

ALASKA BOARD OF GAME

Interior Region Meeting

Fairbanks, Alaska

March 2 – March 11, 2012

Advisory Committee On Time Comment Summary

SUPPORT	COMMENT	OPPOSE
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133 Open resident hunting seasons one week before nonresident seasons in all intensive management areas in Region III.

Yukon Flats AC08 Fairbanks w/Am. AC14		40 Mile/Upper Tanana AC02 Anchorage AC04 Eagle AC12 Matanuska Valley AC18
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134 For Region III Units, allocate 10 percent of drawing permits to nonresidents; restrict nonresident participation in hunts with less than 10 permits.

Anchorage AC04		40 Mile/Upper Tanana AC02 Fairbanks AC14 Matanuska Valley AC18
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135 For Region III Units, limit drawing permits to 10 percent for out of state hunters, 90 percent for residents.

Anchorage AC04 Fairbanks AC14		40 Mile/Upper Tanana AC02 Matanuska Valley AC18
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SUPPORT	COMMENT	OPPOSE
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RC67

136 Begin the resident hunting season for Dall sheep seven days earlier than nonresidents in Region III Units.

Middle Nenana AC22		
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137 Convert nonresident sheep seasons to draw only hunts, require guide-client agreement and cap harvest at 15-20% of allowable harvest.

	Anchorage AC04	40 Mile/Upper Tanana AC02 Fairbanks AC14 Matanuska Valley AC18
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138 Convert all sheep hunts in Region III to drawing only, 90% for residents.

		40 Mile/Upper Tanana AC02 Fairbanks AC14 Matanuska Valley AC18
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139 Convert all nonresident sheep seasons to drawing permit hunts and limit to 5 percent of total permits.

Middle Nenana AC22		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18
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140 Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

40 Mile/Upper Tanana AC02 Anchorage AC04 Delta AC09 Eagle AC12 Fairbanks AC14		Craig AC19
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SUPPORT	COMMENT	OPPOSE
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RC67

Koyukuk River AC17 Matanuska Valley AC18 Middle Nenana AC22 Minto Nenana AC23		
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141 Implement black bear trapping regulations.

40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14 Matanuska Valley w/Am. AC18 McGrath AC20 Minto Nenana w/Am. AC23		Yukon Flats AC08 Eagle AC12 Koyukuk River AC17
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142 Prohibit trapping of black bear in the Interior region.

Matanuska Valley AC18		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14
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144 Allow for same day airborne hunting or black bear over bait.

40 Mile/Upper Tanana AC02 Anchorage AC04 Delta AC09 Fairbanks AC14 Matanuska Valley AC18		Eagle AC12
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SUPPORT	COMMENT	OPPOSE
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RC67

143 Allow the taking of black bear at bait stations the same day you have been airborne.

40 Mile/Upper Tanana AC02 Anchorage AC04 Delta AC09 Fairbanks AC14 Matanuska Valley AC18	Eagle AC12 Minto Nenana AC23	Eagle AC12
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145 Develop a Unit specific Amount Needed for Subsistence (ANS) finding for wolves in the Interior Region.

Craig AC19 Minto Nenana AC23	Fairbanks AC14	40 Mile/Upper Tanana AC02 Anchorage AC04 Eagle AC12 Matanuska Valley AC18
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146 Open year-round coyote seasons in Region III.

40 Mile/Upper Tanana w/Am AC02 Anchorage AC04 Denali AC11 Eagle AC12 Fairbanks AC14 Matanuska Valley w/Am. AC18 Middle Nenana AC22		
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147 Allow the use of helicopters for access to trapping in Region III.

Fairbanks AC14	Anchorage AC04	Yukon Flats AC08 Delta AC09 Middle Nenana AC22
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SUPPORT	COMMENT	OPPOSE
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RC67

148 Close certain nonresident trapping seasons in the Interior Region.

		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14 Middle Nenana AC22
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149 Extend the season for fox, martin, mink, and weasel in Units 12, 20, &25C.

40 Mile/Upper Tanana w/Am AC02 Fairbanks w/Am. AC14	Anchorage AC04	Delta AC09
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150 Close certain nonresident furbearer hunting seasons in the Interior Region.

		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14 Middle Nenana AC22
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151 Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meet the original intent.

40 Mile/Upper Tanana w/Am AC02 Anchorage AC04 Middle Nenana AC22	Fairbanks AC14	G.A.S.H. AC01 Koyukuk River AC17 McGrath AC20
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152 Open early youth hunt (10-17 years) for all big game in Region III Units; require accompanying adult to forfeit bag limit.

		40 Mile/Upper Tanana AC02 Anchorage AC04 Delta AC09
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SUPPORT	COMMENT	OPPOSE
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RC67

		Fairbanks AC14
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153 Eliminate the requirement to pick up moose registration permits weeks or months prior to the season in remote villages in Regions III. Make all registration permits available in season from designated vendors.

Anchorage AC04 Fairbanks AC14		McGrath AC20 Middle Nenana AC22
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McGrath Area – Units 19, 21A, & 21E

154 Reauthorize antlerless moose hunting seasons in Unit 19D.

Delta AC09 McGrath AC20	Fairbanks AC14	Anchorage AC04
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155 Close certain caribou hunts in Units 19A, 19B, 19C, 19D, 21A, and 21E.

	Fairbanks AC14	G.A.S.H. AC01 Anchorage AC04 McGrath AC20
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156 Close the nonresident season for caribou in parts of Unit 19.

		Anchorage AC04
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131 Expand predator control plan for bears in Unit 19A..

Central Peninsula AC05 McGrath AC20		
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SUPPORT	COMMENT	OPPOSE
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RC67

157 Amend the Mulchatna Caribou Herd Predation Management Plan

Anchorage AC04 McGrath AC20	Fairbanks AC14	
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158 Establish a predator control plan for the range of the Mulchatna Caribou Herd.

	Anchorage AC04	
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159 Modify the population objective for Mulchatna caribou.

	Anchorage AC04	
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160 Extend the lynx trapping season in Unit 19.

Anchorage AC04 Fairbanks w/Am. AC14 McGrath AC20		
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Galena Area – Units 21B, 21C, 21D and 24

161 Split the moose drawing permit hunt in Unit 21D (DM817) into two drawing permit seasons.

Anchorage AC04 Middle Yukon AC25		Ruby AC24
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SUPPORT	COMMENT	OPPOSE
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RC67

162 Allow 10% of the Koyukuk CUA permit winners to use aircraft; allow guided permit winners to choose either boat or aircraft.

Ruby w/Am AC24		Anchorage AC04 Fairbanks AC14 Koyukuk River AC17 Middle Yukon AC25
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163 Authorizes a predator control program in a small portion of Unit 24B.

Anchorage AC04 Fairbanks AC14 Koyukuk River AC17 Ruby AC24 Middle Yukon AC25		
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164 Eliminate the aircraft restriction in the Kanuti Controlled Use Area.

Anchorage AC04 Fairbanks AC14		Koyukuk River AC17 Ruby AC24 Middle Yukon AC25
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165 Close all hunting for the Galena Mountain Caribou Herd in Unit 24.

Craig AC19 Middle Yukon AC25		Anchorage AC04 Fairbanks AC14 Koyukuk River AC17 Ruby AC24
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SUPPORT	COMMENT	OPPOSE
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RC67

167 Lengthen wolf hunting season to the end of May for Units 21, 22, and 24.

Anchorage AC04 Fairbanks AC14 Koyukuk River AC17 Ruby AC24 Middle Yukon AC25		
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166 Lengthen the wolf hunting season for residents and nonresidents in Unit 21.

Anchorage AC04 Ruby AC24 Middle Yukon AC25		Fairbanks AC14
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168 Allow brown bears to be harvested with bait in Unit 21D.

Anchorage AC04 Fairbanks w/Am. AC14 Koyukuk River AC17 Ruby AC24 Middle Yukon AC25		
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169 Extend the lynx trapping season in Unit 21.

G.A.S.H. AC01 Anchorage AC04 Fairbanks AC14 McGrath AC20 Ruby AC24		Koyukuk River AC17 Middle Yukon AC25
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SUPPORT	COMMENT	OPPOSE
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RC67

Northeast Alaska – Units 25A, 25B, 25D, 26B and 26C

170 Shorten the moose season in a portion of 25A.

Yukon Flats AC08	Anchorage AC04	Fairbanks AC14
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171 Require meat-on-bone salvage for moose in Unit 25A.

Anchorage AC04 Yukon Flats AC08 Eagle AC12		Fairbanks AC14
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172 Require meat-on-bone salvage for moose in Unit 25B.

Anchorage AC04 Yukon Flats AC08 Eagle AC12		Fairbanks AC14
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173 Require meat-on-bone salvage for moose in Unit 25D.

Anchorage AC04 Yukon Flats AC08 Eagle AC12		Fairbanks AC14
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174 Establish a registration hunt for moose in the Firth/Mancha River drainage in Unit 26C.

Anchorage AC04		Craig AC19
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SUPPORT	COMMENT	OPPOSE
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RC67

175 Increase the nonresident bag limit for Porcupine Herd caribou in Units 25B, 25D, 26C, and the eastern portion of Unit 25A.

Anchorage AC04 Fairbanks AC14		Yukon Flats AC08
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176 Return the nonresident bag limit on Porcupine Herd caribou to two bulls.

Anchorage AC04		Fairbanks AC14
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177 Decrease the bag limit for caribou in Unit 26B.

	Anchorage AC04	Fairbanks AC14
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262 Require hunter education for sheep hunters in the Red Sheep and Cane Creek drainages.

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178 Close Red Sheep Creek and Cane Creek drainages to hunting for sheep.

Yukon Flats w/Am. AC08		Anchorage AC04 Fairbanks AC14
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179 Convert the general season nonresident sheep hunt to drawing hunt in the Dalton Highway Corridor area

Anchorage AC04 Koyukuk River AC17		Fairbanks AC14 Matanuska Valley AC18
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SUPPORT	COMMENT	OPPOSE
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RC67

180 Open wolf trapping in Units 25A, B, and C earlier, starting October 1.

Anchorage AC04 Yukon Flats AC08 Fairbanks w/Am. AC14 Craig AC19		
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181 Extend brown bear seasons in Unit 26B.

Anchorage AC04 Fairbanks AC14		
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182 Increase the annual bag limit for black bear in Unit 25D.

Anchorage AC04 Yukon Flats AC08 Fairbanks AC14 Craig AC19		
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183 Allow hunters to take more than one brown bear by community harvest permit in Unit 25D.

Anchorage AC04 Yukon Flats w/Am AC08 Fairbanks AC14		
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184 Allow the use of crossbows in the Dalton Highway Corridor Management Area.

Fairbanks AC14		Anchorage AC04 Koyukuk River AC17
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SUPPORT	COMMENT	OPPOSE
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RC67

185 Allow the taking of small game by falconry in the Dalton Highway Corridor Management area.

Anchorage AC04 Fairbanks AC14		
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Tok Area – Units 12 & 20E

186 Modify moose season in portion of Unit 12 and 11.

40 Mile/Upper Tanana w/Am AC02 Anchorage AC04 Copper Basin w/Am. AC07 Tok Cutoff/Nabesna Road w/Am. AC15	Fairbanks AC14	
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187 Convert the any bull moose hunt to a spike-fork 50-inch or 3 or more brow tines in portion of Unit 12.

	Anchorage AC04 Fairbanks AC14	Tok Cutoff/Nabesna Road AC10
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188 Allocate 10 percent of sheep drawing permits to nonresidents.

		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14
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189 Close the nonresident sheep season in the Tok and Delta drawing hunts.

Fairbanks AC14		40 Mile/Upper Tanana AC02 Anchorage AC04
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SUPPORT	COMMENT	OPPOSE
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RC67

190 Close nonresident sheep season in the Tok and Delta drawing hunts.

Fairbanks AC14 Middle Nenana AC22		40 Mile/Upper Tanana AC02 Anchorage AC04
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191 Extend the moose season and restrict the harvest to larger bulls in Unit 20E.

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192 Combine Fortymile and White Mountains Caribou herd seasons under 1 registration permit, remove harvest limits, lengthen the winter season for residents, and allow a new limited registration permit hunt.

40 Mile/Upper Tanana AC02 Anchorage AC04 Eagle AC12 Fairbanks AC14 Matanuska Valley AC18		
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193 Move the Fortymile caribou season start date back to August 10, close corridor within one mile of highways during fall season.

Craig AC19		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14
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194 Open a youth only hunt for Fortymile Caribou.

