREA];

....

**ISSUE:** Current proxy hunt prohibitions in the Galena management area are confusing for the public, have not been fully effective in preventing use of proxy to circumvent permit hunt restrictions, and apply to a larger geographic area than originally intended.

Registration permit hunts for bull moose in the Galena area are subsistence hunts only, are available to an unlimited number of hunters, and require destruction of antler trophy value. Drawing permit hunts for bulls are not subsistence hunts, are issued to a limited number of hunters, and do not require trophy destruction. The existing proxy regulation was implemented to prevent proxy hunters from circumventing the intent of either the registration or drawing permit hunts by reporting a harvested moose as taken under one hunt or the other, depending upon which was most advantageous to the hunter. For example, a hunter with a registration permit and a proxy drawing permit could shoot 2 moose, destroy the trophy value of the smaller moose, and report the smaller moose as harvested under the registration permit. The current regulation prevents this practice. However, the current regulation wording is frequently misinterpreted by the public to mean that proxy hunting is not allowed for the registration hunts under any circumstances. Also it does not prevent a drawing hunt recipient from proxy hunting for beneficiary that also has received a drawing hunt. Also, the current regulation applies to Units 21A and 21E, outside the Galena management area, where it is not needed. The proposed changes clarify the regulation, fully implement the intent, and limit its application to the Galena area only.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunters will continue to be confused and proxy restrictions will not be fully implemented in the Galena management area.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, the intent of the regulation will be achieved.

**WHO IS LIKELY TO BENEFIT?** Everyone.

**WHO IS LIKELY TO SUFFER?** Persons who want to proxy hunt a drawing permit.

**OTHER SOLUTIONS CONSIDERED?** Change wording in the Drawing Hunt Supplement or Hunting Regulations handbooks.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-046

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**PROPOSAL 93 - 5 AAC 92.108. Identified big game prey populations and objectives.** Change Intensive Management Objectives for Unit 21B as follows:

<b>Population</b>	<b>Finding</b>	<b>Population Objective</b>	<b>Harvest Objective</b>
....			
<b>Moose</b>			
....			
<b><u>GMU 21B</u></b>	<b><u>Positive</u></b>	<b><u>4,000-6,000</u></b>	<b><u>200-300</u></b>
[GMU 21B]	[NEGATIVE]		
....			

**ISSUE:** The Board adopted changes to the Unit 21B boundary in 2006. The new boundaries increased the size of the unit from 4,871 mi<sup>2</sup> to 9,311 mi<sup>2</sup>. With this increase, an adjustment of the population estimate and harvest estimate for the larger area indicates the unit should be given a positive finding for intensive management. The proposed objectives take into account the habitat within the new boundary, as well as recent surveys that have improved our knowledge about this moose population.

The Unit 21B moose population below the Little Mud River apparently declined in the late 1980s and early 1990s, but appears to have stabilized since that time. Moose population estimates for the 4,781-mi<sup>2</sup> area in 2001 and the 9,311-mi<sup>2</sup> area in 2008 are similar, and the precision of the 2008 estimate is higher. The Nowitna River Drainage above the Little Mud River is poor moose habitat (with approximately 0.2 moose/mi<sup>2</sup>), and therefore contributed little to the overall population estimate when Unit 21B was expanded to include this area.

Hunter participation declined prior to 2008 due to declining success rates, so that recent harvest data belies the potential demand for hunting opportunity in this Unit. During regulatory years

(RY) 1999–2008 (RY begins July 1 and ends June 30, e.g. RY99 begins July 1, 1999 and ends June 30, 2000) an average of 180 resident hunters reported hunting in the current Unit 21B area, and many local hunters from Tanana and Ruby state that they must travel into adjacent Units 20F and 21D in order to meet subsistence needs and avoid hunter concentrations.

	Area Size	Estimated Harvest <sup>1</sup>	Moose	Moose Population Estimate <sup>2</sup>
Values prior to boundary change	4,781 mi <sup>2</sup>	80 moose (avg. RY93–RY02)		1828–4494 <sup>3</sup>
Current values	9,311 mi <sup>2</sup>	99 moose (avg. RY99–RY08)		1898–2736 <sup>4</sup>

<sup>1</sup>Reported harvest and estimated unreported harvest

<sup>2</sup>Without sightability correction factor

<sup>3</sup>Based on a Geospatial Population Estimation survey in 2001 (90 percent CI = 42.2 percent)

<sup>4</sup>Based on a Geospatial Population Estimation survey in 2008 (90 percent CI = 18.1 percent)

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The moose population in Unit 21B will not be designated for intensive management.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes, the moose populations in Unit 21B will potentially be managed more intensively.

**WHO IS LIKELY TO BENEFIT?** Hunters who want to see a scientifically based response to changes in the moose population.

**WHO IS LIKELY TO SUFFER?** People who do not want to see intensive management objectives in Unit 21B may suffer.

**OTHER SOLUTIONS CONSIDERED?** 1) No change, 2) Higher population and harvest objectives

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-045

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**PROPOSAL 94 - 5 AAC 92.540 (8)(B). Controlled use areas.** Modify the boundary of Kanuti Controlled Use Area in Unit 24B as follows:

Move the boundary of the Kanuti Controlled Use Area so that it includes Fish Creek Lake as the northeast point instead of the Bettles VOR. The proposed regulation would read:

The Kanuti Controlled Use Area – the area consists of that portion of Unit 24 **bounded by a line from a point at the northern most headwaters of Siruk Creek at 66° 48.557' N. lat. 153° 53.267' W. long., to the highest peak of Double Point Mountain at 66° 40.322' N. lat. 152° 30.132' W. long., to the northern end of Fish Creek Lake (including all waters of the lake)**

**at 66° 36.071' N. lat. 151° 27.936' W. long., to the east side of Old Dummy Lake (including all waters of the lake) at 66° 08.241' N. lat. 151° 49.276' W. long., to the south end of Lake Todatonten (including all waters of the lake) at 66° 07.556' N. lat. 152° 55.520' W. long., then back to the point of origination at Siruk Creek.**

**ISSUE:** The Maness family owns a cabin on private land one mile in the Kanuti Controlled Use Area. We are unable to fly to our cabin during the moose season and are unable to eat moose at the cabin year round with the current regulations. It is an extreme hardship because we need to fly to and from our cabin during the hunting season - some years the river freezes up early to where the only transportation in or out by plane. The federal fish & wildlife agency disagrees with the state hunting regulations pertaining to this area and causes us a lot of grief and harassment. A solution for this problem is to move the boundary line to get our cabin out of the Controlled Use Area. We have had this cabin for twenty (20) years and it is on a six mile block of posted private land. Most of this area is posted private village or Doyon land. We spend months at this cabin and really need to solve this problem.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If this problem is not solved we will be continually harassed by the federal fish and wildlife agency and they could take our plane. We could never have moose meat at our cabin even if the meat was taken outside of the Controlled Use Area.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** No/

**WHO IS LIKELY TO BENEFIT?** Al and Betty Maness.

**WHO IS LIKELY TO SUFFER?** None - It is all posted private land - no hunting except by shareholders.

**OTHER SOLUTIONS CONSIDERED?** There are no other solutions.

**PROPOSED BY:** Al and Betty Maness

**LOG NUMBER:** HQ-10S-G-001

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**NORTHEAST ALASKA AREA – UNITS 25A, 25B, 25D, 26B, & 26C**

**PROPOSAL 95 - 5 AAC 84.270. Furbearer trapping.** Reduce the bag limit for beaver trapping in Unit 25 as follows:

<b>Species and Units</b>	<b>Open Season</b>	<b>Bag limit</b>
(1) Beaver		
.....		
Units 19, 21, 24 and <u>25C</u> [25]	September 1 - June 10	No limit
<b><u>Unit 25A, 25B and 25D</u></b>	<b><u>September 1 - June 10</u></b>	<b><u>50 per season</u></b>

**ISSUE:** In Units 25A, 25B and 25D, we would like to limit the annual take of beavers to fifty 50 beavers. Currently the bag limit is no limit.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Beavers could be overharvested. Traditionally, we set limits to the number of animals that can be harvested.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Everyone. There will be beaver available for future generations.

**WHO IS LIKELY TO SUFFER?** People who want to harvest more than 50 fifty beaver annually. However, we do not know of anyone who wants to do that.

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Yukon Flats Advisory Committee

**LOG NUMBER:** I-10S-G-013

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**PROPOSAL 96 - 5 AAC 84.270 (7) Furbearer trapping.** Extend the end date of the mink and weasel season in Units 26B and 26C as follows:

<b>Units and Bag Limits</b>	<b>Open Season</b>	<b>Bag limit</b>
...		
(7) Mink and weasel		
...		
Units 26(B) and 26(C)	<b><u>Nov. 1–Apr. 15</u></b> [NOV. 1–JAN. 31]	<b><u>No limit</u></b>

**ISSUE:** Extending the furbearer trapping season for mink and weasel in Unit 26B and 26C from January 31 to April 15 will make this season consistent with the majority of trapping seasons in Unit 26. Currently, coyote, fox (arctic and red), river otter, lynx, marten, and wolverine have trapping seasons that end on April 15 in Unit 26. A companion proposal to extend the mink and weasel season to April 15 in Unit 26A was adopted by the board at the Region V Board of Game meeting in November 2009.

We have no sealing information for mink or weasels in Units 26B and 26C, but we believe mink are rarely trapped in these units and weasels are trapped in small numbers. Weasels are often considered nuisance animals in North Slope villages because they eat and urinate on meat supplies. Some trappers help their neighbors by trapping and utilizing problem weasels. It would be beneficial if these trappers could continue to trap legally until April 15.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Units 26B and 26C trappers who want to harvest mink and weasels will have shorter seasons than necessary.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Trappers who want to catch mink and weasels during February 1–April 15 and village residents who want to have problem weasels removed during that time. Legal retention of mink and weasels caught incidentally during other open furbearer trapping seasons will result.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** Leave the regulations as they are. This would unnecessarily restrict trappers and make it more difficult to remove problem weasels.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-049

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**PROPOSAL 97 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions.** Allow black bear snaring in Unit 25D during open seasons as follows:

The following methods and means of taking big game are prohibited in addition to the prohibition in 5AAC 92.080,

(1)...

(6) with the use of a trap or snare; **except black bears in Unit 25D may be taken with a snare.**

**ISSUE:** We would like to be able to snare black bears in Unit 25D whenever the season is open.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Our customary and traditional ways will

be lost for no reason. There are a lot of black bears in the Yukon Flats and few bears are harvested annually.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** People who live in Unit 25D whose relatives and ancestors have snared black bears for generations. they can reclaim something they had been doing traditionally.

**WHO IS LIKELY TO SUFFER?** People who do not like bears to be snared.

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Yukon Flats Advisory Committee

**LOG NUMBER:** I-10S-G-12

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**PROPOSAL 98 - 5 AAC 92.260. Taking cub bears and female bears with cubs prohibited.**  
Allow the harvest of any black bear in Unit 25D as follows:

A person may not take a cub bear or a female bear accompanied by a cub bear, except that a black bear cub or a female black bear accompanied by a cub bear may be taken by a resident hunter from October 15 through April 30 under customary and traditional use activities at a den site in...**and 24 [, AND 25D] and in Unit 25D a person may take a cub bear or a female bear accompanied by a cub bear from July 1 - November 30 and March 1 - June 30.**

**ISSUE:** We would like to be able to harvest any black bear in Unit 25D whenever the season is open.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Our customary and traditional ways will be lost for no reason. There are a lot of black bears in the Yukon Flats and few bears are harvested annually.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** People who live in Unit 25D whose relatives and ancestors have taken any bear for generations. They can reclaim something they had been doing traditionally.

**WHO IS LIKELY TO SUFFER?** People who do not like sows and sows with cubs to be harvested.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Yukon Flats Advisory Committee

**LOG NUMBER:** I-10S-G-014

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**PROPOSAL 99 - 5AAC 85.025. Hunting seasons and bag limits for caribou.** Shorten the nonresident season for Porcupine Herd caribou in Unit 25B, Unit 25D, Unit 26C, and a portion of Unit 25A and reduce the nonresident bag limit from five caribou to one bull

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(20)

**Units [UNIT] 25(A), those portions east of the east bank of the East Fork Chandalar River extending from its confluence with the Chandalar River upstream to Guilbeau Pass, 25(B), and the remainder of 25(D)**

RESIDENT HUNTERS:  
10 caribou

July 1–Apr. 30

NONRESIDENT HUNTERS:  
**1 bull**  
[5 CARIBOU]

**Aug. 1–Sept. 30**  
[JULY 1–APR. 30]

**Unit 25(A), remainder**

**RESIDENT HUNTERS:**  
**10 caribou**

**July 1–Apr. 30**

**NONRESIDENT HUNTERS:**  
**5 caribou**

**July 1–Apr. 30**

...

(22)

Unit 26(C)

RESIDENT HUNTERS:

10 caribou; however, only  
bull caribou may be taken  
June 23-June 30

July 1–Apr. 30  
June 23–June 30

NONRESIDENT HUNTERS:

**1 bull**  
[5 CARIBOU]

**Aug 1–Sept. 30**  
[JULY 1–APR. 30]

**ISSUE:** This proposal decreases nonresident hunters' season dates within the Porcupine Caribou Herd's (PCH) range from July 1–April 30 to August 1–September 30 and changes the bag limit from 5 caribou to 1 bull. Photo-census data demonstrated a decline in the Porcupine Caribou Herd (PCH) from 178,000 caribou in 1989 to 123,000 caribou in 2001. Since 2001, population models indicate the herd continued to decline to levels near or below the intensive management objective of 100,000–150,000 caribou. The PCH is co-managed by the U.S. and Canada through the International Porcupine Caribou Board and this proposal supports the draft Harvest Management Plan (HMP) restrictions in Canada where most PCH harvest appears to occur.

These changes maintain most of the current use of the PCH for nonresident hunters. Reported nonresident harvest of PCH caribou in Alaska is low (26–36 per year), with few cow caribou taken (0–7 per year). However, there is a slight increasing trend in the number of nonresident hunters, total nonresident harvest, and nonresident cow harvest. During 2005–2008, most nonresident harvest occurred in August and September (>90 percent), and few nonresident hunters harvested more than one caribou.

Adult mortality, particularly of cows, has been identified as the most significant cause of the PCH decline. Annual harvest is estimated at 4,000–6,000 caribou. About 78 percent of harvest occurs in Canada by subsistence hunters and 7 percent by other residents of Canada and nonresidents hunting in Canada. About 15 percent of the harvest occurs in Alaska, 12 percent by subsistence hunters from Arctic Village, Kaktovik, Venetie, and Fort Yukon, and 3 percent by nonlocal Alaska residents and nonresidents.

As part of international co-management of the PCH, it is important to restrict hunter harvest in Alaska, because Canada has moved to restrict and monitor harvest in that country. Prior to 2009, PCH harvest in Canada was mostly unrestricted. In 2009, the Yukon government implemented interim conservation measures in an attempt to restrict all harvest until a harvest management plan is accepted and implemented in Canada. Canadian harvest is now limited to bulls only, licensed hunters are restricted to 1 bull, and reporting is required for all hunters. The Canadian management board has a draft harvest management plan under final review. This plan calls for unrestricted harvest for aboriginal hunters when the PCH is  $\geq 115,000$  and restricts licensed hunters to 2 bulls only; a voluntary bull-only harvest if herd size is 75,000–115,000; mandatory bull-only harvest with annual limits if herd size is 45,000–75,000; and prohibits harvest (except for ceremonial purposes) if herd size is below 45,000.

This proposal is a good faith effort to manage the PCH in concert with efforts in Canada by limiting nonresident seasons and bag limits while maintaining most of the current use in Alaska. This proposal would mirror the harvest limit for licensed hunters in Canada.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unsustainable cow harvest from a declining herd will continue and we will miss an opportunity to cooperatively manage PCH harvest.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Not applicable.

**WHO IS LIKELY TO BENEFIT?** Most Porcupine Caribou Herd user groups.

**WHO IS LIKELY TO SUFFER?** Nonresident hunters who want the opportunity to harvest cow caribou or more than one bull.

**OTHER SOLUTIONS CONSIDERED?** Reducing the bag limit to two bulls and reducing the season length to August 1–September 30.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-048

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**PROPOSAL 100 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Change the resident season and bag limit for caribou in Unit 25A as follows:

Unit 25A caribou - residents: Ten caribou. That portion of Unit 25A within the Chandalar River drainage west of and including the Middle Fork of the Chandalar and north of the main stem and the west fork of the Chandalar, July 1 – June 30. However, only velvet antlered bulls and antlerless cows may be taken from May 1 – June 30.

Remainder of Unit 25A July 1 – April 30.

**ISSUE:** Increase hunting opportunity for residents to hunt barren/dry cow and velvet antlered bull caribou in a portion of Unit 25A for Central Arctic Caribou in the spring and early summer. The Central Arctic Herd has increased in size and can support additional harvest opportunity.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Resident hunters will be denied harvest of Central Arctic Caribou during spring and early summer. Meat quality of barren/dry cows and velvet antlered bulls is very high at that time of year.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal allows taking of barren/dry or un-productive, but good condition cows, and velvet antlered bull caribou when they have recovered in the spring and summer to high-grade meat, when hunting conditions are favorable. Older barren/dry, unproductive cows will be distinguished by antler loss in the spring. These cows do not benefit the herd and are best harvested at this time of year.

**WHO IS LIKELY TO BENEFIT?** Resident hunters who want to harvest high quality caribou meat, in favorable temperatures of spring and early summer.

**WHO IS LIKELY TO SUFFER?** There would be a few people that would suffer from the hunters harvesting meat caribou.

**OTHER SOLUTIONS CONSIDERED?** There is no other solution to providing harvest at the proposed time of year, for harvestable surplus caribou.

**PROPOSED BY:** Jack Reakoff

**LOG NUMBER:** HQ-10S-G-021

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**PROPOSAL 101 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Modify the caribou bag limit in Unit 26B, Dalton Highway Corridor Management Area as follows:

Unit 26B remainder: Two caribou.....bulls....July 1 - September 30. (A portion of this area is within the DHCMA and additional restrictions apply.) Walk-in hunters from the Dalton Highway may only take one caribou of the bag limit, and all of the edible meat must be removed from the field to the road, before the next bull caribou is taken of the bag limit.

**ISSUE:** With the Board of Game increasing the bag limit for caribou in Unit 26B, there are more hunters attracted to this hunt. Many hunters are unfamiliar with walking on the tundra and packing out caribou. Caribou are often hunted by people who are new to Alaska. They fail to realize that a bull 350lb. caribou takes most fit hunters two round trips per caribou to carry out in pieces. Current bag limits easily exceed the walking hunters capability to remove caribou from the field. The aircraft and boat hunters have the means to retrieve all of the meat in the open ground season. The walk-in hunters are not physically able to, except, when the ground is frozen and there is snow for sleds, or they have dogs to assist.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Walk-in hunters when the land is thawed will kill their full bag limit only to find out they can not take care of all of the meat in a timely manner, if at all. This will lead to wasted caribou and citations for wanton-waste.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal assures that the edible meat of caribou taken from the Dalton Highway is salvaged and recovered from the field by walk-in hunters, during the warm weather months without snow to aid in transport. The quality of the meat taken and packed out soon after will be much more likely to be fit for human consumption.

**WHO IS LIKELY TO BENEFIT?** All hunters that walk off the Dalton highway to harvest caribou when there is a lack of snow. The caribou resource will be utilized in a better manner.

**WHO IS LIKELY TO SUFFER?** Those hunters that believe they are able to throw two caribou and gear on their pack and come out in one trip. They will erroneously feel they should be able to take their full bag limit at one time.

**OTHER SOLUTIONS CONSIDERED?** Ignoring the many hunters that get in over their head by harvesting too many caribou at one time. I rejected this idea, as I believe in wise use of our wildlife resources.