		40 Mile/Upper Tanana AC02 Anchorage AC04 Fairbanks AC14
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SUPPORT	COMMENT	OPPOSE
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RC67

		Matanuska Valley AC18
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195 Prohibit proxy hunting for all Fortymile and White Mountain caribou hunts in Units 20B, 20D, 20E, 20F and 25C.

40 Mile/Upper Tanana AC02 Anchorage AC04 Eagle AC12 Fairbanks AC14 Matanuska Valley AC18 Craig AC19		
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196 Allow brown bear baiting with same season and restrictions as black bear baiting.

40 Mile/Upper Tanana AC02 Anchorage AC04 Delta AC09 Eagle AC12 Fairbanks w/Am. AC14 Matanuska Valley AC18		
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197 Re-Implement the grizzly bear control portion of the UYTPCP in Southern Unit 20E, and allow bear snaring and same day airborne taking of bears.

Anchorage AC04 Eagle AC12 Matanuska Valley AC18		
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198 Align the Unit 12 and 20E fox trapping season with the coyote season, including snare and trap restrictions in October and April.

40 Mile/Upper Tanana AC02		
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SUPPORT	COMMENT	OPPOSE
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RC67

Anchorage AC04 Eagle AC12 Fairbanks w/Am. AC14 Matanuska Valley AC18		
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199 Extend hunting seasons for lynx and fox to April 30.

40 Mile/Upper Tanana AC02 Anchorage AC04 Eagle AC12 Fairbanks w/Am. AC14 Matanuska Valley AC18		Delta AC09
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200 Amend the Amount Reasonably Necessary for Subsistence Uses for wolves in Unit 12.

	Fairbanks AC14	40 Mile/Upper Tanana AC02 Anchorage AC04 Matanuska Valley AC18
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Delta Area – Unit 20D

201 Reauthorize antlerless moose hunting seasons in Unit 20D.

Delta AC09 Eagle AC12 Fairbanks AC14 Matanuska Valley AC18		Anchorage AC04
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SUPPORT	COMMENT	OPPOSE
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RC67

202 Allow assistance from same-day-airborne for Delta bison permit holders

40 Mile/Upper Tanana AC02 Anchorage AC04 Delta AC09	Fairbanks AC14	Matanuska Valley AC18
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203 Restrict the use of all motorized vehicles in portion of 20D.

		Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18
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Fairbanks Area - Unit 20A, 20B, 20C, 20F, & 25C

204 Modify the Intensive Management findings for moose in Unit 20A.

Fairbanks w/Am. AC14		Matanuska Valley AC18
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205 Change the legal animal for the Unit 20A & 20B antlerless hunts.

		Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18 Middle Nenana AC22
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206 Reauthorize the antlerless moose hunting season in Unit 20A.

Delta AC09 Denali AC11 Fairbanks w/Am. AC14		Anchorage AC04
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SUPPORT	COMMENT	OPPOSE
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RC67

Koyukuk River AC17 Matanuska Valley AC18 Minto Nenana AC23		
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207 Revert to the original hunt area for the November muzzleloader hunt in Unit 20A.

Anchorage AC04	Fairbanks AC14	Matanuska Valley AC18
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208 Establish a new muzzleloader hunt in Remainder of Unit 20A; outside the controlled use area.

	Fairbanks AC14	Anchorage AC04 Matanuska Valley AC18
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209 Require hunters to use a locking tag if hunting any bull drawing permit in Unit 20A.

Anchorage AC04 Middle Nenana AC22	Fairbanks AC14	Matanuska Valley AC18
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210 Move the northern boundary of the Wood River Controlled Use Area.

Anchorage AC04 Matanuska Valley AC18	Fairbanks AC14	Middle Nenana AC22
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211 Prohibit the use of ATVs above 2500 feet elevation in a portion of Unit 20.

	Fairbanks AC14	Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18
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SUPPORT	COMMENT	OPPOSE
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RC67

212 Prohibit the use of ATVs in a portion of Unit 20.

Middle Nenana AC22	Fairbanks AC14	Anchorage AC04 Matanuska Valley AC18
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213 Allow motorized vehicle access in the Yanert Controlled Use Area in Unit 20.

Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18		Denali AC11 Middle Nenana AC22
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214 Create an "any ram" drawing permit hunt in Unit 20.

Middle Nenana AC22	Denali AC11	Anchorage AC04 Delta AC09 Fairbanks AC14 Matanuska Valley AC18
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216 Open a general season bull hunt 10 days earlier in the Minto Flats Management Area; convert the winter any moose hunt to antlerless and issue unlimited permits.

Fairbanks w/Am. AC14 Matanuska Valley AC18 Minto Nenana w/Am. AC23		Anchorage AC04
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215 Establish a community harvest hunt area for the Village of Minto in Unit 20.

Minto Nenana AC23	Fairbanks AC14	Matanuska Valley AC18
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SUPPORT	COMMENT	OPPOSE
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RC67

217 Establish a community harvest permit hunt for the Village of Minto.

	Fairbanks AC14	Matanuska Valley AC18
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218 Reauthorize the antlerless moose hunting season in Unit 20B.

Delta AC09 Fairbanks w/Am. AC14 Koyukuk River AC17 Matanuska Valley AC18 Minto Nenana AC23		Anchorage AC04
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219 Eliminate the Minto Flats Management Area restrictions on airboats.

Anchorage AC04 Matanuska Valley AC18		Fairbanks AC14 Minto Nenana AC23
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220 Lengthen the muzzleloader season in Unit 20B, Creamers Refuge, and expand the hunt area to all of the Fairbanks Management area.

		Fairbanks AC14 Matanuska Valley AC18
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221 Lengthen the muzzleloader season in Unit 20B, Creamers Refuge.

Fairbanks AC14 Matanuska Valley AC18		
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SUPPORT	COMMENT	OPPOSE
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RC67

222 Modify the muzzleloader hunt area to prohibit harvest of antlerless moose in the Salcha River drainage.

Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18		
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223 Modify the muzzleloader hunt to prohibit harvest of antlerless moose in the Salcha River drainage.

Anchorage AC04 Matanuska Valley AC18	Fairbanks AC14	
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224 Review the boundary of the Fairbanks Management Area; focus on changing the boundary near Murphy Dome and Ester Dome.

Matanuska Valley AC18	Fairbanks AC14	
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225 Remove the prohibition on aircraft use for beaver trapping in the Minto Flats management area.

Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18		
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229 Adopt an Intensive Management plan for Unit 20C.

Anchorage AC04 Tanana / Rampart / Manley AC13 Fairbanks AC14 Matanuska Valley AC18		Middle Nenana AC22
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SUPPORT	COMMENT	OPPOSE
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RC67

227 Establish an intensive management area for Unit 20C.

Anchorage AC04 Tanana / Rampart / Manley AC13 Fairbanks AC14 Matanuska Valley AC18		Middle Nenana AC22
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228 Adopt a wolf control program for Unit 20C.

Anchorage AC04 Tanana / Rampart / Manley AC13 Fairbanks AC14 Matanuska Valley AC18		Middle Nenana AC22
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230 Adopt a bear control program for Unit 20C.

Anchorage AC04 Tanana / Rampart / Manley AC13 Fairbanks w/Am. AC14 Matanuska Valley AC18		Middle Nenana AC22
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226 Align the resident and nonresident moose seasons in Unit 20C.

Middle Nenana AC22	Fairbanks AC14	Anchorage AC04 Matanuska Valley AC18
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231 Establish a black bear trapping season in parts of Unit 20C.

Anchorage AC04 Fairbanks AC14		Middle Nenana AC22
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SUPPORT	COMMENT	OPPOSE
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RC67

Matanuska Valley AC18		
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232 Allow harvest of grizzly bear over a black bear bait site; require salvage of meat and hide

Anchorage AC04 Fairbanks w/Am. AC14 Matanuska Valley w/Am. AC18		Middle Nenana AC22
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233 Establish a new controlled use area near Denali.

		Anchorage AC04 Delta AC09 Fairbanks AC14 Matanuska Valley AC18 Middle Nenana AC22
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234 Require meat-on-bone salvage for moose in Unit 25C.

Anchorage AC04		Fairbanks AC14 Matanuska Valley AC18
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235 Increase the bag limit for black bear in Unit 25C.

Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18		
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SUPPORT	COMMENT	OPPOSE
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RC67

236 Allow limited harvest of grizzly bear at black bear bait stations in Units 20A, 20B and 25C.

Anchorage AC04 Fairbanks w/Am. AC14 Matanuska Valley w/Am. AC18		
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237 Align the brown/grizzly season in all of Unit 20.

Anchorage AC04 Fairbanks AC14 Matanuska Valley AC18		
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STATEWIDE

40 Allow nonresident falconers to capture raptors in Alaska.

		Mat Valley AC18
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44 Modify the ADF&G discretionary authority for Governor's tags.

Copper Basin AC07		
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46 Allow the sale of big game trophies.

Denali AC11 Mat Valley AC18		
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SUPPORT	COMMENT	OPPOSE
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RC67

47 Allow the sale of big game trophies.

		Mat Valley AC18
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109 Clarify and remove complicated and restrictive regulations and ADF&G discretionary provisions pertaining to black bear hunting.

Mat Valley AC18		Eagle AC12 Middle Nenana River AC22
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259 Modify the salvage and sealing requirements for black bear regulations statewide.

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119 Establish a codified location for permitted black bear bait stations and establish seasons for all of Alaska.

Mat Valley AC18		Eagle AC12
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REGION IV—CENTRAL/SOUTHWEST

238 Implement a predation management plan in Unit 9B.

Anchorage AC04 Matanuska Valley AC18	Fairbanks AC14	
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260 Modify brown bear seasons in Unit 9B.

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SUPPORT	COMMENT	OPPOSE
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RC67

261 Modify brown bear seasons in Unit 9C.

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245 Reauthorize antlerless moose hunt in Unit 13.

Copper Basin AC07 Tok Cutoff/Nabesna Road AC10 Denali AC11 Matanuska Valley AC18 Matanuska Valley AC18 Delta AC09		Anchorage AC04
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246 Reauthorize antlerless moose hunt in Unit 14A.

Delta AC09		Anchorage AC04
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254 Reauthorize antlerless moose hunt in Unit 16B, Kalgin Island.

Central Peninsula AC05 Kenai/Soldotna AC06 Matanuska Valley AC18		Anchorage AC04
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255 Reauthorize brown bear tag fees in Region IV.

Anchorage AC04 Copper Basin AC07 Tok Cutoff/Nabesna Road AC10 Fairbanks AC14 Matanuska Valley AC18		
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SUPPORT	COMMENT	OPPOSE
		RC67

REGION I--SOUTHEAST

239 Reauthorize antlerless moose hunt in Unit 1C, Berners Bay

Delta AC09 Matanuska Valley AC18 Juneau Douglas AC21	Fairbanks AC14	Anchorage AC04
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240 Reauthorize antlerless moose hunt in Unit 1C, Gustavus

Matanuska Valley AC18 Juneau Douglas AC21 Delta AC09		Anchorage AC04
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241 Reauthorize antlerless moose hunt in Unit 5A, Nunatak Bench

Matanuska Valley AC18 Delta AC09		Anchorage AC04
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REGION II—SOUTHCENTRAL

242 Reauthorize antlerless moose hunt in Unit 6A.

Copper River/Prince William Sound AC03 Matanuska Valley AC18 Delta AC09		Anchorage AC04
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SUPPORT	COMMENT	OPPOSE
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RC67

243 Reauthorize antlerless moose hunt in Unit 6B.

Copper River/Prince William Sound AC03 Matanuska Valley AC18 Delta AC09		Anchorage AC04
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244 Reauthorize antlerless moose hunt in Unit 6C.

Copper River/Prince William Sound AC03 Matanuska Valley AC18 Delta AC09		Anchorage AC04
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247 Reauthorize antlerless moose hunt in Units 7/14C Placer-20mile.

Matanuska Valley AC18 Delta AC09		Anchorage AC04
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248 Reauthorize antlerless moose hunt in Unit 14C.

Matanuska Valley AC18 Delta AC09		Anchorage AC04
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249 Reauthorize antlerless moose hunt in Unit 14C, Anchorage Mgt. Area.

Matanuska Valley AC18 Delta AC09		Anchorage AC04
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SUPPORT	COMMENT	OPPOSE
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RC67

250 Reauthorize antlerless moose hunt in Unit 14C, Birchwood and remainder.

Matanuska Valley AC18 Delta AC09		Anchorage AC04
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251 Reauthorize antlerless moose hunt in Unit 14C, Ship Creek.