**PROPOSED BY:** Jack Reakoff

**LOG NUMBER:** HQ-10S-G-019

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**PROPOSAL 102 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Modify the resident season and bag limit for caribou in Unit 26B, remainder as follows:

Unit 26B remainder: Residents, two caribou total. Bulls: July 1 - September 30.

Any caribou: October 1 - April 30

\*\*Velvet antlered bulls and antlerless cows only: May 1 - June 30

**ISSUE:** Increase hunting opportunity for residents to hunt barren/dry cow and velvet antlered bull caribou in a portion of Unit 26B for Central Arctic caribou in the spring and early summer. The Central Arctic Herd has increased in size and can support additional harvest opportunity.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Resident hunters will be denied harvest of Central Arctic caribou during spring and early summer. Meat quality of barren/dry cows and velvet antlered bulls is very high at that time of year.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal allows taking of barren/dry or unproductive, but good condition cows, and velvet antlered bull caribou when they have recovered in the spring and summer to high-grade meat, when hunting conditions are favorable. Older barren/dry, unproductive cows will be distinguished by antler loss in the spring. These cows do not benefit the herd and are best harvested at this time of year.

**WHO IS LIKELY TO BENEFIT?** Resident hunters who want to harvest high quality caribou meat, in favorable temperatures of spring and early summer.

**WHO IS LIKELY TO SUFFER?** There would be a few people that would suffer from the hunters harvesting meat caribou.

**OTHER SOLUTIONS CONSIDERED?** There is no other solution to providing harvest at the proposed time of year, for harvestable surplus caribou.

**PROPOSED BY:** Jack Reakoff

**LOG NUMBER:** HQ-10S-G-020

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**PROPOSAL 103 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Modify the resident season and bag limit for caribou in Unit 26B, remainder as follows:

Unit 26B remainder, residents: Two caribou total. Bulls: July 1 - September 30.

Any caribou: October 1 - April 30.

Unit 26B remainder, south of 69 degree 30' N: Velvet antlered bulls and antlerless cows: April 1 - June 30.

**ISSUE:** Increase hunting opportunity for residents to hunt barren/dry cow and velvet antlered bull caribou in a portion of Unit 26B for Central Arctic caribou in the spring and early summer. The Central Arctic Herd has increased in size and can support additional harvest opportunity.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Resident hunters will be denied harvest of Central Arctic caribou during spring and early summer. Meat quality of barren/dry cows and velvet antlered bulls is very high at that time of year.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal allows taking of barren/dry or un-productive, but good condition cows and velvet antlered bull caribou when they have recovered in the spring and summer to high-grade meat, when hunting conditions are favorable. Older barren/dry, unproductive cows will be distinguished by antler loss in the spring. These cows do not benefit the herd and are best harvested at this time of year. This proposal avoids the calving area during harvesting.

**WHO IS LIKELY TO BENEFIT?** Resident hunters who want to harvest high quality caribou meat, in favorable temperatures of spring and early summer.

**WHO IS LIKELY TO SUFFER?** There would be a few people that would suffer from the hunters harvesting meat caribou.

**OTHER SOLUTIONS CONSIDERED?** There is no other solution to providing harvest at the proposed time of year, for harvestable surplus caribou.

**PROPOSED BY:** Jack Reakoff

**LOG NUMBER:** HQ-10S-G-022

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**PROPOSAL 104 - 5AAC 85.025. Hunting seasons and bag limits for caribou.** Expand bag limit for caribou in Unit 26B as follows:

**Resident Open Season  
(Subsistence and**

**Nonresident**

**Units and Bag Limit**

**General Hunts)**

**Open Season**

...  
(21)

...  
Unit 26(B) 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

**RESIDENT HUNTERS:**

**5 caribou per day**  
[10 CARIBOU]

July 1–Apr. 30

**NONRESIDENT HUNTERS:**

5 caribou

July 1–Apr. 30

**Remainder of Unit 26(B)**

**RESIDENT HUNTERS:**

**5** [2] caribou; however, cow caribou may be taken only from **Sept 1.** [OCT. 1]–April 30

July 1–Apr. 30

**NONRESIDENT HUNTERS:**

**5 caribou; however, cow caribou may be taken only from Sept. 1–April 30**  
[2 BULLS]

July 1–Apr. 30

**ISSUE:** The Central Arctic Caribou herd has grown 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 percent annually, consisting mostly of bulls (>90 percent). Currently, we estimate approximately 1,400 hunters harvest 1,000 caribou annually from an allowable harvest of 3,000 caribou.

This proposal may increase harvest such that we can attain the intensive management harvest objective of 1,400–1,600 caribou. Increasing the bag limit and liberalizing cow harvest during the month of September will provide additional hunting opportunity, particularly for hunters already in the field. The liberalization may also attract additional hunters because it becomes a more cost effective hunt. In northwestern Unit 26B, this aligns the bag limit with Unit 26A where local hunters frequently cross the Unit 26A–26B boundary.

Adding the language “remainder of” to the second part of Unit 26B is a housekeeping change to reinsert language that was inadvertently omitted in a previous printing of this regulation.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Some sustainable caribou hunting opportunity will be lost.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Hunters and families who would consume more than two caribou annually. There would also be a financial benefit because it is costly to hunt in Unit 26B and the opportunity to obtain additional meat would make the trip more affordable.

**WHO IS LIKELY TO SUFFER?** An increase in the number of hunters along the Dalton Highway could cause conflicts among hunters and between hunters and other highway users. Residents of the North Slope and communities south of Unit 26B on the Dalton Highway may not wish to see an increase in the number of hunters in the area.

**OTHER SOLUTIONS CONSIDERED?** Reduce restrictions on use of firearm and off-road vehicles for hunting within the Dalton Highway Management Corridor (10 mile wide corridor along the Dalton Highway). However, changing these regulations requires changes in Alaska Statutes 16.05.789 and 19.40.210.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-047

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**PROPOSAL 105 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Develop a management plan for the Central Arctic Herd in Units 26B and 26C as follows:

The Board of Game should maintain current bag limits, and access to assure herd robustness. Current management has allowed the herd to excel. Season extension to provide some additional use can be supported. A directive to develop a harvest strategy plan to achieve highest population, in equilibrium with human harvests. These are achieved with healthy bull:cow ratio, tracking of range use, productivity of the herd, and harvests that do not eliminate any one of these health components. A harvest plan for the Central Arctic Herd is necessary in light of the larger, currently declining Porcupine Herd and the western Arctic herds. Caution is always prudent with low reproductive species like caribou.

**ISSUE:** Address harvest parameters of the Central Arctic Herd. The Central Arctic Herd has just started to expand into its historic range. The herd should not be managed for reduction. Harvest should allow sustainability and the herd use of its entire range. Current management is for five percent harvest rate, which is not sustainable with all sex harvest. Multi-sex harvest should be two-three percent.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Over liberalized bag limits and access to reduce the herd, is not sustainable for Arctic caribou. The Central Arctic Herd is in dire need of a management plan that will direct the Department to manage for herd robustness. Cutting the herd down to 28-32,000 animals is arbitrary. Arctic caribou populations rely on large numbers and long movements to evade predation factors. These movements allow them to access food resources that have been unused. A management plan for these highly accessible Central Arctic caribou with forward thinking objectives, will provide best use of the resource. Without a plan there is a high likelihood the Central Herd will be drastically reduced and harvest opportunity greatly diminished.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** This proposal is designed to enhance the use of the caribou that comprise the Central Arctic Herd. A plan that seeks robustness of the herd will benefit the resource and the human uses of them. Forward thinking planning for true sustainability is incumbent on the Board of Game.

**WHO IS LIKELY TO BENEFIT?** All of the people who want to harvest Central Arctic caribou. Maintenance of more animals will allow harvest by a larger human user base.

**WHO IS LIKELY TO SUFFER?** Those hunters who want large bag limits for a short period of time.

**OTHER SOLUTIONS CONSIDERED?** There are few alternatives for development of a forward thinking management plan for the Central Arctic Caribou Herd. Reactionary proposals once the herd is in decline should be avoided in sustained yield management. It is in the best interest of Alaskans to provide the best management possible for our last large remaining caribou herds.

**PROPOSED BY:** Jack Reakoff

**LOG NUMBER:** HQ-10S-G-023

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**PROPOSAL 106 - 5 AAC 92.220. Salvage of game meat, furs, and hides.** Modify the salvage requirements for moose in Unit 25 as follows:

Moose taken in Unit 25 would have the special meat salvage requirement that the edible meat of the front quarters, hind quarters, and the ribs must remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption.

OR

All current meat salvage requirements should apply for moose taken in Unit 25.

**ISSUE:** Reducing the spoilage and waste of harvested moose meat in Unit 25 transported from the field.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Waste of valuable moose meat and violation of time honored practice of utilizing as much as possible from the harvested moose will continue.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Proper field dressing coupled with a meat on the bone requirement for Unit 25 would result in better cooling and drying of meat harvested, less meat wasted by being left in the field, and a better quality meat for processing for the hunters, their families, and their communities.

**WHO IS LIKELY TO BENEFIT?** All hunters would benefit by maximizing what the land has provided them. (NOTE: This proposal was an action item of the Eastern Interior Regional Advisory Council during its public meeting in March, 2009 in Fairbanks, Alaska.)

**WHO IS LIKELY TO SUFFER?** Hunters who prefer boning out the meat.

**OTHER SOLUTIONS CONSIDERED?** None/

**PROPOSED BY:** Eastern Interior Alaska Subsistence Regional Advisory Council

**LOG NUMBER:** HQ-10S-G-002

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**PROPOSAL 107 - 5 AAC 85.045 (a) (24) Hunting seasons and bag limits for moose.** Open a general hunting season for moose in Unit 26C as follows

<b>Units and bag limits</b>	<b>Resident Season</b>	<b>Nonresident Season</b>
Unit 26C	[NO OPEN SEASON]	
<b><u>One moose by registration permit</u></b>	<b><u>Sept 5-Apr 15</u></b>	
<b><u>One bull with 50 inch antlers Or 4 or more brow tines on one side by registration permit</u></b>		<b><u>Sept 5-Nov 30</u></b>

**ISSUE:** The moose populations on the North Slope continue to grow. Several areas of the eastern Brooks range are showing signs of over-browsing from the wintering moose populations. There are little or no moose during the traditional hunting season in September due to their migratory habits so season would have to be late in the year. Many moose spend the winter in the valleys of the northern Brooks Range. The moose start to move into these areas around October 1. Liberal season could be established with very little harvest due to the remote nature of the area and difficulty of access during this time of year. A registration hunt would eliminate the risk of over hunting the area.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Excess moose will eventually starve to death during the next hard winter. Browse will continue to be depleted. Hunters will have no opportunity to hunt these moose other than one or two federal subsistence tags.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCT PRODUCED BE IMPROVED?** Yes, the resource is not currently being harvested at all.

**WHO IS LIKELY TO BENEFIT?** Those that like to eat moose meat and would like to hunt the most remote part of Alaska at a very tough time of year.

**WHO IS LIKELY TO SUFFER?** Those that would like to see moose starve to death during the spring or oppose hunting in ANWR.

**OTHER SOLUTIONS CONSIDERED?** General open season. Harvest should be very small as this is the most remote portion of Alaska and hunts would take place in winter. This proposal was submitted in 2008 and rejected due to lack of information about the area. Refuge staff said they would gather info about the browse in the area.

**PROPOSED BY:** Anchorage AC

**LOG NUMBER:** SC-10S-G-002

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**REGION I – SOUTHEAST**

**PROPOSAL 108 - 5 AAC 085.045. Hunting seasons and bag limits for moose.** Reauthorize the existing antlerless moose season in Berners Bay.

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(1)		
...		
Unit 1(C), Berners Bay drainages	Sept. 15 – Oct.15 (General hunt only)	Sept. 15 – Oct.15
1 moose by drawing permit only; up to 30 permits may be issued		
...		

**ISSUE:** Antlerless moose hunts must be reauthorized annually by the Board. The Berners Bay strategic moose management plan calls for a post-hunt count of 90 moose, based on the estimated moose carrying capacity of this area. The Department has been very successful at maintaining this population level through the harvest of both bull and cow moose.

During 1998–2006, the number of drawing permits issued by the department for this herd ranged from 10 bull permits and 10 antlerless permits to 7 bull permits and 0 antlerless permits. The average annual harvest of bull moose during this period was seven, while cow harvests in years we issued antlerless permits was 4. Although we have the latitude of issuing up to 30 permits annually, we haven’t issued more than 20 permits annually during any of the past 10 years; and no permits were issued during the period 2007-2009.

The number of moose counted during the fall aerial surveys determines the number of drawing permits issued. Aerial counts during 1990–2006 ranged from a high of 108 moose in 1999 to a low of 59 in 2002. The fall 2006 count of 76 moose was just one lower than the mean annual count of 77 during 1990–2006. The number of moose counted in replicate aerial surveys in 2007 and 2008 ranged between 33-62 moose. Estimated overwinter survival for cow moose during the period 2006-2008 was 85 percent, 87 percent and 92 percent, respectively, suggesting that mortality rates have declined since the severe winter of 2006/2007. We anticipate the fall 2009 survey count to be similar to that of 2008.

As a result of the severe winters and the impacts they have had on this moose herd, we did not issue any permits in 2009 and do not anticipate issuing any permits for either bull or cow moose during the next year or two. We will continue to monitor this population through annual composition surveys, and use these numbers to decide whether or not we will issue any permits. In addition we will be collecting information on moose survival, mortality, and recruitment. If we begin to detect an increasing trend in moose numbers, and determine that this population is recovering, we can then decide whether a few permits can be issued. Very likely this would be only bull permits for the foreseeable future. In spite of this, we would prefer to keep continue the antlerless authorization so we have this tool in the future when needed.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The population could increase and exceed the carrying capacity of the habitat as it has done in the past. The Berners Bay moose harvest will be restricted to bulls thereby limiting opportunity for hunters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** No.

**WHO IS LIKELY TO BENEFIT?** Hunters will have more opportunity to hunt moose. The moose population will benefit from either-sex harvests that will balance the herd.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED:** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-054

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**PROPOSAL109 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Reauthorize the existing antlerless moose season in the Gustavus area.

	<b>Resident</b>	
	Open Season	
<b>Units and Bag Limits</b>	<b>(Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>

(1)

...

Unit 1(C), that portion west of Excursion Inlet and north of Icy Passage

1 moose per regulatory year, only as follows:

1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side by registration permit only; or	Sept. 15 – Oct. 15 (General hunt only)	Sept. 15 – Oct. 15
1 antlerless moose  by drawing permit only; up to 100 permits may be issued	Nov. 10 – Dec. 10  (General hunt only)	Nov. 10 – Dec. 10

**ISSUE:** Antlerless moose hunts must be reauthorized annually by the Board. The Gustavus moose population (Unit 1C) increased rapidly from just a few animals during the 1980's to a count of 185 animals in 1998, to a subsequent count of 404 animals in 2003. By 2002 the Department estimated the winter range moose density at Gustavus exceeded 5 moose per km<sup>2</sup>, with only a small portion of that area being productive winter range as identified by abundant stands of willow. Because of concerns with these high moose numbers, the Department biologists began conducting spring browse utilization surveys in 1999, and documented 85–95 percent of the current annual growth of willow twigs available to moose had been consumed. This trend has continued to present, and the Department biologists are convinced this high moose population is not sustainable.

Based on the browse utilization data and overall moose densities at Gustavus, an antlerless hunt was first authorized for the Gustavus area by the BOG in fall 2000. Since that time, hunters have harvested 10, 30, 54, 67, 11 and 10 cow moose during the period 2002-2006, and 2008 respectively. The fall 2007 antlerless hunt was cancelled after nearly 20 percent of radio-collared cow moose (n=33) died from natural causes presumably linked to the severe winter of 2006/2007; the annual survival estimate for cow moose during 2006 was 84 percent. The survival estimate for both 2007 and 2008 increased to 89 percent. A conservative number of antlerless drawing permits were awarded for fall 2008 after a less severe winter in 2007/2008. No permits were awarded for fall 2009 due to concerns with persistent snow during winter 2008/2009 and affects this may have on the moose herd in future years.

the Department biologists have been able to collect rump fat measurements as an index of body condition as well as collect pregnancy and twinning rate data from the reproductive tracts from the majority of the harvested animals. The rump fat index has been very low in comparison to similar measurements taken during early winter from moose in other populations throughout Alaska. In addition, the percent of females that were pregnant and the percent carrying twins was also below that found in many other populations, and below thresholds expected for a healthy moose population. In addition to these data collected from harvested cow moose, capture operations conducted during spring and fall from 2003 through 2008 accounted for approximately 20-30 cow moose per capture session being measured for rump fat and assessed for pregnancy. The rump fat indices for both pre and post winter were very low in comparison to similar measurements taken from moose in other populations throughout the state. Body

condition indices are slowly improving for Gustavus cow moose; however, these indices are still below those of other coastal herds that have been sampled.

Although an antlerless hunt was not held in 2009, biologists believe it is important to keep this tool available to implement if needed. By closing the antlerless hunt in fall 2007 and 2009, biologists have shown that they will use the antlerless hunt with caution and utilize this harvest strategy only in the case where they believe it is necessary or justified.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** This moose population could persist at a density too high for the habitat to support, thereby continuing the overutilization of winter browse. Ultimately biologists are concerned that the long range carrying capacity of this range could be compromised due to this over utilization of preferred winter browse species.

**WHO IS LIKELY TO BENEFIT?** All persons interested in having a healthy moose population, and one that does not compromise the health of the habitat they depend on. Also, an antlerless hunt can provide additional opportunity for those people interested in harvesting a moose.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED:** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-055

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**PROPOSAL 110 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Reauthorize the existing antlerless moose season at Nunatak Bench.

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(3)		
Unit 5(A), that portion south of Wrangell-Saint Elias National Park, north and east of Russell and Nunatak Fjords, and east of the east side of East Nunatak Glacier to the Canadian Border (Nunatak Bench)	Nov. 15 - Feb. 15	Nov. 15 - Feb. 15

1 moose by registration  
permit only; up to 5  
moose may be taken

...

**ISSUE:** Antlerless moose hunts must be reauthorized annually by the Board. The Nunatak Bench (Unit 5A) hunt area is separated from adjacent moose habitat by fiords and glaciers, allowing for little immigration or emigration by moose. Therefore we manage this population separately from the remainder of Unit 5A, with a much longer and later running hunting season that spans the period of November 15-February 15. Because of the isolated nature of Nunatak Bench and the limited amount of moose habitat, we have traditionally allowed maximum hunter opportunity through an either sex hunt, thereby aiding in our goal of limiting herd growth to stay within the carrying capacity of this area. The either sex hunt strategy accommodates the timing of this hunt given that much of the hunt period occurs post antler drop making sex differentiation difficult.

The Nunatak Bench strategic moose management plan calls for a post-hunt population of a maximum of 50 moose. During a February 2001 survey 52 moose were counted in this area followed by 25 in December 2003. However, since that time the moose population at Nunatak Bench has declined dramatically, with counts of 14, 11, and 14 moose in 2005, 2006, and 2007 respectively. An aerial survey of the Nunatak Bench area was not completed in 2008. The decline in moose numbers is almost certainly related to the 68 foot rise in water level that flooded this area in 2003 when the advancing Hubbard Glacier created a dam. A similar situation occurred in 1986 that caused a similar decline in moose numbers. The cause of the moose declines post flooding appears to be due to the decimation of preferred willow browse by the high water, causing emigration of moose from the area.

During 1997-2004 hunting seasons an average of 12 permits were issued, with only four people actually hunted each season. An average of 8 days of hunting was expended each year to kill 0-4 moose, with an average annual harvest of about 2 moose. Six cows and 9 bulls made up the total harvest during this period. No moose have been harvested since 2004 and the department has not issued any permits for this area since then.