Matanuska Valley AC18 Delta AC09		Anchorage AC04
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252 Reauthorize antlerless moose hunt in Unit 15A, Skilak Loop.

Central Peninsula AC05 Kenai/Soldotna AC06 Matanuska Valley AC18 Delta AC09		Anchorage AC04
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253 Reauthorize antlerless moose hunt in Unit 15C, Homer.

Central Peninsula AC05 Kenai/Soldotna AC06 Delta AC09 Homer w/Am. AC16 Matanuska Valley AC18		Anchorage AC04
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RC68

From: "Katherine Schake" <kaschake@yahoo.com>
To: <nancy@denalicitizens.org>
Sent: Saturday, March 03, 2012 8:58 AM
Subject: Comments on Proposal 213 and 227-232

Hi Nancy,

I just received your email, and would like to comment on Proposals 213 and 227-232. I have copy-pasted my comments below. If you receive this email in time, it would be great if you could share some of my comments.

Thanks for all of the work you do!

-Katherine Schake

I am writing because I oppose Proposal 213 and Proposal 227-232. I am soon to be a year-round resident of the Denali Borough, with the Yanert Valley, Unit 20A in my backyard. I do not want the noise, the traffic, nor the rutted trails that result from the use of motorized vehicles in my backyard. I am moving to the Denali Borough for peace, quiet, and trail-less terrain. I highly value non-motorized hunting and am proud to live near one of the last remaining non-motorized hunting units in Alaska. Please do not go forward with Proposal 213 and keep the Yanert Valley as a non-motorized hunting area.

I am in opposition of Proposal 227-232 because I believe it to be poor game management technique. I have worked as a Naturalist in Denali National Park for many seasons, and am familiar with the wolf packs scattered in the park. Visitors to the park highly value wolf-sightings. Many of the wolves who live in Denali National Park will venture north, into Unit 20C during the winter. Encouraging predator control in Unit 20C, simply so that people can hunt more moose is unwise. This ecosystem is currently healthy, with stable wildlife populations. I am concerned that if Proposal 227-232 is passed, then we will be tampering with wildlife populations in ways that may have unintended consequences. This is poor game management, to tamper with populations because people want more game for themselves. This approach may be harmful to the wildlife populations, the overall ecosystem, and deplete a resource (wildlife viewing) that brings thousands of people from out of state every summer to Denali National Park.

Sincerely,
Katherine Schake

Proposal 141. Summary of regulations changes the Board may wish to consider if trapping for black bears is allowed as a furbearer.

Topic	Recommend	Regulation
The Trapper		
Register with the Department	Yes	92.0xx
Minimum Age	16	92.0xx & 92.051
Methods of Take	Bucketsnare/Centerfire	92.095
Trap Check	2 days	92.0xx
Same-day Airborne	300 ft	92.095
Commercial Uses	limit	90.0xx
The Bears		
Salvage	Hide or meat	92.220
Sale of Meat	No	92.200
Biological Specimens	Yes	92.095
Sealing Hides for Sale	Yes	92.165
Incidentally Caught Brown Bears	Yes	92.0xx
Trapping Cubs	Yes	92.260
Un-captured Bears near Traps	Yes	?
Trapping Sites		
Site Maintenance	Same as hunting	92.0xx
Prohibited Trapping Locations	Same as hunting	92.095
Artificial light	Yes	92.080
Definition of Bucketsnare	Yes	92.990
Seasons and Bag Limits		
Areas Open to Trapping	Limited	84.270
Bag Limit	No recommendation	84.270
Season Dates	April 15 – October 15	84.270
Emergency Order Closure for Brown Bears	Yes	84.270
Non-residents	No	84.270
Other Regulations		
Controlled Use Areas	No recommendation	92.540
Customary and Traditional uses	Consider	99.025

Proposal 141

Regulation changes evaluated relative to black bear trapping. (Listed in numerical order)

Seasons and Bag Limits

5 AAC 84.270.

Furbearer trapping. Trapping seasons and bag limits for furbearers are as follows:

Units and Bag Limits	Open Season	Bag limit
<u>(XX) Black Bear</u>		
<u>RESIDENTS ONLY</u>		
<u>Unit 12, that portion north of the Alaska Highway, and that portion south of the Alaska Highway within the Tanana River drainage upstream from but not including the Tok River drainage</u>	<u>Apr. 15–June 30 July 1–Oct. 15</u>	<u>No bag limit, by registration permit only; may be closed by emergency order when XX brown bears incidentally taken.</u>
<u>RESIDENTS ONLY</u>		
<u>Unit 16(B)</u>	<u>Apr. 15–June 30 July 1–Oct. 15</u>	<u>No bag limit, by registration permit only; may be closed by emergency order when XX brown bears incidentally taken.</u>
<u>RESIDENTS ONLY</u>		

Unit 19(A)

Apr. 15–June 30
July 1–Oct. 15

No bag limit, by registration only; may be closed by emergency order when XX brown bears incidentally taken.

RESIDENTS ONLY

Unit 19(D)

Apr. 15–June 30
July 1–Oct. 15

No bag limit, by registration only; may be closed by emergency order when XX brown bears incidentally taken.

RESIDENTS ONLY

Unit 20(C)

Apr. 15–June 30
July 1–Oct. 15

No bag limit, by registration permit only; may be closed by emergency order when XX brown bears incidentally taken.

RESIDENTS ONLY

Unit 20(E)

Apr. 15–June 30
July 1–Oct. 15

No bag limit, by registration only; may be closed by emergency order when XX brown bears incidentally taken.

Statewide Regulations

5 AAC 92.0XX

Black bear trapping requirements. Establish a new regulation for black bear trapping requirements.

(a) A person may not trap a black bear with the methods in 5 AAC 92.095, without first obtaining a trapping license and registering with the department.

(b) In addition to any condition that the department may require under 5 AAC 92.051 black bear trapping is subject to the following provisions:

(1) a person must be at least 16 years of age to trap black bears;

(2) a person using bait or scent lures shall clearly identify each site with a sign reading "black bear bait and bucket footsnare station" that also displays the person's trapping license number, or mark each bucket footsnare with the trapping license number;

(3) only biodegradable materials may be used as bait; if fish or game is used as bait, only the head, bones, viscera, or skin of legally harvested fish and game may be used;

(4) a person who uses bait or scent lures must remove bait, litter, and equipment from the site when baiting is completed;

(5) except in Units 12, 13, 15, 16, 19, 20, 21, a person may not give or receive remuneration for the use of a black bear bait and bucket footsnare station, including barter or exchange of goods; however, this paragraph does not apply to a licensed guide-outfitter who personally accompanies a client at the black bear bait and bucket footsnare station site;

(6) a person must report to the nearest department office, within five days, the incidental take of any brown bears taken by bucket footsnare or take of any brown/grizzly bear accompanying a brown bear taken by bucket footsnare;

(7) a person who sets bucket footsnare must check their bucket footsnare a minimum of every two days;

5 AAC 92.051.

Discretionary trapping permit conditions and procedures.

In areas designated by the board, the department may apply any or all of the following conditions to a registration trapping permit:

- (1) a permittee shall demonstrate
 - (A) the ability to identify the permit area;
 - (B) a knowledge of trap use and safety;
- (2) a permittee shall attend an orientation course;
- (3) only a specified number of permittees may trap during the same time period;
- (4) a permittee may trap only in a specified subdivision within the permitted area;
- (5) a permittee may only use traps or snares of a specified type or size;
- (6) a permittee may only set a trap or snare and bait as specified by the department;
- (7) before receiving a permit, the permittee shall acknowledge in writing that he or she has read, understands, and will abide by, the conditions specified for the permit area;
- (8) a permittee may trap only during the specified time periods;
- (9) a permittee must check his or her traps within a specified interval;
- (10) a permit applicant must be at least **16** [10] years old;
- (11) a permit applicant less than **16** [14] years old must be accompanied by an adult, **16 years of age or older**, with a valid trapping license;
- (12) a permittee shall submit, on a form supplied by the department, information requested by the department about the permittee's trapping activities under the permit; the permittee shall submit this form to the department within the time limit set by the department;
- (13) a permittee shall label the permittee's traps and snares as specified by the department.

(14) a permittee who takes an animal under a permit shall deliver specified biological specimens to a check station or to the nearest department office within a time set by the department;

(15) a permittee may not possess or transport an animal unless sufficient portions of the external sex organs remain attached to either the hide or meat to indicate conclusively the sex of the animal, this does not apply to the meat of an animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

(16) a person may not use bait, scent lures, or set a bucket foot snare within

(A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;

(B) one mile of a house or other permanent dwelling, businesses or schools; or

(C) one mile of a developed campground or developed recreational facility;

5 AAC 92.080.

Unlawful methods of taking game; exceptions.

The following methods of taking game are prohibited:

(7) with the aid of a pit, fire, artificial light, laser sight, electronically enhanced night vision scope, radio communication, cellular or satellite telephone, artificial salt lick, explosive, expanding gas arrow, bomb, smoke, chemical (excluding scent lures), or a conventional steel trap with an inside jaw spread over nine inches, except that

(A) a rangefinder may be used;

(B) a killer style trap with a jaw spread of less than 13 inches may be used;

(C) artificial light may be used

(i) for the purpose of taking furbearers under a trapping license during an open season from November 1 – March 31 in Units 7 and 9 – 26; **or black bears under a trapping license during an open trapping season;**

5 AAC 92.095.

Unlawful methods of taking furbearers; exceptions.

(a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:

...

(8) a person who has been airborne may not use a firearm to take or assist in taking a wolf or wolverine until after 3:00 am on the day following the day in which the flying occurred; or in taking a coyote, arctic fox, red fox, [OR] lynx, **or black bear**, unless that person is over 300 feet from the airplane at the time of taking; this paragraph does not apply to a trapper using a firearm to dispatch an animal caught in a trap or snare;

...

(20) taking black bears by any means other than centerfire firearm or a bucket foot snare

5 AAC 92.165.

Sealing of bear skins and skulls.

(a) Sealing is required for brown bear taken in any unit in the state and black bear of any color variation taken in Units 1 - 7, 14(A), 14(C), 15 - 17 and 20(B), and a bear skin or skull before the skin or hide is sold

5 AAC 92.200

Purchase and sale of game.

(a) In accordance with AS 16.05.920 (a) and 16.05.930(e), the purchase, or sale of game or any part of game is permitted except as provided in this section.

(b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale or barter:

...

(8) the meat of big game, **black bear**, and small game,

5 AAC 92.220.

Salvage of game meat, furs, and hides.

(a) Subject to additional requirements in 5 AAC 84 - 5 AAC 85, a person taking game shall salvage the following parts for human use:

(3) **except as provided in (6) of this section,** from January 1 through May 31, the hide, skull, and edible meat as defined in 5 AAC 92.990, and from June 1 through December 31, the hide and skull of a black bear taken in a game management unit in which sealing is required; from June 1 - December 31, the skull and either the hide or edible meat of a black bear taken in Unit 20(B),

(4) **except as provided in (6) of this section,** from January 1 through May 31, the edible meat, and from June 1 through December 31, either the hide, or the edible meat as defined in 5 AAC 92.990, of a black bear taken in any game management unit in which sealing is not required; however, from June 1 through December 31, the edible meat of a black bear taken 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 19(A), that portion of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage and the Black River drainage, and in Units 21(B), 21(C), 21(D), 24, and 25(D) must be salvaged.

...

(6) either the hide, or the edible meat as defined in 5 AAC 92.990, of a black bear taken under a trapping license;

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 bear may be taken by **a black bear trapper during an open trapping season, or** by a resident hunter from October 15 through April 30 under customary and traditional use activities at a den site in Unit 19(A), that portion of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage and the Black River drainage, and in Units 21(B), 21(C), 21(D), 24, and 25(D).

5 AAC 92.990

Definitions:

() “bucket footsnare” means a cable at least 3/16-inch in diameter with a 7x7 strand, equipped with a locking device and at least one swivel, set in a manner designed to catch a bear by the foot; footsnare may only be set when accompanied by a spring powered device that propels the footsnare closed and may only be used inside a bucket or container into which the bear must reach, triggering the spring device and becoming snared by the foot; all footsnare, spring devices, buckets and/or containers must be elevated at least 48 inches off the ground; footsnare must be anchored to a live tree 6 inches in diameter or larger.

5 AAC 99.025

Customary and traditional uses of game populations.