Although the moose numbers at this time do not support a harvest, the department would like to keep this antlerless authorization active should the moose numbers again reach a harvestable level (25 moose). After the 1986 flood, this population rebounded within 8 years from 10 to 25 moose and again supported a hunt. If this herd follows a similar pattern, we may see an opportunity to harvest moose here in a few more years. The department will continue to monitor this moose population and again allow a harvest when the survey counts reach or exceed 25 moose.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The harvest of moose at Nunatak Bench will be limited to bulls without any biological reason to do so. In addition, since much of the season occurs post antler-drop restricting the harvest to bulls would make it difficult for hunters to select a legal animal. Moose habitat is not abundant in this area and if herd growth is not restricted by a limited cow harvest, carrying capacity of winter range may be exceeded.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Adopting this proposal will provide more moose hunting opportunity.

**WHO IS LIKELY TO BENEFIT?** Hunters will continue to have more opportunity to hunt moose. The moose population will benefit from either-sex hunts that will help balance the herd in this area of limited moose range.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED:** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-056

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**REGION II – SOUTHCENTRAL/SOUTHWEST**

**PROPOSAL 111 - 5 AAC 085.045.(4) Hunting seasons and bag limits for moose.** Re-authorizes the antlerless moose season in Unit 6(A).

<b>Seasons and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(4)		
Unit 6 (A), all drainages into the Gulf of Alaska from Cape Suckling to Palm Point		
1 moose per regulatory year, only as follows:		
RESIDENT HUNTERS:		
1 bull by registration permit only; up to 30 bulls may be taken; or	Sept. 1-Nov. 30 (General hunt only)	
1 antlerless moose by drawing permit only; up to 30 drawing permits may be issued	Sept. 1-Nov. 30 (General hunt only)	
NONRESIDENT HUNTERS:		
1 bull by drawing permit only; up to 5 drawing permits may be issued		Sept. 1- Nov. 30
Remainder of Unit 6(A)		
1 moose per regulatory year, only as follows:		
RESIDENT HUNTERS:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Sept. 1- Nov. 30 (General hunt only)	
1 antlerless moose by registration permit only; up to 20 antlerless moose may be taken	Nov. 15-Dec. 31 (General hunt only)	
NONRESIDENT HUNTERS:		

1 bull with 50-inch antlers  
or antlers with 3 or more  
brow tines on one side; or

Sept. 1- Nov. 30

1 antlerless moose by  
registration permit; up to 20  
antlerless moose may be taken

Nov. 15-Dec. 31

...

**ISSUE:** Antlerless moose seasons must be re-authorized annually. We recommend continuation of the antlerless season to promote population stability. The desirable post-hunt population size in Unit 6(A) west of Cape Suckling is 300 to 350 moose. A census completed during January 2008 yielded a population estimate of 275 moose with 7 percent calves. The antlerless hunt has not been open since 2005.

The desirable post-hunt population size in Unit 6(A) east of Cape Suckling is 300 to 350 moose. A census completed during February 2008 yielded a population estimate of 230 moose with 7 percent calves. No antlerless hunts were held because of previous poor calf survival and population level below the management objective. However, if recruitment does improve, antlerless hunts may be needed to hold the moose population at objective levels.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If antlerless hunts are eliminated in Unit 6(A), hunting opportunity will be needlessly lost.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Individuals who desire to hunt antlerless moose in Unit 6(A).

**WHO IS LIKELY TO SUFFER?** People who are opposed to antlerless moose hunting.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-057

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**PROPOSAL 112 - 5 AAC 085.045.(4) Hunting seasons and bag limits for moose.** Re- authorizes the antlerless moose season in Unit 6(B).

<b>Resident</b>	
<b>Open Season</b>	
<b>(Subsistence and</b>	<b>Nonresident</b>

Units and Bag Limit	General Hunts)	Open Season
(4)		
...		
Unit 6(B)		
1 moose per regulatory year, only as follows:		
1 antlered moose by registration permit only; up to 30 antlered moose may be taken; or	Aug. 27- Oct. 31 (General hunt only)	No open season
1 antlerless moose by drawing permit only; up to 30 drawing permits may be issued for antlerless moose;	Aug. 27- Oct. 31 (General hunt only)	No open season

...

**ISSUE:** Antlerless moose seasons must be re-authorized annually. Desirable post-hunt population size is 300-350. A survey completed during January 2008 indicated a population of 240 moose with 9 percent calves. Antlerless hunts have not been held during recent years because of continued poor calf survival and population level below the management objective. However, if the population increases to the desired level, antlerless hunts may be needed to hold the population at objective levels.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If the moose population in Unit 6(B) increases and a season is possible, antlerless hunts will provide additional hunting opportunity.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Individuals who desire to hunt antlerless moose in Unit 6(B).

**WHO IS LIKELY TO SUFFER?** People who are opposed to antlerless moose hunting.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-058  
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**PROPOSAL 113 - 5 AAC 085.045.(4) Hunting seasons and bag limits for moose.** Re-authorizes the antlerless moose season in Unit 6(C).

Seasons and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(4)		
...		
Unit 6(C)	Sept. 1-Oct. 31 (General hunt only)	No open season.
1 moose by drawing permit only; up to 40 permits for bulls and up to 20 permits for antlerless moose may be issued		
...		

**ISSUE:** Antlerless moose seasons must be re-authorized annually. The population objective is 400 moose. A census completed during January 2009 yielded an estimate of 360 moose, 19 percent of which were calves. Because the available antlerless harvest quota in Unit 6(C) is currently harvested under a federal subsistence season administered by the U. S. Forest Service, we have not held the antlerless hunt since the 1999-2000 seasons. We recommend re-authorizing the state antlerless hunt in the event that the federal subsistence hunt is cancelled. If recruitment improves, continuation of the antlerless hunts will be necessary to hold the population at objective levels.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunting opportunity will be lost, and the population may exceed the objective, which is based on the availability of adequate habitat during severe winters.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?**

**WHO IS LIKELY TO BENEFIT?** Hunters desiring to take a moose in Unit 6(C).

**WHO IS LIKELY TO SUFFER?** Those opposed to antlerless moose hunting.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-059

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**PROPOSAL 114 - 5 AAC 85.045(12). Hunting seasons and bag limits for moose.** Re-authorizes the drawing permit hunts for antlerless moose in Unit 14(A).

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		

Unit 14(A)

1 moose per regulatory year,  
only as follows:

...

1 antlerless moose by drawing permit only; up to 500 antlerless moose permits may be issued	Aug. 20-Sept. 25 (General hunt only) Nov. 1-Nov. 15 (General hunt only)	No open season
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...

**ISSUE:** Antlerless moose hunts must be re-authorized annually by the Board. During November 2008, the subpopulation of moose in Unit 14(A) was surveyed and estimated at 6,614 which were slightly more than the post-hunt objective of 6,000 – 6,500 moose. During this survey we observed 23 bulls and 40 calves: 100 cows. In November 2009 composition counts showed 25 bulls and 50 calves: 100 cows. Snow depth accumulations in the subunit during the last 4 winters overall were average and survival of calves and adults was good.

During 1999 and 2000, we issued no permits because the subpopulation estimate remained below objective levels. In 2001 we resumed the antlerless hunts because the population had recovered and actually exceeded objectives. The 14A population is currently at or above the upper end of management objectives. Our strategy for harvesting cows from 8 different permit hunt areas within the subunit was to concentrate antlerless moose permits in those areas where moose densities were highest. Minor adjustments to permit numbers and drawing areas were made in 2007 to address areas with numerous nuisance moose calls. Also, the addition of a youth antlerless moose hunt in the Point MacKenzie area was began in 2007 (DM412). The permits for this hunt were allocated from the existing antlerless permit hunt area (DM402).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Portions of the Unit 14(A) moose subpopulation could grow beyond the ability of the habitat to sustain that population level. Increased cases of starvation, conflicts with humans and vehicle collisions will occur.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes; excessively high moose density can lead to nutritionally stressed animals in the harvest.

**WHO IS LIKELY TO BENEFIT?** All who wish a healthy, productive moose population in the Matanuska-Susitna valleys, and those who wish to use antlerless moose for human consumption.

**WHO IS LIKELY TO SUFFER?** Those who disagree with the harvest of antlerless moose.

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-060

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**PROPOSAL 115 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14(C).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(5) ...		
Unit 7, the Placer River drainages, and that portion of the Placer Creek (Bear Valley) drainage outside the Portage Glacier Closed Area, and that portion of Unit 14(C) within the Twentymile River drainage		

**RESIDENT HUNTERS:**

1 moose by drawing permit only; up to 60 permits for bulls will be issued in combination with nonresident hunts, and up to 70 permits for antlerless moose will be issued	Aug. 20—Oct. 10 (General hunt only)
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**NONRESIDENT HUNTERS:**

1 bull by drawing permit only;	Aug. 20—Oct. 10
--------------------------------	-----------------

up to 60 permits for bulls  
will be issued in combination  
with resident hunts

...

**ISSUE:** Antlerless moose seasons must be re-authorized annually. A mid-November 2008 aerial composition count of moose in the Twentymile, Portage, and Placer river drainages found 191 moose with a bull:cow ratio of 33 bulls per 100 cows and a calf:cow ratio of 25 calves per 100 cows. This is the second-highest composition count for this hunt area, and this population has a history of rapid increase following mild winters; consequently, antlerless permits were issued for the first time since 2004. Thirty antlerless permits were issued for 2009, and the number of bull permits were increased from 20 to 40. Harvests for 2007, 2008, and 2009 were 12 bulls, 13 bulls, and 25 bulls and 17 cows, respectively.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The population will probably increase and could suffer major losses during a severe winter. Habitat may be overbrowsed, reducing carrying capacity in subsequent years, and road and train kills will increase.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Moose populations that are not stressed by winter food shortages are healthier and more productive.

**WHO IS LIKELY TO BENEFIT?** People who obtain a drawing permit, wildlife viewers and motorists driving in the Portage area. Visitor use is high and viewing is an important activity in this area.

**WHO IS LIKELY TO SUFFER?** People who are opposed to antlerless moose hunting.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-061

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**PROPOSAL 116 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in the Fort Richardson Management Area in Unit 14(C).

	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
<b>Units and Bag Limits</b>		

(12)

...

Unit 14(C), Fort Richardson  
Management Area

Day after Labor Day  
-Mar. 31  
(General hunt only)

Day after Labor Day  
-Mar. 31

1 moose per regulatory year by  
drawing permit, and by  
muzzleloading blackpowder  
rifle or bow and arrow only; up  
to 160 permits may be issued.

...

**ISSUE:** Antlerless moose seasons must be re-authorized annually. A late November aerial census on Fort Richardson, Elmendorf Air Force Base, and upper Ship Creek yielded a population estimate of 474 moose with a bull:cow ratio of 48 bulls per 100 cows and a calf:cow ratio of 15 calves per 100 cows. At that time the population was slightly below the population objective of 500 moose; however, this population has a history of rapid increase following mild winters. Ten antlerless permits were issued for the fall archery and muzzleloader hunts in 2007 and 2008 and five antlerless permits were issued for the fall muzzleloader hunt in 2009. An additional 55 either-sex archery-only permits were issued for a late-season hunt in 2007, 2008, and 2009. Harvests for 2006, 2007, and 2008 were 24 bulls and 18 cows, 20 bulls and 21 cows, and 31 bulls and 21 cows, respectively. No cows were harvested in the fall 2009 muzzleloader hunt; however, the late-season, either-sex hunt permittees are likely to take 15-20 cows.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The population is likely to exceed the carrying capacity of the habitat if antlerless hunts are not authorized.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Moose populations that are not stressed by winter food shortages are healthier and more productive.

**WHO IS LIKELY TO BENEFIT?** Muzzleloaders and bow hunters who draw permits. Persons living near Fort Richardson who incur damage to their gardens and shrubs and motorists on the Glenn Highway and in east Anchorage.

**WHO IS LIKELY TO SUFFER?** Those who oppose antlerless moose hunting, and archery or muzzleloader hunting or hunting in general.

**OTHER SOLUTIONS CONSIDERED?** Long-term, large-scale habitat enhancement is desirable but difficult because of costs and conflicts with military operations.

**PROPOSED BY:** Alaska Department of Fish and Game and U. S. Army, Fort Richardson

**LOG NUMBER:** HQ-10S-G-062

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**PROPOSAL 117 - 5 AAC 85.045(12). Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in the Anchorage Management Area in Unit 14(C).

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(12)		
...		
Unit 14(C), that portion known as the Anchorage Management Area	Day after Labor Day -Nov. 30 (General hunt only)	No open season
1 antlerless moose by drawing permit only, and by bow and arrow, shotgun, or muzzleloader only; up to 50 permits may be issued		
...		

**ISSUE:** Antlerless moose hunts must be re-authorized annually. During summer, an estimated 200-300 moose inhabit the Anchorage metropolitan area. This number increases to 700-1,000 moose during the winter. Many of these moose come from the upper Campbell Creek valley, which lies within Chugach State Park. One hundred sixty-one moose (41 bulls, 90 cows, 30 calves) were counted in fall 2001 and 117 moose (21 bulls, 79 cows, 17 calves) were counted in fall 2003. Most of these moose move into the metropolitan area during December or January, where high densities of moose cause severe overbrowsing in some areas, and lead to increased incidences of collisions with motor vehicles and adverse conflicts with humans.

Eight antlerless permits were issued for the upper Campbell Creek and McHugh Creek drainages in 2007 and 2008 and 10 antlerless permits were issued in 2009. Hunters took 5 cows in 2007, 5 cows in 2008, and 4 cows in 2009 (preliminary).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The moose population will continue to overbrowse winter habitat and mortality of moose attributable to collisions with vehicles and starvation during severe winters will continue.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Moose populations that are not stressed by winter food shortages are healthier and more productive.

**WHO IS LIKELY TO BENEFIT?** People who acquire permits for antlerless moose hunts. People who believe there are too many moose in the Anchorage Bowl.

**WHO IS LIKELY TO SUFFER?** People opposed to hunting antlerless moose, hunting moose in parks, or hunting in general.

**OTHER SOLUTIONS CONSIDERED?** None. This hunt has been successful in creating additional moose hunting opportunity in the state’s most heavily populated area with little or no controversy. It may also ameliorate overbrowsing the limited winter range and reduce vehicle collisions and conflicts with residents in nearby urban areas.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-063

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**PROPOSAL 118 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in the Birchwood Management Area and the remainder of Unit 14(C).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
...		
Unit 14(C), that portion known as the Birchwood Management Area	Day after Labor Day -Sept. 30 (General hunt only)	Day after Labor Day -Sept. 30
1 moose by drawing permit, by bow and arrow only; up to 25 permits may be issued		
...		
Remainder of Unit 14(C)		
1 moose per regulatory year, only as follows:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Day after Labor Day -Sept. 30 (General hunt only)	Day after Labor Day -Sept. 30

1 antlerless moose by drawing permit only; up to 60 permits may be issued

Day after Labor Day  
-Sept. 30  
(General hunt only)

No open season

**ISSUE:** Antlerless moose seasons must be re-authorized annually. Composition counts are not flown in the Birchwood Management Area. However, we believe that a small resident population of 10-15 moose as well as an equal number of animals from Fort Richardson frequent the area. Ten bull and 5 antlerless permits were issued in 2007 and 5 bull permits in 2008 and 2009. Archers took 1 bull in 2007 and 2 bulls in 2009. Very little public land exists in this management area and most of it is city parkland closed to discharge of weapons. Large parcels of land owned by Eklutna Native Corporation could not be hunted by permittees because no access permits were issued, and this land is quickly turning into subdivisions. Despite the warning in the permit supplement that cautions hunters about the private property and low success rates, hunters are increasingly frustrated when they obtain one of these permits and cannot find a place to hunt. The one large block of public land remaining in this hunt area is Beach Lake Park, where discharge of firearms and bows is not allowed by city park ordinance. A management plan for this park is currently underway, and the department hopes to gain permission to allow hunting in the park.

Composition counts are seldom flown in the remainder of Unit 14(C) due to lack of funding. One hundred thirty-nine cows were counted during the fall 2001 trend counts in Knik/Hunter and Peters Creek count areas. The moose populations in these areas appeared to be at or above carrying capacity; however, to manage the moose population conservatively, lacking recent trend data, the number of antlerless permits was reduced from 20 to 10 in 2007. Hunters in Knik/Hunter took 2 cows and 1 antlerless bull in 2007, 1 cow in 2008, and 1 cow in 2009 (preliminary). Permittees in Peters Creek took no cow moose in 2007, 2008, or 2009 (preliminary).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The opportunity to harvest antlerless moose will be lost, and urban moose-human conflicts will likely increase.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Moose populations that are not stressed by winter food shortages are healthier and more productive.

**WHO IS LIKELY TO BENEFIT?** Persons who acquire permits for antlerless moose hunts.

**WHO IS LIKELY TO SUFFER?** People opposed to antlerless moose harvest or hunting in general.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

LOG NUMBER: HQ-10S-G-064

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**PROPOSAL 119 - 5 AAC 085.045(12). Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose hunt on Elmendorf Air Force Base in Unit 14(C)

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
...		
Unit 14(C), Elmendorf Air Force Base	Day after Labor Day -Mar. 31 (General hunt only)	Day after Labor Day -Mar. 31
1 moose by drawing permit, and by bow and arrow only; up to 25 permits may be issued.		
...		

**ISSUE:** Antlerless moose seasons must be re-authorized annually. Moose on Elmendorf Air Force Base are part of a resident wintering population that also occupies Fort Richardson. A late November 2008 census on Ft. Richardson, Elmendorf Air Force Base and upper Ship Creek yielded a population estimate of 474 moose. During September, up to 100-150 of these moose frequent lands managed by Elmendorf. A majority of these animals move to Fort Richardson during late fall and winter, many into areas where hunting is not allowed. Because the density of hunters on Fort Richardson has reached maximum manageable levels, the Elmendorf hunt provides additional hunter opportunity and helps achieve desired harvest levels. Thirteen bull, 7 antlerless and 5 either-sex permits were issued in 2007 and 2008. Thirteen bull and 5 either-sex permits were issued in 2009. During the 2007, 2008, and 2009 (preliminary) seasons, hunters took 4 bulls and 7 cows, 7 bulls and 5 cows, and 8 bulls and 0 cows (preliminary), respectively.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Habitat may be over-browsed, reducing carrying capacity in subsequent years, and road and train kills will increase. The overall Fort Richardson-Elmendorf Air Force Base moose population is thought to have been above carrying capacity during the severe 1994-1995 winter. Browse was over-utilized across extensive areas during the severe winters of 1989-1990, 1991-1992, and 1994-1995. If cows are not harvested, the population will increase and suffer major losses during a severe winter.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BY IMPROVED?** Yes. Moose populations that are not stressed by winter food shortages are healthier and more productive.

**WHO IS LIKELY TO BENEFIT?** Bowhunters who draw permits. Persons living on or near Elmendorf Air Force Base who incur damage to their gardens and shrubs, and motorists on Elmendorf and in north Anchorage.

**WHO IS LIKELY TO SUFFER?** Those opposed to antlerless moose hunting, bow and arrow hunting, or hunting in general.

**OTHER SOLUTIONS CONSIDERED?** Long-term, large-scale habitat enhancement is desirable, but difficult because of costs and conflicts with military operations.

**PROPOSED BY:** Alaska Department of Fish and Game and Elmendorf Air Force Base

**LOG NUMBER:** HQ-10S-G-065

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**PROPOSAL 120 - 5AAC 85.045(12). Hunting seasons and bag limits for moose.** Reauthorize the antlerless portion of the any-moose drawing permit in the upper Ship Creek drainage in Unit 14(C).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(12)		
...		
Unit 14(C), that portion of the Ship Creek drainage upstream of the Fort Richardson Management Area		
1 moose by drawing permit only; up to 50 permits may be issued; or	Day after Labor Day --Sept. 30 (General hunt only)	Day after Labor Day --Sept. 30
1 bull by registration permit only	Oct. 1—Nov. 30 (General hunt only)	Oct. 1—Nov. 30
...		