The Board of Game has examined whether the game populations in the units set out in the following table, excluding those units or portions of those units within nonsubsistence areas established by the Joint Board of Fisheries and Game (5 AAC 99.015), are customarily and traditionally taken or used for subsistence and make the following findings:

SPECIES & UNIT	FINDING	AMOUNT REASONABLY NECESSARY FOR SUBSISTENCE USES
(2) Black Bear		
...		
Unit 12	positive	40 - 60
...		
Unit 16(B)	positive	15 - 40

...

Unit 19	positive	30 - 50
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Unit 20, outside the Fairbanks non-subsistence area	positive	20 - 30
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...

Unit 25	positive	150 – 250
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(13) **Furbearers and Fur animals.** The Board of Game (board) finds that all resident uses of furbearers and fur animals are customary and traditional uses, and that furbearers and fur animals, in general, tend to be the focus of these uses, rather than users focusing on individual species or populations. Given this finding, the board also finds that effort on any given population varies according to its harvestable surplus.

(A) Beaver all units with a harvestable portion	positive	harvestable portion
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...

(I) Black Bear
all units with a
harvestable portion

...

(b) In order to establish an amount reasonably necessary for subsistence uses under this section and whether a reasonable opportunity for subsistence uses exists, the Board of Game will, as the board determines is appropriate, attempt to integrate opportunities offered under both state and federal regulations.

(c) In this section,

(1) “amount reasonably necessary for subsistence uses” includes the total amount of animals from a population that must be available for subsistence hunting in order to provide a reasonable opportunity for subsistence uses, under state and federal subsistence hunting regulations, where both exist;

(2) “reasonable opportunity” has the meaning given in AS 16.05.258(f).

Black Bear Trapping Regulations

Proposal 141

No Recommendation



History

- Black bears were classified as a furbearer at January 2010 meeting
- Department evaluated regulation changes needed to implement black bear trapping
- Presentations on concepts of black bear trapping regulation at each regional BOG meeting since then – Public comments

Conservation Issues

- ◎ ADF&G does not anticipate trapping bears would result in any conservation concerns for either black bears or brown/grizzly bears.
 - Trapper participation is unknown
 - Number of bears taken may be relatively small
 - Harvest cap on brown/grizzly bears
 - Reporting/sealing requirements for brown/grizzly bears

3

Administrative Challenges

- ◎ Trapper safety
 - Training and education
 - Age limits
- ◎ Incidental catch of brown bears
 - Minimizing non-target catch and how to deal with it
 - Un-caught bears (sows with cubs)
- ◎ Non-residents
 - Conflicts with guiding requirements (brown bears)
 - Tag fees

4

Current Uses of Snaring

- ◉ Allowed for trapping of other furbearer species

- ◉ Predator Control – Unit 16B

- ◉ Department Research

5

Organization of Presentation

- ◉ Organization of regulation topics:
 - The trapper
 - The bears
 - The trapping site
 - Seasons and bags
 - Other

6

Presentation Materials

- PowerPoint Presentation
- Regulations Summary
- Regulations Detail

Summary of regulatory changes the Board may wish to consider if trapping for black bears is allowed as a furbearer.

Topic	Recommendation	Regulation
The Trapper		
Register with the Department	Yes	92.06x
Minimum Age	20	92.06x & 92.051
Methods of Take	Backpacking/Conspicue	92.095
Trap Check	2 days	92.06x
Same-day Airborne	300 ft	92.095
Commercial Uses	None	92.06x
The Bears		
Salvage	Hide or meat	92.230
Sale of Hide	No	92.500
Biological Specimens	Yes	92.095
Setting Holes for Sale	Yes	92.505
Accidentally Caught Brown Bears	Yes	92.06x
Trapping Cuts	Yes	92.160
Un-captured Bears near Traps	Yes	7
Trapping Sites		
Site Administration	Same as hunting	92.06x
Prohibited Trapping Locations	Same as hunting	92.095
Artificial Light	Yes	92.090
Destruction of Backstays	Yes	92.599
Seasons and Bag Limits		
Areas Open to Trapping	Limited	94.170
Bag Limit	No recommendation	94.170
Season Dates	April 15 - October 15	94.170
Emergency Order Closure for Brown Bears	Yes	94.170
Bears	No	94.170
Non-Residents	No	94.170
Other Regulations		
Controlled Use Areas	See recommendations	92.540
Customary and Traditional uses	Consider	92.021

7

The Trapper

- Register with the Department
- Minimum age
- Methods of take
- Trap check
- Same-day airborne
- Commercial uses

8

The Bears

- ◉ Salvage
- ◉ Sale of meat
- ◉ Biological specimens
- ◉ Sealing hides for sale
- ◉ Incidentally caught brown bears
- ◉ Trapping cubs
- ◉ Un-captured bears near traps

9

Trapping Sites

- ◉ Site maintenance
- ◉ Prohibited trapping locations
- ◉ Artificial light
- ◉ Definition of bucket snare

10

Seasons and Bags

- ◉ Bag limit
- ◉ Areas open (GMUs)
- ◉ Season dates
- ◉ Emergency Order closures for incidental catch of brown bears
- ◉ Non-residents

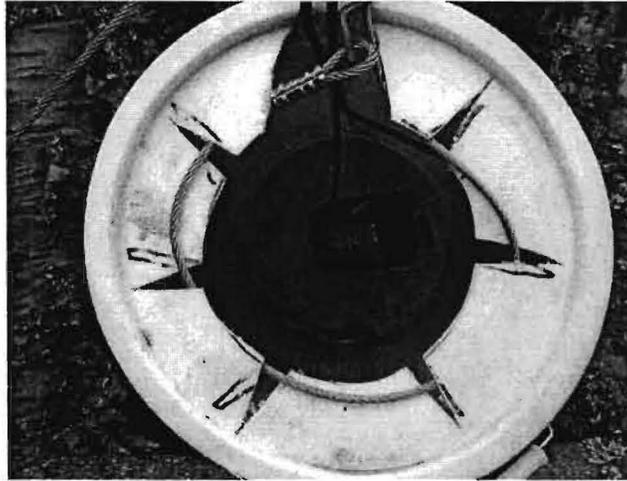
11

Other Regulations

- ◉ Controlled Use Areas
- ◉ Customary and Traditional uses

12

The Bucket Footsnare



13

The Trapper

- ◎ Register with the Department
- ◎ Minimum age
- ◎ Methods of take
- ◎ Trap check
- ◎ Same-day airborne
- ◎ Commercial uses

14

Register with Department

- ◉ Default (if nothing changes in regulation)
 - Purchase of trapping license would be only requirement
- ◉ Recommend
 - Register intent to trap bears with Department

15

Register with Department

5 AAC 92.0XX Black bear trapping requirements.

(a) A person may not trap a black bear with the methods in 5 AAC 92.095, without first obtaining a trapping license and registering with the department.

16

Minimum Age

⦿ Default

- No minimum age

⦿ Recommend

- Age limit--16 years and older

5 AAC 92.0XX Black bear trapping requirements.

(b) In addition to any condition that the department may require under 5 AAC 92.051 black bear trapping is subject to the following provisions:

- (1) a person must be at least 16 years of age to trap black bears;

17

Minimum Age

5 AAC 92.051. Discretionary trapping permit

conditions and procedures. In areas designated by the board, the department may apply any or all of the following conditions to a registration trapping permit:

(10) a permit applicant must be at least **16** [10] years old;

(11) a permit applicant less than **16** [14] years old must be accompanied by an adult, **16 years of age or older**, with a valid trapping license;

18

Methods of Take

⊙ Default

- All snares, leg-hold traps
- Firearms (rimfire and centerfire)
- Archery

⊙ Recommend

- Bucket foot snares
- Centerfire firearms

⊙ Considered

- Archery and Muzzleloader – this would entail developing minimum equipment standards similar to those used in big game hunts

19

Methods of Take

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

(a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:

...

(20) taking black bears by any means other than centerfire firearm or a bucket foot snare

20

Trap Check

- ⦿ Default
 - No requirement
- ⦿ Recommend
 - At least every 2 days

Note: The Board has not supported trap check requirements for other furbearers – winter seasons

21

Trap Check

5 AAC 92.0XX Black bear trapping requirements.

(b) In addition to any condition that the department may require under 5 AAC 92.051 black bear trapping is subject to the following provisions:

(7) a person who sets bucket footsnare must check their bucket footsnare a minimum of every two days;

22

Same-day Airborne

◎ Default

- Same-day airborne permitted for trapping

◎ Recommend

- Allow same-day airborne, greater than 300 feet of aircraft

23

Same-day Airborne

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

- (a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:

...

- (8) a person who has been airborne may not use a firearm to take or assist in taking a wolf or wolverine until after 3:00 am on the day following the day in which the flying occurred; or in taking a coyote, arctic fox, red fox, [OR] lynx, **or black bear**, unless that person is over 300 feet from the airplane at the time of taking; this paragraph does not apply to a trapper using a firearm to dispatch an animal caught in a trap or snare;

24

Commercial Uses of Trapping

⦿ Default

- Unlimited - Trappers can receive payment for taking people on traplines

⦿ Recommend

- Limit commercial uses

25

Commercial Use of Trapping

5 AAC 92.0XX Black bear trapping requirements.

(b) In addition to any condition that the department may require under 5 AAC 92.051 black bear trapping is subject to the following provisions:

(5) except in Units XX a person may not give or receive remuneration for the use of a black bear bait and bucket footsnare station, including barter or exchange of goods; however, this paragraph does not apply to a licensed guide-outfitter who personally accompanies a client at the black bear bait and bucket footsnare station site;

26

The Bears

- ⊙ Salvage
- ⊙ Sale of meat
- ⊙ Biological specimens
- ⊙ Sealing hides for sale
- ⊙ Incidentally caught brown bears
- ⊙ Trapping cubs
- ⊙ Un-captured bears near traps

27

Salvage

- ⊙ Default
 - Hides only
 - Meat can be sold
- ⊙ Recommend
 - Either meat or hide
 - Meat cannot be sold

28

Salvage

5 AAC 92.220. Salvage of game meat, furs, and hides.

(a) Subject to additional requirements in 5 AAC 84 - 5 AAC 85, a person taking game shall salvage the following parts for human use:

(3) except as provided in (6) of this section, from January 1 through May 31, the hide, skull, and edible meat as defined in 5 AAC 92.990, and from June 1 through December 31, the hide and skull of a black bear taken in a game management unit in which sealing is required; from June 1 - December 31, the skull and either the hide or edible meat of a black bear taken in Unit 20(B),

(4) except as provided in (6) of this section, from January 1 through May 31, the edible meat, and from June 1 through December 31, either the hide, or the edible meat as defined in 5 AAC 92.990, of a black bear taken in any game management unit in which sealing is not required; however, from June 1 through December 31, the edible meat of a black bear taken 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 19(A), that portion of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage and the Black River drainage, and in Units 21(B), 21(C), 21(D), 24, and 25(D) must be salvaged.

...

(6) either the hide, or the edible meat as defined in 5 AAC 92.990, of a black bear taken under a trapping license;

29

Sale of Black Bear Meat

5 AAC 92.200 Purchase and sale of game.

(a) In accordance with AS 16.05.920 (a) and 16.05.930(e), the purchase, or sale of game or any part of game is permitted except as provided in this section.

(b) Except as provided in 5 AAC 92.031, a person may not purchase, sell, advertise, or otherwise offer for sale or barter:

...

(8) the meat of big game, **black bear**, and small game,

30

Biological Specimens and Identification of Sex

⊙ Default

- None required

⊙ Recommend

- Similar requirement for bears taken under hunting

31

Biological Specimens and Identification of Sex

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

(a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:

...

(14) a permittee who takes an animal under a permit shall deliver specified biological specimens to a check station or to the nearest department office within a time set by the department;

(15) a permittee may not possess or transport an animal unless sufficient portions of the external sex organs remain attached to either the hide or meat to indicate conclusively the sex of the animal, this does not apply to the meat of an animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

32

Sealing Bear Hides

⊙ Default

- Sealing of bears intended for sale is currently required

⊙ Recommend

- Remain the same

Note: included primarily for review.

33

Sealing Bear Hides

5 AAC 92.165. Sealing of bear skins and skulls.

(a) Sealing is required for brown bear taken in any unit in the state and black bear of any color variation taken in Units 1 - 7, 14(A), 14(C), 15 - 17 and 20(B), and a bear skin or skull before the skin or hide is sold

34

Incidentally Caught Brown Bears

⊙ Default

- Remain property of the state
- No reporting requirement

⊙ Recommend

- Remain property of the state
- Must be reported to the Department within 5 days

35

Incidentally Caught Brown Bears

5 AAC 92.0XX Black bear trapping requirements.

(b) In addition to any condition that the department may require under 5 AAC 92.051 black bear trapping is subject to the following provisions:

....

(6) a person must report to the nearest department office, within five days, the incidental take of any brown bears taken by bucket footsnare or take of any brown/grizzly bear accompanying a brown bear taken by bucket footsnare;

36

Trapping cubs

⊙ Default

- Not allowed

⊙ Recommend

- Allow the taking of cubs with trapping

37

Trapping cubs

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 bear may be taken by **a black bear trapper during an open trapping season, or** by a resident hunter from October 15 through April 30 under customary and traditional use activities at a den site in Unit 19(A), that portion of the Kuskokwim River drainage within Unit 19(D) upstream from the Selatna River drainage and the Black River drainage, and in Units 21(B), 21(C), 21(D), 24, and 25(D).

38

Un-captured Brown Bears Near Traps

- ◉ Default
 - Not allowed to be legally taken, except DLP
- ◉ Recommend
 - Allow protective or dependent bears to be harvested

 - Note: Could be handled as DLP or by creating another regulation

39

Trapping Sites

- ◉ Site maintenance
- ◉ Prohibited trapping locations
- ◉ Artificial light
- ◉ Definition of bucket snare

40

Black Bear Trap Site Maintenance

- ⦿ Must register with the department
- ⦿ Must be clearly marked
- ⦿ Must be cleaned up after use
- ⦿ Only biodegradable materials can be used for bait

41

Trap site maintenance

- ⦿ Default
 - No standards
- ⦿ Recommend
 - Use same standards that exist for baiting bears under hunting regulations

42

Trap site maintenance

⦿ 5 AAC 92.0XX Black bear trapping requirements.

(b) In addition to any condition that the department may require under 5 AAC 92.051 black bear trapping is subject to the following provisions:

(2) a person using bait or scent lures shall clearly identify each site with a sign reading "black bear bait and bucket footsnare station" that also displays the person's trapping license number, or mark each bucket footsnare with the trapping license number;

(3) only biodegradable materials may be used as bait; if fish or game is used as bait, only the head, bones, viscera, or skin of legally harvested fish and game may be used;

(4) a person who uses bait or scent lures must remove bait, litter, and equipment from the site when baiting is completed;

43

Prohibited Trapping Locations

⦿ Default

⦿ No limitations on where trapping could occur

⦿ Recommend

⦿ Use the same limitations as baiting under hunting regulations

44

Trapping locations prohibited

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

(a) The following methods and means of taking furbearers under a trapping license are prohibited, in addition to the prohibitions in 5 AAC 92.080:

...

(16) a person may not use bait, scent lures, or set a bucket foot snare within

(A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;

(B) one mile of a house or other permanent dwelling, businesses or schools; or

(C) one mile of a developed campground or developed recreational facility;

45

Artificial light

⦿ Default

- Would not be allowed

⦿ Recommended

- Permit use of lights for personal safety

46

Artificial light

5 AAC 92.080. Unlawful methods of taking game; exceptions. The following methods of taking game are prohibited:

- (7) with the aid of a pit, fire, artificial light, laser sight, electronically enhanced night vision scope, radio communication, cellular or satellite telephone, artificial salt lick, explosive, expanding gas arrow, bomb, smoke, chemical (excluding scent lures), or a conventional steel trap with an inside jaw spread over nine inches, except that

....

(C) artificial light may be used

- (i) for the purpose of taking furbearers under a trapping license during an open season from November 1 – March 31 in Units 7 and 9 – 26; **or black bears under a trapping license during an open trapping season;**

47

Definition of Bucket Footsnare

92.990 Definitions:

- (i) "bucket footsnare" means a cable at least 3/16-inch in diameter with a 7x7 strand, equipped with a locking device and at least one swivel, set in a manner designed to catch a bear by the foot; footsnare may only be set when accompanied by a spring powered device that propels the footsnare closed and may only be used inside a bucket or container into which the bear must reach, triggering the spring device and becoming snared by the foot; all footsnare, spring devices, buckets and/or containers must be elevated at least 48 inches off the ground; footsnare must be anchored to a live tree 6 inches in diameter or larger.**

48

Seasons and Bags

- ⊙ Bag limit
- ⊙ Areas open (GMUs)
- ⊙ Season dates
- ⊙ Emergency Order closures for incidental catch of brown bears
- ⊙ Non-residents

49

Seasons and Bags

5 AAC 84.270. Furbearer trapping. Trapping seasons and bag limits for furbearers are as follows:

Units and Bag Limits	Open Season	Bag limit
<u>(XX) Black Bear</u>		
<u>RESIDENTS ONLY</u>		
<u>Unit XX</u>	<u>Apr. 15–June 30</u> <u>July 1–Oct. 15</u>	<u>No bag limit, by registration permit only; may be closed by emergency when XX brown bears incidentally taken.</u>

50

Units Under Consideration

- ⦿ Unit 12, that portion north of the Alaska Highway and west of the Taylor Highway

- ⦿ Unit 19A

- ⦿ Unit 20C

- ⦿ Unit 20E

51

Other Regulations

- ⦿ Controlled Use Areas
- ⦿ Customary and Traditional uses

52

Controlled Use Areas

- ◉ Technically, the following areas will be open for the use of mechanized vehicles for bear trapping (current regulations only apply to hunting).
 - Glacier Mountain CUA
 - Ladue River CUA
 - Upper Kuskokwim CUA
 - Holitna - Hoholitna CUA

53

Questions

54

AC 71

February 29, 2012

From: Daniel J. Coverdell, MD
15217 Darby Road
Eagle River, AK 99577
Phone (907) 230-8549

To: Kristy Tibbles, Executive Director
Board of Game
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Phone (907) 465-4110

Re: Proposition 102A – Aid or use of pack stock in the family Bovidae or Camelidae while hunting big game prohibited/restricted.

Dear Ms. Kristy Tibbles:

I am petitioning the Alaska Board of Game in accordance with AS 44.62.220 (Right to Petition) to reconsider Proposal 102A because this regulatory action violated the public process for the following reasons:

- 1) Proposal 102 (102) in its original form would have affected only sheep and goat hunters. However, the proposal was then amended (Proposal 102A) to affect all big game hunters without giving the public a chance to review and comment. I pack with llamas and use them for hunting big game such as moose. I do not use them to hunt sheep and/or goats. The Board made a substantive change to 102, and should have allowed the public to comment on revised Proposal 102A. However, **I was not allowed the opportunity to review and comment on the amended version (Proposal 102A) as it would apply to my hunting interests.** This is required by Alaska Statute 44.62.200(b) (Contents of notice) which states: *A regulation that is adopted, amended, or repealed may vary in content from the summary specified in (a)(3) of this section if the subject matter of the regulation remains the same and the original notice was written so as to assure that members of the public are reasonably notified of the proposed subject of agency action in order for them to determine whether their interests could be affected by agency action on that subject.* This amended proposal (102A) now prohibits me from using my llamas to hunt moose, and 102 as originally proposed did not do this. Therefore, I am petitioning the Board to

AC
2/29/2012

open Proposal 102A for public comment, or delete 102A from the new regulations entirely.

- 2) Furthermore, Proposal 102 was amended to allow llama owners to hunt big game if determined by ADF&G to be certified free of Johnes Disease, lungworm, and Pasteurellae bacteria. This regulation will require me to conduct tests on my llamas periodically at my expense to satisfy these requirements. The process to obtain testing and certification, and the costs to do so have not yet been determined. Therefore, the Board was not able to consider costs in complying with 102A.

The costs incurred by private persons resulting from this proposed regulation should have been considered as required by Alaska Statute 44.62.210 Public proceedings (a) *On the date and at the time and place designated in the notice the agency shall give each interested person or the person's authorized representative, or both, the opportunity to present statements, arguments, or contentions in writing, with or without opportunity to present them orally. The state agency may accept material presented by any form of communication authorized by this chapter and shall consider all factual, substantive, and other relevant matter presented to it before adopting, amending, or repealing a regulation. When considering the factual, substantive, and other relevant matter, the agency shall pay special attention to the cost to private persons of the proposed regulatory action.*

I appreciate your attention to this matter. I can be contacted at (907) 230-8549 if you have questions, or need additional information.

Sincerely,



Daniel J. Coverdell MD

Tibbles, Kristy R (DFG)

From: Jason Johnston [jayjohnston@hotmail.com]
Sent: Thursday, March 01, 2012 7:16 PM
To: Tibbles, Kristy R (DFG)
Subject: FW: Pack Animal Ban \$1

A forward from a supporter and defender of animal packing in Alaska . . .

From: Dustin Renner [mailto:dustin@dustinrenner.com]
Sent: Thursday, March 01, 2012 6:44 PM
To: 'Dustin Renner'
Subject: FW: Pack Animal Ban \$1

Hello,

With what I have been hearing for the last couple of years, I did see the possibility of Fish and Game taking some sort of actions with Pack Goats in Sheep habitat. I did not foresee them shutting them down completely. I assumed that someday they would require health certificates, tying them at night, possibly keeping them on strings, etc. but did not see them fully eliminating their use! What a surprise, here it is in front of us now. I would have hoped for more time to prepare but when something is staring you in the face, you have to deal with it. I guess that is if you truly care about the issue. I think one of the problems we are up against is that there are not many of us out here and we are probably looked at as an easy target (little resistance).

I have used pack goats for years and have packed many types of animals out of the back country with them. I have to really question why they felt it necessary to shut them down completely. I successfully packed many moose with them and not one of the moose I packed was even remotely close to sheep habitat. I have read articles where certain groups are concerned about pack goats in sheep and goat habitat, but never have I heard where they are a concern for moose, bear, caribou, etc. If that is the case, maybe what they are going to do next is outlaw them completely in Alaska. Considering there are a lot of people keep them on their properties, and many live in areas where there are a lot of moose moving through their land, you would think this would put the moose in danger... How many cases or instances have any of you ever heard of moose getting sick from coming in contact with domestic animals? I personally have never heard of one here in Alaska.

I called and talked with Cliff Judkins, the chairman of the Fish and Game board. I know Cliff from previous encounters and he is a nice and reasonable man. He really seemed to listen to what I had to say on the phone. He told me that they basically had to do what the Alaska State Vet recommended. I have read her (the state vets) articles and feel very strongly that she is making decisions and influencing others based on very limited information, here say and others opinions which are not based on any real facts. My friend Kevin Wellington, who is also a vet here in Alaska and I have talked about this before in the past. He supports the idea and use of pack goats. I am copying him on this email as well so that he is aware of what is happening.

Pack Goats have been under attack in the states for some time. I belong to a Yahoo Pack Goat Group who has been involved in trying to reason with the different forms of government involved. This group has had pretty good results recently and they may have some insight and ideas for us. I will let them know what has happened here.

There is also a national association, I believe they are called The North American Pack Goat Association. Jason was going to contact them today as well.

From what I have been able to gather, neither sides of this issue have "all of the facts." I would never want to be responsible for harming a wildlife population and am thus very open minded to their concerns, issues and any facts that

they can provide regarding this issue. So far, I have not seen anything that I feel gives them justification to shut our use of goats down.

There are many people who have a considerable amount of money and time invested in their goats. I was not made aware of this issue being voted on until from what I can see, it is either too late, or just about too late. How many pack goat owners knew about this being voted on or had a chance to speak up at the public comment period on this issue?

I am hopeful that enough people will voice their opinions to the board and become involved. I have hope that this situation can be reversed and our rights can be better respected.

The reason I got into goats to begin with was that I hurt my low back bad enough that I couldn't carry large back packs any longer. I have spent thousands of hours in the woods with my goats and never one time did they come into contact with any wild animal. I constantly kept control of them and they were never left in a situation where contact could have occurred. Even if they would have, my goats were not sick. My goats were tested and always given the best of care. It is unfair for these people to take something away from us that we value as much as we do, especially without us speaking up and getting a chance to be heard.

I no longer have pack goats, as you are aware, but hopefully will have them again in the future. Some of the greatest memories in my outdoor life are from the days with my goats.

Please feel free to forward my email on to anyone who you think will be concerned about this.