**ISSUE:** Moose use the upper Ship Creek drainage throughout the year. However, the highest density appears to be in fall and early winter when rutting and post-rut concentrations occur. In most years, accumulated snow packs force most of the moose out of the upper Ship Creek drainage in December. The moose move to lower-elevation wintering areas on Fort Richardson, Elmendorf AFB, and other portions of the Anchorage Bowl. A late November 2008 census on Fort Richardson, Elmendorf Air Force Base and upper Ship Creek yielded a population estimate of 474 moose with a bull:cow ratio of 48 bulls per 100 cows and a calf:cow ratio of 15 calves per 100 cows. Fifty either-sex drawing permits were issued for upper Ship Creek drainage in 2007, 2008, and 2009. Hunters took 9 bulls and 3 cows in 2007, 6 bulls and 4 cows in 2008, and 10 bulls and 5 cows in 2009 (preliminary). An additional 17 bulls (and 1 illegal cow), 11 bulls, and 7 bulls (preliminary) were taken in an any-bull registration hunt after the drawing hunts in 2007, 2008, and 2009, respectively.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Yes. Moose populations that are not stressed by winter food shortages are healthier and more productive. An either-sex drawing moose hunt should allow greater harvests in an area with limited access.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Moose will continue to be under-harvested, with concomitant problems in nearby urban areas and occasional large die-offs during severe winters.

**WHO IS LIKELY TO BENEFIT?** Moose hunters.

**WHO IS LIKELY TO SUFFER?** People opposed to moose hunting.

**OTHER SOLUTIONS CONSIDERED?** None. A late-season registration hunt for any bull was held in 2007, 2008, and 2009 to harvest additional moose from upper Ship Creek drainage.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-066

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**PROPOSAL 121 - 5 AAC 085.045.(13) Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in the Skilak Loop Wildlife Management Area of Unit 15(A).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13)		

Unit 15(A), the Skilak Loop

Wildlife Management Area

1 moose by drawing permit only; up to 30 permits for spike-fork antlered moose may be issued; or	Sept. 15-Sept. 30 (General hunt only)	Sept. 15- Sept. 30
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1 antlerless moose by drawing permit only; up to 50 permits may be issued; the taking of calves, and females accompanied by calves is prohibited	Sept. 15-Sept. 30 (General hunt only)	No open season
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...

**ISSUE:** Antlerless moose seasons must be re-authorized annually. A joint management objective developed for the Skilak Loop Wildlife Management Area (SLWMA) by the Department and U. S. Fish and Wildlife Service calls for a fall population of approximately 2 moose per square mile or about 130 moose counted during the November survey. The SLWMA was last counted during December 2005 and yielded a count of 79 moose, the lowest count in over 20 years. The ratios observed were 12 bulls/100 cows and 9 calves/100 cows. Because the SLWMA is managed primarily for wildlife viewing, a second management objective requires that we maintain a minimum bull:cow ratio of 40 bulls/100 cows. The last permit hunt was held in 1999 when 40 permits were issued for antlerless and 20 for spike-fork antlered moose. The Department recommends maintaining the hunt, but not issuing permits for the fall 2010 season.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The SLWMA is a wintering area for moose. In the past, during moderate to severe winters, this area supported up to 300 moose, more than twice the desired resident population size. If resident moose are allowed to increase beyond the management objective, excessive use of the habitat will occur, affecting both resident and migratory moose that depend on this area. Viewing opportunities will be adversely affected as well.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** Since this is a proposal to re-authorize an existing hunt, no resource or product improvements are expected.

**WHO IS LIKELY TO BENEFIT?** Wildlife viewers and hunters receiving permits.

**WHO IS LIKELY TO SUFFER?** Individuals opposed to hunting.

**OTHER SOLUTIONS CONSIDERED?** Increase the moose carrying capacity of the area. Additional habitat enhancement is expensive and no projects are currently planned.

**PROPOSED BY:** Alaska Department of Fish and Game and the U. S. Fish and Wildlife Service

**LOG NUMBER:** HQ-10S-G-067

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**PROPOSAL 122 - 5 AAC 085.045.(13) Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose season in a portion of Unit 15(C).

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
(13) ... Unit 15(C), that portion south of the south fork of the Anchor River and northwest of Kachemak Bay		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or	Aug. 20 - Sept. 20 (General Hunt only)	Aug. 20 - Sept. 20
1 antlerless moose by drawing permit only; the taking of calves, and females accompa- nied by calves, is prohibited; up to 100 permits may be issued	Aug. 20 - Sept. 20	Aug. 20 - Sept. 20

...  
**ISSUE:** Antlerless moose seasons must be re-authorized annually. The Homer benchland in Unit 15(C) often holds high moose densities in winters when deep snow pushes the moose down into human populated areas. These deep snow winters result in a high number of moose dying due to malnutrition and increased negative interactions with humans as moose become more aggressive in their search for food around human residences.

In the fall of 2005, 441 moose were counted in the permit area and 26 percent were calves. Winters since the last count have been mild and moose numbers remain high. Fifty permits were issued in each of the last 8 years resulting in an average harvest of 23 cows per year. We recommend re-authorization of the antlerless hunt and anticipate issuing 50 permits for the fall 2010 hunt.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Deep snow winters will result in a high number of moose deaths due to malnutrition and continued conflicts between aggressive moose and humans.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** A limited antlerless moose hunt may improve overall browse quality.

**WHO IS LIKELY TO BENEFIT?** Wildlife viewers and hunters receiving permits.

**WHO IS LIKELY TO SUFFER?** Individuals opposed to hunting.

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-068

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**PROPOSAL 123 - 5 AAC 085.045(14). Hunting seasons and bag limits for moose.** Re-authorize the antlerless moose hunt on Kalgin Island in Unit 16(B).

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(14)		
...		
Unit 16(B), Kalgin Island		
1 moose per regulatory year, by registration permit only	Aug. 20 - Sept. 20	Aug. 20 - Sept. 20
...		

**ISSUE:** Antlerless moose hunts must be re-authorized annually. The population objective for this predator-free, 23-mi<sup>2</sup> island is 20-40 moose a density of 1-1.75 moose/mi<sup>2</sup>. Following a November 2007 survey, we counted 118 moose which is approximately 5.13 moose/mi<sup>2</sup>.

Because of concerns of over-population and deteriorating habitat conditions, a drawing permit hunt for cows was initiated in 1995. In an attempt to reduce the population quickly, the Board established a registration hunt for any moose for the fall 1999 season. The population of moose on Kalgin Island is high and has remained well above the objective of 20-40.

The "any moose" registration hunt is recommended to provide additional mortality on this predator-free island population. A registration hunt also allows the department to continue gathering biological information from specimens provided by successful hunters. The difficult hunting conditions and limited access will minimize the danger of over-harvest. Allowing the continued harvest of calves provides an additional management tool needed to reduce population productivity.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Without a liberal harvest including cows and calves, the population will continue to exceed the island’s carrying capacity, resulting in habitat damage and ultimately decline in moose numbers through starvation.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** If the island population size is kept at or near objective levels, moose will have adequate available forage and therefore, show less sign of being nutritionally stressed.

**WHO IS LIKELY TO BENEFIT?** Hunters who make the effort to get to Kalgin Island will have the opportunity to take any moose.

**WHO IS LIKELY TO SUFFER?** Seasonal residents of Kalgin Island have been concerned about hunters trespassing on their land and cabins. The current season dates concentrate hunter activity when most seasonal residents are present.

**OTHER SOLUTIONS CONSIDERED?** A general season for any moose will also work to lower moose densities, but would diminish the ability to collect biological information.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-069

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**PROPOSAL 124 - 5 AAC. 92.015 Brown bear tag fee exemptions.** Reauthorize the brown bear tag fee exemptions in Region II.

(a) A resident tag is not required for taking a brown bear in the following units:

- (1) Unit 11;
- (2) Unit 13 and 16(A), that portion outside of Denali State Park;
- (3) Unit 16(B);

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- (1) Unit 9(B);
- (2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);
- (3) Unit 17

**ISSUE:** Brown bear tag fee exemptions must be reauthorized annually.

In March of 2003 the Board liberalized brown bear hunting regulations including the tag fee exemption to increase the harvest of brown bears. In addition brown bear tags are not required for subsistence brown bear hunting in parts of Unit 9 and Unit 17. Continuation of the exemption is necessary to encourage hunters to take brown bears in these units.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** If the Board does not reauthorize the tag fee exemption the fee will be reinstated and hunters will not be able to legally harvest a bear unless they had purchased the tag. This action may likely reduce the incidental harvest of bears by other hunters (i.e. sheep and moose hunters) and direct potential brown bear hunters to other units.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** The goal by both the Board and the Department is to increase the harvest of brown bears to decrease the predation on moose calves. A tag fee exemption will help to achieve this goal.

**WHO IS LIKELY TO BENEFIT?** Hunters who incidentally encounter bears in these units that may be interested in harvesting one.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-076

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<b>REGION V – ARCTIC/WESTERN</b>
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**PROPOSAL 125 - 5 AAC 85.045(a)(21). Hunting seasons and bag limits for moose.**  
 Reauthorize the antlerless moose seasons in Unit 23, as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(21)

Unit 23, that portion north of and including the Singoalik River drainage

**RESIDENT HUNTERS:**

July 1 - Dec. 31

1 moose by registration permit only; however, antlerless moose may be taken only from Nov. 1-Dec. 31; a person may not take a calf or a cow accompanied by a calf; or

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side

Sept. 1 - Sept. 20

**NONRESIDENT HUNTERS:**

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 125 permits may be issued in all of Unit 23

Sept. 1 - Sept. 20

Remainder of Unit 23

**RESIDENT HUNTERS:**

Aug. 1 - Dec. 31

1 moose by registration permit only; however, antlerless moose may be taken only from Nov. 1-Dec. 31; a person may not take a calf

or a cow accompanied  
by a calf; or

1 bull with 50-inch antlers  
or antlers with 4 or more  
brow tines on one side

Sept. 1 - Sept. 20

NONRESIDENT HUNTERS: Sept. 1 - Sept. 20  
1 bull with 50-inch antlers or  
antlers with 4 or more brow tines  
on one side by drawing permit  
only; up to 125 permits may  
be issued in all of Unit 23

**ISSUE:** To be retained, antlerless moose seasons must be reauthorized annually. Moose density is currently low in large portions of Unit 23. As a result, in November 2003 the BOG restricted moose hunting for resident and nonresident hunters. These restrictions substantially shortened the resident antlerless moose season and limited the harvest of antlerless moose to hunters who register for registration permit hunt RM880. In November 2005 and 2007, the BOG considered public proposals and made no changes to the moose hunting seasons in Unit 23. Historically, the reported harvest of cow moose has been low throughout Unit 23 despite liberal antlerless seasons. We do not think maintaining an antlerless season during November and December, when moose harvests tend to be low, will endanger Unit 23 moose populations.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunting opportunity will be needlessly lost.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** NA.