Thanks,
Dustin Renner

791 Redpoll Ln
Fairbanks, AK 99712
March 3, 2012

Alaska Board of Game

Re: Game Proposal No. 174 (March 2012 BOG Meeting)

Dear Board Members:

During the period of 1988 to 2002 I conducted several aerial moose surveys in the far northeast part of the State (GMU 25A, 26B and 26C). Starting in 1995 and extending to 2001 I also conducted a radio-telemetry study of moose migrations in the upper Sheenjek, Coleen, Firth and Kongakut drainages (Mauer 1998). A total of 57 adult moose were captured and collared with conventional VHF radio-transmitter collars, in late March of 1995. Fifteen moose each were marked in the Sheenjek, Coleen and Firth areas, and 12 in the Kongakut drainage. Relocation surveys were flown weekly during spring, summer and fall, and every 1 to 2 month intervals during winter. About 75% of the marked moose migrated across the international border and spent the summer in Old Crow Flats (OCF) in Canada. Nearly all moose marked in the Kongakut and Firth areas migrated to OCF where the calves of this subpopulation were born. Results of this study documented the longest migration (average 123 miles) from winter to summer range for moose in North America.

All hunting of moose in the Kongakut and Firth drainages was closed by BOG action in the mid 1990's, following a collapse of moose populations across the north slope. Sometime between 1991 and 2000, the moose population using the upper Sheenjek, Coleen, Kongakut and Firth areas declined by about 50%. It is my understanding that since the closure of north slope moose harvest in the mid-90's, this population has shown some increase. It is important to keep in mind that moose harvest has not been restricted in the Sheenjek and Coleen areas (GMU 25A). It is also important to consider that the radio telemetry study showed that most of the moose that migrate to the Kongakut drainage do so by way of the Coleen, and that moose destined for the Sheenjek, Coleen and Kongakut pass through the Firth area. The study also revealed that some moose that rut and winter on the upper Sheenjek also travel through the upper Kongakut prior to their arrival in the Sheenjek.

I was able to visit these winter ranges during the summers of 2004, 2006, 2010 and 2011. Evidence such as browsed willows, winter pellets, and shed antlers suggest that moose densities remain lower in the Sheenjek and Coleen areas. It is my understanding that concern has been expressed in recent years about lower abundance of moose in the Sheenjek and Coleen areas.

Implications of Proposal 174

Moose inhabiting the region of the upper Sheenjek, Coleen (GMU 25A), Kongakut and Firth drainages of northeast Alaska are highly migratory and because of the open tundra and low shrub vegetation communities of the region, moose are highly vulnerable to harvest pressure. While Proposal 174 would open the Kongakut and Firth areas to hunting, the subsequent harvest would likely include some moose that ultimately migrate to the Sheenjek and Coleen where populations are already significantly lower.

Recommendation

I recommend that Proposal 174 not be adopted by the BOG at this time because of the negative consequences it will have for already impaired moose populations in the upper Sheenjek and Coleen areas. Instead, the BOG should consider a drawing hunt for the Sheenjek and Coleen areas now, while continuing the closure of the upper Kongakut and Firth areas which are critical for restoring moose numbers in the Sheenjek/Coleen areas. Any harvest regulation changes should only be made after careful consider the full diversity of the migration patterns and high vulnerability of moose in this region.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Fran Mauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Fran Mauer
(Wildlife Biologist retired)

Reference: Mauer, F.J. 1998. Moose migrations: northeastern Alaska to northwestern Yukon Territory, Canada. Alces 34:75-81.

Fairbanks Advisory Committee - Moose Worksheet

Data from ADF&G Moose Management Reports & Game Biologists - Updated: 10/24/11

GMU 20A - Tanana Flats, Central Alaska Range (6796 sq mi)

Moose - Intensive Management Population & Harvest Objective: 10,000 to 12,000 (Years = start of Regulatory Year, e.g. 2002 = 2002 / 2003)

Population Estimate Survey	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	Draft 2011	Draft 2012
Total Survey Units = 987, # Surveyed	86	114	78	No Surv	112	129	123	115	No Surv	158	116	114		
SU surveyed High:Low Density	54:34	69:45	50:28		65:47	81:48	76:47	71:44		99:55	80:36	78:36		
Estimated Population SCF=1.21	13558	12774	13928		17768	16415	16151	15455		12537	15677	14497		
No Sightability Correction Factor (SCF)	11205	10557	11511		14684	13566	13348	12773		10361	12956	11981		
Moose Observed	965	1377	887		1483	1922	1684	1536		1672	1740	1486		
Adults	760	1089	737		1212	1512	1370	1232		1335	1411	1196		
Percent Calves	21%	21%	17%		18%	21%	19%	20%		19%	20%	20%		
Bull/Cow Ratio - Bull:100 Cows	23	23	26		32	35	38	36		37	32	32		
Calf/Cow Ratio - Calf:100 Cows	33	35	26		28	36	30	34		35	30	32		
# Moose/sq mi	2.7	2.5	2.3		3.5	3.3	3.2	3.1		2.5	3.1	2.9		
Twinning Rate Survey % Twins (a)	3%	10%	4%	9%	5%	9%	11%	14%	13%	15%	10%	12%	19%	
Harvest & Accidental Death	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	Draft 2011	Draft 2012
General Season Hunters	1571	1584	1551	1181	1189	1628	1816	1608	1585	1489	1443	1311		
Total Successful	657	541	539	353	331	393	444	408	384	451	394	344		
% Success	42%	34%	35%	30%	28%	24%	24%	25%	24%	30%	27%	26%		
Antlerless Permits Issued		300	300	205	320	5430	5114	3737	3721	1852	1057	1355		
Total Successful		71	76	94	145	595	679	559	469	197	242	269		
% Success (for those that hunted)		42%	48%	64%	66%	25%	25%	27%	25%	31%	32%	37%		
Drawing Permits Issued		300	300	205	320	No Draw	No Draw	No Draw	No Draw	No Draw	372	645	765	1950 ?
Registration Permits Issued		No Reg	No Reg	No Reg	No Reg	5430	5114	3737	3721	1852	685	710	None Yet	
Females Harvested (Reported)		68	70	94	141	553	629	484	421	171	189	225	133	
Males Harvested (Reported)		3	5	0	4	37	47	66	44	24	33	39		
Did Not Hunt		132	140	57	100	3069	2397	1680	1833	1208	293	633		
Any Bull - Permits Issued							75	375	576	825	1000	895	750	
Total Successful							8	85	113	170	194	200	201	
Estimated Human Harvest (b)	805	739	830	647	683	1334	1527	1419	1299	1108	1142	1111		
Reported Hunter Harvest Male Moose	663	541	541	363	347	431	497	558	538	642	634	583		
Reported Hunter Harvest Female Moose	1	74	70	115	159	557	634	493	417	171	201	225		
Accidental Death Road/Train (Reported)	3/11	2/34	3/4	7/6	0/6	0/11	0/6	2/8	0/8	1/11	1/0	0/0		
TOTAL - Est. Human Harvest & Accidental	819	775	837	660	689	1345	1533	1429	1307	1120	1143	1090		

Notes: (a) Twinning surveys - 2002-05 Central Tanana Flats only. Other yrs = Mean of % twins for central, western & eastern Tanana Flats. (b) Estimated Human Harvest Total includes General Hunt & Permit numbers. The reported harvest # x 1.35 for unreported, potlatch, wounding loss, illegal snaring etc. **History:** 2003 Intensive Management Pop Objective, 2002 Spike Fork 50" Antler Restriction started 20A, 2006 Any Bull Permits started. ADFG Harvest Goal: Bulls - appx 550 Bulls/Year.

RC 73

(e) **Unit 19(A) Predation Control Area:** the Unit 19(A) Predation Control Area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(A), encompassing approximately 9,969 square miles; this predator control program does not apply within National Park Service or National Wildlife Refuge lands unless approved by the federal agencies; notwithstanding any other provision in this title, and based on the following information, the commissioner or the commissioner's designee may conduct a wolf **and a black bear and brown bear** population reduction or wolf **and black bear and brown bear** population regulation program in the Unit 19(A) Predation Control Area:

(1) the following Predation Control Focus Areas are established in Unit 19(A):

(A) a Unit 19(A) Wolf Predation Control Focus Area (WCFA) is established and consists of approximately 3,913 square miles generally within the Holitna, Hoholitna, and Stony River drainages; the purpose is to focus wolf control in a relatively small area where moose are accessible to hunters, rather than spread this effort over the entire game management unit; wolf control will be conducted only within the WCFA; the department will have the discretion to adjust its size and shape up to 40 percent (approximately 4,000 square miles) of Unit 19(A);

(B) a Unit 19(A) Black Bear and Brown Bear Predation Control Focus Area (BCFA) is established and consists of those portions of the Kuskokwim River drainage within the area starting at Sleetmute at 61° 42.00' N. lat., 157° 10.00' W. long., then east to 61° 42.00' N. lat., 157° 00.00' W. long., then north to 61° 44.00' N. lat., 157° 00.00' W. long., then east to 61° 44.00' N. lat. 156° 55.00' W. long., then north to 61° 46.00' N. lat., 156° 55.00' W. long., then east to 61° 46.00' N. lat. 156° 50.00' W. long., then north to 61° 48.00' N. lat., 156° 50.00' W. long., then east to 61° 48.00' N. lat., 156° 45.00' W. long., then north to 61° 50.00' N. lat., 156° 45.00' W. long., then east to 61° 50.00' N. lat., 156° 30.00' W. long., then south to 61° 40.00' N. lat., 156° 30.00' W. long., then west to 61° 40.00' N. lat., 156° 45.00' W. long., then south to 61° 18.00' N. lat., 156° 45.00' W. long., then west to 61° 18.00' N. lat., 157° 15.00' W. long., then north to 61° 24.00' N. lat., 157° 15.00' W. long., then east to 61° 24.00' N. lat., 157° 10.00' W. long., then north to 61° 42.00' N. lat., 157° 10.00' W. long., encompassing approximately 540 square miles; the purpose is to focus bear control in an area where moose are accessible to hunters, rather than spread this effort over the entire game management unit; bear control will be conducted only within the BCFA; the department will have the discretion to adjust its size and shape by 40 percent (approximately 325 – 750 square miles); the BCFA is generally within the WCFA;

(2) [(1)] the discussion of wildlife population and human use information is as follows:

(A) prey population information is as follows:

(i) a Central Kuskokwim [VILLAGES] moose management area (MMA) is established within **the same area as the WCFA and includes the BCFA;** [UNIT 19(A) PREDATION CONTROL AREA, ENCOMPASSING APPROXIMATELY 3,913 SQUARE MILES GENERALLY WITHIN THE HOLITNA, HOHOLITNA, AND STONY RIVER DRAINAGES] the purpose of the MMA is to **designate an area where moose numbers are closely monitored and objectives for number of moose and moose harvest can be applied; the department may adjust the size and shape of the MMA;** [FOCUS INTENSIVE MANAGEMENT ACTIVITIES, INCLUDING PREDATOR CONTROL AND HABITAT MANAGEMENT, IN A RELATIVELY SMALL AREA WHERE MOOSE ARE ACCESSIBLE TO HUNTERS, RATHER THAN SPREAD THIS EFFORT OVER THE ENTIRE GAME MANAGEMENT UNIT; WOLF CONTROL WILL BE CONDUCTED ONLY WITHIN THE MMA, AND THE DEPARTMENT WILL HAVE THE DISCRETION TO ADJUST ITS SIZE AND SHAPE UP TO 40 PERCENT (APPROXIMATELY 4,000 SQUARE MILES) OF UNIT 19(A);]

(ii) the moose population size for Unit 19(A) was estimated in March 2004, based upon earlier estimates of density in portions of the unit; in March 1998, 1.25 moose per square mile (plus or minus 14 percent at an 80 percent confidence interval) was estimated in a portion of the Holitna-Hoholitna drainage; in March 2001, 0.7 moose per square mile (plus or minus 21 percent at a 90 percent confidence interval) was estimated in a portion of the Aniak River drainage; extrapolation of data from both estimates to all of Unit 19(A) resulted in an estimated total population size of 4,300 - 6,900 moose; the population size for Unit 19(A) was updated in February 2005, based upon an estimate of 0.27 moose per square mile (plus or minus 16 percent at a 90 percent confidence interval) obtained from a survey in the portion of the unit south of the Kuskokwim River; extrapolation of **these** [THIS] data to all of Unit 19(A) resulted in an estimated total population size of 3,000 - 4,000 moose (0.3 - 0.4 moose per square mile), which was corrected for sightability of moose and was lower than the 2004 estimate indicating moose numbers had declined; the population size estimate was updated in March 2006, based on an estimate of 0.39 moose per square mile (plus or minus 15 percent at a 90 percent confidence interval) obtained from a survey conducted south of the Kuskokwim River, from Kalskag to the mouth of Crooked Creek (3,440 square miles); extrapolation of these data to all of Unit 19(A) resulted in a estimated total population size of 2,700 - 4,250 moose (0.27 - 0.42 moose per square mile), which was also corrected for sightability; the population size was updated again in March 2008, based on an estimate of 0.55 moose per square mile (plus or minus 28 percent at the 90 percent confidence interval) obtained within a 3,874 square mile moose survey area located south of the Kuskokwim River, within the Holitna, Hoholitna, and Stony River drainages; extrapolation of these data to all of Unit 19(A) resulted in an estimated total population size of 3,200 - 5,275 moose (0.32 - 0.53 moose per square mile), which was corrected for sightability; **the population size was updated in March 2011, based on an estimate of 0.43 moose per square mile (plus or minus 36 percent at the 90 percent confidence interval) obtained within a 3,874 square mile moose survey**

area located south of the Kuskokwim River, within the Holitna, Hoholitna, and Stony River drainages; extrapolation of these data to all of Unit 19(A) resulted in an estimated total population size of 2,791 - 5,782 moose (0.28 - 0.58 moose per square mile), which was corrected for sightability;

(iii) in November 2001, a survey on the Holitna-Hoholitna Rivers in Unit 19(A) was conducted; a total of 196 moose were classified with an observed bull-to-cow ratio of 6:100 and an observed calf-to-cow ratio of 8:100; the low numbers observed could have been influenced by an atypical moose distribution caused by shallow snow and relatively temperate late-fall weather;

(iv) in November 2004, a survey was conducted to estimate composition in the Holitna-Hoholitna, Oskawalik, and Stony River portion of Unit 19(A) (4,828 square miles); a total of 226 moose were classified and the bull-to-cow ratio (19:100, plus or minus 76 percent at a 90 percent confidence interval) and calf-to-cow ratio (32:100, plus or minus 38 percent at a 90 percent confidence interval) estimates were higher than observed in the November 2001 trend count survey; some improvement in the ratios is indicated; however, results of the two surveys cannot be directly compared because the 2004 survey covered a much larger geographic area and was done using different methods than the 2001 survey; the estimated percent moose calves in the total population during the November 2004 composition survey was 22 percent (plus or minus 38 percent with a 90 percent confidence interval);

(v) in November 2005, composition surveys were conducted in the Holitna-Hoholitna drainage in Units 19(A) and 19(B) and in the Aniak River drainage including the Kuskokwim River from Lower Kalskag to Napaimiut in Unit 19(A); a different technique was implemented than what was used for previous composition surveys because of the concern about possible atypical moose distribution when confining the survey area to the river corridor and the concern about wide confidence intervals in the November 2004 survey; a total of 307 moose were observed and the observed bull-to-cow ratio was 8:100 with most (12 of 19) bulls classified as yearlings; the observed calf-to-cow ratio was 24:100 and the percent of calves was 18 percent; the low bull-to-cow ratios observed during the past three composition surveys indicate that hunting pressure has been high in the Holitna-Hoholitna drainage; in the western portion of Unit 19(A), the Aniak River drainage and the Kuskokwim River from Lower Kalskag to Napaimiut was also surveyed; composition data had not been collected previously in this portion of Unit 19(A); a total of 410 moose were counted with an observed bull-to-cow ratio of 20:100 and an observed calf-to-cow ratio of 23:100;

(vi) in November 2007, composition surveys were conducted in the Holitna-Hoholitna drainage in Unit 19(A) and in the Aniak River drainage downriver from the Buckstock River including the Kuskokwim River from Lower Kalskag to Aniak in Unit 19(A); in the Holitna-Hoholitna drainage a total of 200 moose were observed, the bull-to-cow ratio was 35:100, the calf-to-cow ratio was 45:100, and the percent of calves was 25 percent; in the Aniak River drainage a total of 122 moose were observed, the bull-to-cow ratio was 28:100, the calf-to-cow ratio was 51:100, and the percent of calves was

29 percent; in November 2008, composition surveys were again conducted in the same area; in the Holitna-Hoholitna drainage a total of 117 moose were observed, the bull-to-cow ratio was 34:100, and the calf-to-cow ratio was 27:100, and the percent of calves was 18 percent; in the Aniak River drainage a total of 51 moose were observed, the observed bull-to-cow ratio was 42:100, and the observed calf-to-cow ratio was 23:100, and the percent of calves was 14 percent;

(vii) in November 2009, composition surveys were conducted in the Holitna-Hoholitna drainage; a total of 129 moose were observed, the bull-to-cow ratio was 51:100, the calf-to-cow ratio was 36:100, and the percent of calves was 19; in November 2010, composition surveys were conducted in the Holitna-Hoholitna drainage a total of 212 moose were observed, the bull-to-cow ratio was 48:100, the calf-to-cow ratio was 19:100, and the percent of calves was 11; in November 2011, composition surveys were conducted in the Holitna-Hoholitna drainage; a total of 164 moose were observed, the bull-to-cow ratio was 38:100, the calf-to-cow ratio was 31:100, and the percent of calves was 18;

(viii) [(VII)] birth rate among radiocollared cows in Unit 19(A) is high; in 2005, of nine radiocollared cows in the lower Holitna River, three had twins, four had a single calf, and two had no calf (78 percent birth rate); of eight radiocollared cows in the Aniak River drainage, two had twins and six had single calves (100 percent birth rate); overall, the 2005 birth rate among radiocollared cows in Unit 19(A) was 88 percent; combined data from twinning surveys in the Holitna during 2007, 2008, and 2010, indicate 12 of 19 cows with calves had twins (63% twinning rate);

(ix) [(VIII)] a late winter survey to estimate calf survival, conducted in April 2003 in Unit 19(A), resulted in an estimate of 7.6 percent calves in the moose population in Holitna-Hoholitna drainage (sample size 107 adults and 9 short-yearlings) and 8.9 percent in the moose population in the Aniak River drainage (sample size 61 adults and six short-yearlings); spring population surveys conducted south of the Kuskokwim River drainage and west of the Holitna-Hoholitna drainage (3,440 square miles) in 2006, resulted in 17 percent calves and 9 percent calves respectively (plus or minus 30 percent at a 90 percent confidence interval); the calf-to-cow ratios in fall and the percent of calves found in spring surveys support the conclusion that calf survival in the moose population is very low, and a decline in moose numbers is probably occurring;

(x) [(IX)] based on current estimates of recruitment, population density and bull-to-cow ratios, there is no harvestable surplus in eastern Unit 19(A) (upstream from and excluding the George River), excluding the Lime Village Management Area; in western Unit 19(A) (downstream from and including the George River), the harvestable surplus is 60 bulls, using a conservative harvest rate for bulls that is based on three percent of the total estimated population;

(xi) [(X)] the intensive management moose population objective established by the board for Units 19(A) and 19(B) is 13,500 - 16,500 moose; based on the relative sizes of the two units, the proportional population objective for Unit 19(A) alone is 7,600 -

9,300 moose; the intensive management moose harvest objective for Units 19(A) and 19(B) is 750 - 950 moose; the proportional harvest objective for Unit 19(A) alone is 400 - 550 moose; achieving the population and harvest objectives for Unit 19(A) will contribute to achieving the intensive management population and harvest objectives established for Units 19(A) and 19(B);

(xii) [(XI)] based on data available, habitat is probably not a factor limiting population growth in moose in the central Kuskokwim region; a browse survey in Unit 19(D) (in the upper Kuskokwim River) during spring 2001, found that moose were removing about 16 percent of current annual growth; these removal rates are near the midpoint of the range observed in areas of low to high moose browse use (9 - 42 percent); a browse survey in fall 2002 below Lower Kalskag on the Kuskokwim River (Unit 18) found that 78 percent of shrubs were unbrowsed and none were heavily browsed by moose; there is some indication that cows are in average or good body condition because twinning rates of 32 percent were observed in spring 2000 on the Holitna and Hoholitna Rivers, although sample sizes were small (less than 10); of 15 radiocollared cows in Unit 19(A) that had calves in 2005, five produced twins for a 33 percent twinning rate; **in 2007, 2008, and 2010 a combined twinning rate of 63% was observed**; if observations of browsing upriver and downriver from Unit 19(A), and limited observations of twinning are indicative of the situation in Unit 19(A), habitat enhancement alone is unlikely to cause a significant population increase in moose in the foreseeable future; the highest quality moose habitat in the unit is found in the lower Holitna River floodplain; high quality habitat is present in riparian areas along the Kuskokwim River and adjacent drainages; other portions of Unit 19(A) have lower quality habitat;

(xiii) [(XII)] total estimated mortality is likely high relative to the size of the moose population; information gained from studies on moose mortality in Unit 19(D)-East and other similar areas of Alaska, and observations by local residents indicate that wolves are currently a major limiting factor for moose in Unit 19(A); research from Unit 19(D)-East also indicates that black and brown bear predation is likely a factor that contributes to limiting the moose population in Unit 19(A); of 38 adult moose radiocollared in October 2003, seven had died by November 2005; moose mortality from harvest by humans is also high, relative to the population size, and regulatory proposals have been submitted to severely restrict harvest;

(xiv) [(XIII)] the number of animals that can be removed from the Unit 19(A) 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 5 AAC 92.108; the moose population in Units 19(A) and 19(B) is well below the intensive management objective set by the board; the moose population in Unit 19(A) is also well below the objective calculated by the department for the unit;

(xv) [(xiv)] without an effective wolf **and black bear and brown bear** predation control program, moose in Unit 19(A) are likely to persist in a low density dynamic equilibrium state with little expectation of increase; data from moose mortality studies,

and predator and prey studies, conducted throughout Alaska and similar areas in Canada suggest that reducing the number of wolves **and bears** in Unit 19(A) can reasonably be expected to increase the survival of calves as well as older moose, particularly yearlings; reducing wolf **and bear** predation on moose, in combination with reducing harvest, particularly of cows, can reasonably be expected to initiate an increase of the moose population towards the population objective;

(B) the human use information for prey population is as follows:

(i) the division of subsistence conducted household surveys on the subsistence use of big game in communities in Unit 19(A) between April 2003 and March 2004; moose was the most widely used and hunted animal in all eight communities surveyed; overall, 76 percent of all households in the central Kuskokwim area used moose, 57 percent of all households attempted to harvest moose, and 22 percent of all households successfully harvested one or more moose; of the estimated 107 moose harvested by the eight survey communities, 64, or 60 percent, were taken in Unit 19(A), 14 or 13 percent, were taken in Unit 18, and the remainder 27 percent were taken in other subunits of Unit 19 or in unreported locations; an estimated 426 individuals, or 28 percent of the area population, spent a total of 4,591 hunter days in pursuit of moose; to put this number in perspective, it is equivalent to a period of nearly 12.6 years, a clear testament to the importance of moose as a subsistence resource in the central Kuskokwim region; of the 426 individuals who went hunting, only 96, or 23 percent, were successful in harvesting a moose; the average number of days spent hunting by successful households per moose harvested (14.7) is higher than any previously reported numbers in the state where similar methods of data collection and analysis were employed; households were asked to compare their 2003 - 2004 harvest of moose with their harvest both five years and 10 years before, and the householders overwhelmingly noted harvesting fewer moose in 2003 - 2004;

(ii) between June 1982 and June 1983, the staff of the division of subsistence conducted extensive research on the resource use patterns and community characteristics of Chuathbaluk and Sleetmute; a comparison of that information with the 2004 data indicates a significant decline in household harvest rates; from an average of 0.55 - 0.2 moose harvested per household in Chuathbaluk and from 0.68 - 0.3 moose harvested per household in Sleetmute;

(iii) residents of Unit 19(A) have always had a high demand for moose for subsistence needs; since the 1990s when larger boats became available to residents in the lower Kuskokwim River and income from commercial fishing increased the ability to purchase fuel for long hunting trips, demand for moose in Unit 19(A) has increased; since 2004, there has been a moratorium on moose hunting in the Kuskokwim River drainage in Unit 18 and this has increased the demand for moose for subsistence purposes in Unit 19(A);