**WHO IS LIKELY TO BENEFIT?** Resident hunters who need to harvest an antlerless moose when caribou or other game is unavailable.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-074

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**PROPOSAL 126 - 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose season in Unit 26A, as follows:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(24)		
Unit 26(A), that portion in the Colville River drainage upstream from and including the Anaktuvuk River drainage		
1 bull; or	Aug. 1 – Sept. 14	No open season.
1 bull by drawing permit only; up to 40 permits may be issued; up to 20 percent of the permits may be issued to nonresident hunters; or	Sept 1 – Sept. 14	Sept 1 – Sept. 14
1 moose; a person may not take a calf or a cow accompanied by a calf	Feb. 15 – Apr. 15	No open season.
Unit 26(A), that portion west of 156° 00' W. longitude excluding the Colville River drainage		
1 moose; a person may not take a calf or a cow accompanied by a calf	July 1 – Sept 14	No open season.

...

**ISSUE:** To be retained, antlerless moose seasons must be reauthorized annually. Two areas in Unit 26(A) are considered by this proposal: 1) the Colville River drainage upstream from and including the Anaktuvuk River drainage; and 2) the portion of Unit 26(A) west of 156 00' W longitude and north of the Colville drainage.

Within the ‘upstream’ portion of the Colville River drainage, a winter hunt was established by the Board in November 2005 and opened in the 2005-2006 regulatory year to provide more hunting opportunity in an area where the moose population is increasing in Unit 26(A). Since most bull moose shed their antlers before the established season opening of February 15, the bag limit for this hunt is one moose, except a calf or cow accompanied by a calf may not be taken. In

this antlerless hunt area, the moose population is currently declining due, primarily, to low calf survival. However, the low number of cows harvested in the winter season has little impact on the population. In recent years harvests have been: 2 cows in 2006, 3 cows in 2007, 1 cow in 2008, and no cows in 2009. A similar low harvest is anticipated for the current regulatory year (2010 hunt in progress Feb 15-Apr 15). Low harvests of antlerless moose (<10 per year) in the Colville River drainage should have little effect on the population and we recommend reauthorization of the antlerless moose season in this area.

The portion of Unit 26(A) west of 156 00' W longitude and north of the Colville drainage has a sparse distribution of moose. Each year a small percentage of moose (primarily bulls and cows without calves) disperse away from the major river drainages and across the coastal plain. These moose provide the only opportunities for harvest in the northwestern portion of Unit 26(A). Although the moose population in the unit is declining, the small number of cow moose that disperse and could be harvested under this reauthorization proposal will have very little impact on the population.

To date, after several years of hunting, few antlerless moose have been harvested in this portion of the unit. One cow was harvested in 2006, none in 2007, 1 in 2008, and none in 2009 during this hunt. We recommend reauthorization of the antlerless moose season in this portion of Unit 26(A).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunting opportunity will be needlessly lost.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** N/A.

**WHO IS LIKELY TO BENEFIT?** Resident hunters who need to harvest an antlerless moose when caribou or other game is unavailable.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-075

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**PROPOSAL 127** - 5 AAC 85.045(a)(20). **Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 22C and the remainder of Unit 22D, as follows:

<b>Units and Bag Limits</b>	<b>Resident Open Season (Subsistence and General Hunts)</b>	<b>Nonresident Open Season</b>
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(20)

...

Unit 22(C)

RESIDENT HUNTERS:

1 bull by registration permit only, or Sept. 1-Sept. 14

1 antlerless moose by registration permit only; or Sept. 15-Sept. 30

1 antlered bull by registration permit only; during the period Jan. 1 – Jan. 31, a season may be announced by emergency order Jan. 1 – Jan. 31 (to be announced)

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side by registration permit only Sept. 1-Sept. 14

...

Remainder of Unit 22(D)

RESIDENT HUNTERS:

1 moose; however, antlerless moose may be taken only from Dec. 1—Dec. 31; a person may not take a calf or a cow accompanied by a calf; only antlered moose may be taken from Jan. 1—Jan. 31 Aug. 10 - Sept. 14 Oct. 1 - Jan. 31

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side, by registration permit only. Sept. 1 - Sept. 14

...

**ISSUE:** To be retained, antlerless moose seasons must be reauthorized annually. Two areas in Unit 22 require reauthorization: Unit 22(C), and the Remainder of Unit 22(D).

In October 1999, the Board authorized a registration hunt for antlerless moose in Unit 22(C) and the department manages this hunt with a quota of up to 30 permits annually. The intent of the hunt is stabilization of the Unit 22(C) moose population, which is believed to be at or near carrying capacity of its winter range.

The Unit 22(C) moose population grew steadily throughout the 1990s and the current population is estimated at 620 moose, which exceeds the departments' management goal of 450–525 moose. Calf crop and yearling recruitment is high and generally exceeds 20 percent annually. However, the bull:cow ratio is low, varying between 10–20 bulls:100 cows. The low bull:cow ratio makes additional bull harvest ill-advised. It appears that the antlerless hunt has helped stabilize moose numbers in Unit 22(C) and we recommend reauthorizing the antlerless moose hunt to achieve the moose population objectives for this unit.

In most other parts of Unit 22, low recruitment rates are believed to be causing moose population declines. However, in the Remainder of Unit 22 (D) we recommend continued authorization of antlerless moose hunting where moose populations are stable and hunting pressure is low. This portion of Unit 22(D) is relatively remote with difficult access and these factors contribute to limited hunting pressure in the area. The estimated number of moose has been stable since 1997 and composition surveys typically show higher calf:cow and calf:adult ratios than other parts of Unit 22, except Unit 22(C). A 2006 geo-spatial population estimation process completed in Unit 22(D) Remainder estimated the population at 599 moose with a calf:adult ratio of 35 calves:100 adults. The reported cow harvest in this area has been low, averaging 1 cow moose per year since 1997. Village harvest survey data (collected only in 2000-2001) shows 5 cow moose were harvested from Unit 22(D) Remainder, which is a more realistic estimate of annual cow harvest compared to harvest ticket reports. Low harvest rates of antlerless moose support our recommendation to reauthorize antlerless moose seasons in the Remainder of Unit 22(D).

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Hunting opportunity for antlerless moose in portions of Unit 22 will be needlessly lost.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** All hunters who wish to harvest an antlerless moose.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-073

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**PROPOSAL 128 - 5 AAC 92.015(a) (8) & (9) and 92.015 (b) (4), (7), (8) & (10) Brown bear tag fee exemptions.** Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

(a) A resident tag is not required for taking a brown bear in the following units:

- ...
- (8) Unit 22;
- (9) Unit 23;
- ...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

- ...
- (4) Unit 18;
- ...
- (7) Unit 22;
- (8) Unit 23;
- ...
- (10) Unit 26(A).

**ISSUE:** The Board must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. We recommend continuing resident tag fee exemptions for the general season and subsistence season hunts in Region V (Units 18, 22, 23, and 26A).

**General Season Hunts:** Reauthorizations are needed for: Unit 22, where the tag fee has been exempted for 8 years, and Unit 23, where the tag fee has been exempted for 4 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest, 2) opportunistic harvest by resident hunters, and 3) harvest by a wide range of users. Increased harvest is allowable because portions of these units have high bear populations.

General season brown bear harvest rates are within sustained yield limits and exempting the resident tag fee has not caused dramatic or unexpected increases in overall harvest. In Unit 22, during the tag-free period resident harvest has a 8-year average annual harvest of 41 bears, although during this period other regulatory changes were implemented and contributed to increased harvest. In Unit 23, general harvests have increased slowly since 1961 although there has been substantial annual variability in harvest levels. The increasing trend in overall harvest is probably most influenced by the increasing human population in Alaska rather than the result of regulatory changes. Annual variability in harvests is probably most affected by weather. Harvest data for Unit 23 show no trend in the sex ratio, age or size of bears harvested under all types of hunts.

**Subsistence Season Hunts:** Reauthorizations are needed for Units 18, 22, 23, and 26(A) where brown bear subsistence hunt requirements include: 1) registration permit, 2) tag fee exemption, 3) salvaging meat for human consumption, 4) no use of aircraft in Units 22, 23 and 26(A), 5) no

sealing requirement unless hide and skull are removed from subsistence hunt area, and 6) if sealing is required, the skin of the head and front claws must be removed and retained by the department at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by the department for subsistence hunts.

In all Units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, we estimate 1-3 bears are taken annually in subsistence hunts. In Unit 22, 6 bears have been reported harvested during the previous 10-year period and this is <1 percent of the total brown bear harvest in the unit. In Unit 23, an average of <5 bears have been harvested annually since 1992 and this is  $\leq$  10 percent of the total brown bear harvest. In Unit 26(A), very few bears are taken annually by subsistence hunters.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The tag fee exemption will lapse and hunters will be required to purchase \$25 tags for general season and subsistence hunts. The brown bear harvest will decline.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?** N/A

**WHO IS LIKELY TO BENEFIT?** Residents who are reluctant or unable to purchase the \$25 tag before hunting will be able to opportunistically and legally harvest a brown bear.

**WHO IS LIKELY TO SUFFER?** No one.

**OTHER SOLUTIONS CONSIDERED?** None.

**PROPOSED BY:** Alaska Department of Fish and Game

**LOG NUMBER:** HQ-10S-G-078

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