(iv) the amount necessary for subsistence established by the board for Unit 19 (including the Lime Village Management Area) is 430 - 730 moose; most of the human

population in Unit 19 is residents of communities along the Kuskokwim River in Unit 19(A); the amount necessary for subsistence for Unit 19 is also based on subsistence need by residents of Unit 18; Unit 19(A) includes the most accessible portion of Unit 19 for the main population base in the region; subsistence hunters have depended on Unit 19(A) to provide the majority of subsistence harvest in Unit 19 as a whole; harvest in Unit 19(A) is a critical component of the amount necessary for subsistence for Unit 19 and the ability to meet subsistence needs in the region;

(v) according to harvest ticket reports, the numbers of hunters and moose harvested declined substantially between the mid-1990s and 2002; the total reported moose harvested in Unit 19(A) declined from the 1994 - 1995 season (168 moose) to the 2002 - 2003 season (67 moose); in Unit 19(A), the number of moose reported harvested by local residents and other Alaska residents declined approximately 65 percent, from 138 moose to 48 moose, between 1994 - 1995 and 2002 - 2003; after the RM 640 registration permit hunt for Alaska residents was implemented in fall 2004, harvest reporting greatly improved; in 2004, reports indicate that 107 moose were harvested in Unit 19(A); during the fall of 2005, 176 moose were reported harvested; while it may appear that moose harvest increased significantly after the registration permit hunt was established, the increase is most likely attributable to better reporting rates; during 2006, 2007, and 2008, reported moose harvest was 43, 77, and 75, respectively; **during 2009 and 2010, the reported moose harvest was 58 and 84, respectively;** these lower harvests were influenced by Tier II hunt restrictions and moose hunting closures;

(vi) the average number of nonresident hunters in Unit 19(A) between 1994 - 1995 and 2002 - 2003 was 52 hunters; the peak number of nonresident hunters was 91 in 2000 - 2001; when Unit 19(A) was closed to nonresident hunting in March 2004 several guides protested vigorously that their agreements with clients could not be met and their businesses would suffer; since that time demand for nonresident hunting opportunity has not been met;

(vii) demand for moose harvest in Unit 19(A) is likely to increase in the future; if the moose hunting moratorium in Unit 18 is successful in increasing the moose population in that area it will help relieve some of the demand on Unit 19(A); still, with more than 20,000 residents in Unit 18 there will be high demand for moose throughout the region indefinitely into the future; clearly, demand is not being met now; if the wolf **and black bear and brown bear** control program is successful it will help to meet the need for moose in the region in the future; without a wolf **and black bear and brown bear** predation control program, there is a very low probability that the moose population will increase sufficiently to meet subsistence needs or other harvest demands in the future;

(C) the predator population information is as follows:

(i) the pre-control wolf population in Unit 19(A) was estimated in fall 2004 using an extrapolation technique combined with sealing records and anecdotal observations the population in the entire 9,969 square mile area was estimated at 180 - 240 wolves in 24

- 28 packs or approximately 1.8 - 2.4 wolves per 100 square miles; a revised pre-control estimate of 125 - 150 was calculated in 2006 because wolf survey data collected during early 2006 and moose survey data collected during 2005 and 2006 indicated the initial pre-control wolf population estimate was too high;

(ii) after a complete wolf survey was conducted in Unit 19(A) in January and March 2006, a total of 107 - 115 wolves was estimated in 26 - 27 packs or approximately 1.1 - 1.2 wolves per 100 square miles; a complete wolf survey was conducted again in Unit 19(A) in February 2008, a total of 74 wolves was estimated in 17 packs or approximately 0.74 wolves per 100 square miles; **in February 2011, aerial wolf surveys, pilot interviews, and harvest and control data were used to obtain fall 2010 estimates of 30 wolves in 7 packs in Unit 19(A) upriver of Sleetmute and approximately 80 wolves in all of Unit 19(A);** 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;

(iii) using the **2011** [2008] moose and wolf population estimates, the moose-to-wolf ratio in Unit 19(A) is between **35-72:1** [43:1 AND 71:1];

(iv) when present, the Mulchatna caribou herd provides an alternative source of prey for wolves in Unit 19(A); because migrations of the herd into portions of 19(A) vary each year, the herd is not consistently available to wolves in the plan area;

(v) 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 during winters 2004 - 2005 and 2005 - 2006 was 40 - 53 wolves in order to achieve a reduction of between 60 and 80 percent of the pre-control estimate of 180 - 240; beginning in winter 2006 - 2007, the wolf population control objective was changed to 30 - 36 wolves based on the revised pre-control wolf population estimate of 125 - 150; the minimum wolf population control objective will achieve the desired reduction in wolf predation, and also ensure that wolves persist within the plan area;

(vi) without a wolf predation control program, the wolf population is expected to decline somewhat due to further decline in the moose population and reduced availability of prey; the moose and wolf populations in Unit 19(A) are in a low density dynamic equilibrium state where both predator and prey numbers are likely to stay at low levels indefinitely; if wolf predation control efforts continue and the wolf population is reduced according to the wolf population and harvest objectives, the wolf population will be maintained at 30 - 36 wolves for several years, but once the moose

population increases and wolf control efforts are discontinued, the wolf population will increase in response to the increased prey base;

(vii) based on extrapolation of densities from other areas, an estimated 2,475 – 2,970 black bears exist in Unit 19(A), including approximately 135 – 160 black bears within the BCFA;

(viii) based on extrapolation of densities from other areas, an estimated 200 brown bears exist in Unit 19(A), including approximately 10 – 15 brown bears within the BCFA;

(D) the human use information for the predator population is as follows:

(i) total reported harvest of wolves in Unit 19(A) by both hunters and trappers between 1998 and 2004 ranged between 21 and 49 wolves; during the winter of 2004 - 2005, a total of 72 wolves were reported taken in Unit 19(A); of those, 43 wolves were taken in the wolf predation control program and 29 wolves were taken by trappers and hunters; during the winter of 2005 - 2006, a total of 80 wolves were reported taken in Unit 19(A); of those, 47 wolves were taken in the wolf predation control program, and 33 wolves were taken by trappers and hunters; during the winter of 2006 - 2007, a year with low snow and poor travel conditions, a total of 10 wolves were reported taken in Unit 19(A); of those, seven wolves were taken in the wolf predation control program and three wolves were taken by trappers and hunters; during the winter of 2007 - 2008, a total of 24 wolves were reported taken in Unit 19(A); of those, 15 wolves were taken in the wolf predation control program and nine wolves were taken by trappers and hunters; **during the winter of 2008 - 2009, a total of 31 wolves were reported taken in Unit 19(A); of those, 20 were taken in the wolf predation control program and 11 were taken by trappers and hunters; during the winter of 2009 - 2010, a year with low snow and poor travel conditions, a total of 12 wolves were reported taken in Unit 19(A); of those, 2 wolves were taken in the wolf predation control program and 10 wolves were taken by trappers and hunters; during the winter of 2010 - 2011, a total of 14 wolves were reported taken in Unit 19(A); of those, 10 wolves were taken in the wolf predation control program and 4 wolves were taken by trappers and hunters; it is likely that a few additional wolves (estimated 5 – 10 annually) are harvested in the area, but are used locally and do not get sealed and reported;** [IT IS LIKELY THAT A FEW ADDITIONAL WOLVES (ESTIMATED 5 - 10) ARE HARVESTED IN THE AREA, BUT ARE USED LOCALLY AND DO NOT GET SEALED AND REPORTED;]

(ii) the human population in Unit 19(A) is concentrated along the Kuskokwim River corridor; there are large portions of the unit that are remote from communities in the region and access is difficult; the central Kuskokwim 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;

(iii) in the first year of the Unit 19(A) wolf predation control program reported wolf harvest by hunters and trappers was 27 wolves, within the range of previous years' harvest; without a wolf predation control program in place wolf harvest is expected to remain relatively constant;

(iv) there is no reporting requirement for black bears harvested in Unit 19(A) and hunter harvest is believed to be low; without a black bear predation control program in place black bear harvest is expected to remain relatively constant;

(v) during 2006 – 2010, a total of 77 brown bears were reported harvested by hunters from Unit 19(A), including an average of 3 per year from the Holitna River drainage; without a brown bear predation control program in place brown bear harvest is expected to remain relatively constant;

(2) the predator and prey population levels and population objectives, and the basis for those objectives, is as follows:

(A) the **2011** [2008] estimated moose population in Unit 19(A) is **2,791 - 5,782** [3,200 - 5,275] moose; the moose population objective for Unit 19(A) is 7,600 - 9,300 moose; this objective is based on the intensive management objective for Units 19(A) and 19(B) established by the board and the proportion of the land area in the combined subunits that is within Unit 19(A); intensive management objectives were based on historical information about moose numbers, carrying capacity of the habitat, sustainable harvest levels, and human use;

(B) the revised pre-control estimated wolf population in Unit 19(A) was 125 - 150 wolves during fall 2004; 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 in order 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 19(A) will be reduced by no fewer than 30 wolves;

(C) the wolf population control objective for Unit 19(A) is 30 - 36 wolves; a minimum population of 30 wolves is within the 60 - 80 percent recommended reduction from the pre-control minimum estimated wolf population; the minimum wolf population control objective will achieve the desired reduction in wolf predation, and also ensure that wolves persist within the plan area;

(D) the pre-control estimated black bear population in Unit 19(A) was 2,475 – 2970 bears, including 135 – 160 black bears within the BCFA; the objective for the black bear predation control program is to reduce black bear numbers and black bear predation on moose to the lowest level possible within the BCFA; this plan includes a

goal to maintain black bears as part of the natural ecosystem within Unit 19(A); because the BCFA is a relatively small geographic area, removing black bears from within it will have only a minor effect on the black bear population in Unit 19(A) overall, but should significantly contribute to moose calf survival in the BCFA;

(E) the pre-control estimated brown bear population in Unit 19(A) was 200 bears, including 10 – 15 brown bears within the BCFA; the objective for the brown bear predation control program is to reduce brown bear numbers and brown bear predation on moose to the lowest level possible within the BCFA; this plan includes a goal to maintain brown bears as part of the natural ecosystem within Unit 19(A); because the BCFA is a relatively small geographic area, removing brown bears from within it will have only a minor effect on the brown bear population in Unit 19(A) overall, but should significantly contribute to moose calf survival in the BCFA;

(3) the justifications for the predator control implementation plan are as follows:

(A) the estimated **2011** [2008] density of the moose population in Unit 19(A) is in the range of **0.28 – 0.58** [0.32 - 0.53] moose per square mile with a population of **2,791 - 5,782** [3,200 - 5,275] moose; based on current estimates of recruitment, density, and bull-to-cow ratios, there is no harvestable surplus in eastern Unit 19(A) upstream from and excluding the George River), excluding the Lime Village Management Area; in western Unit 19(A) (downstream from and including the George River), the harvestable surplus is 60 bulls, using a conservative harvest rate for bulls that is based on three percent of the estimated population; harvestable surplus is not sufficient to provide the amount of moose necessary for subsistence purposes or provide for nonsubsistence uses; the moose population and harvest objectives for Unit 19(A) are not being met because mortality has exceeded recruitment into the population causing a decline in moose numbers; wolf, **black bear and brown bear** predation is an important cause of moose mortality;

(B) kill rates by wolves are affected by availability of moose, snow depth, number of alternate prey, size of wolf packs, and other local factors; 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;

(C) black bear and brown bear predation is likely a major cause of moose calf mortality; in nearby Unit 19D-East, a 96 percent and 50 percent reduction in black bears and brown bears, respectively, resulted in increased survival rates during summer;

(D) [C] reducing wolf, black bear and brown bear numbers through a wolf, black bear and brown bear predation control program, combined with reduction in moose harvest is the approach most likely to succeed in a recovery of the moose population; wolf harvest through hunting and trapping efforts and black bear and brown bear through hunting efforts has not resulted in lowering the wolf, black bear and brown bear populations sufficiently to allow the moose population to grow; a regulation change in March 2002 to allow the use of snowmachines to take wolves has not resulted in a measurable increase in

wolf harvest; public information and education programs have been implemented in the central Kuskokwim region to improve understanding of the biological effect of killing cow moose and the potential benefits to the moose population of increasing harvest of wolves and bears; education should help in the long-term but is not expected to result in a significant increase in the moose population in the short-term; Unit 19(A) was closed to nonresident hunting and a registration permit system for resident hunters was established in 2004; beginning in fall 2006, moose hunting was closed upstream from and excluding the George River drainage and excluding the Lime Village Management Area; a Tier II permit hunt was implemented downstream from and including the George River drainage; these changes were made in response to new information obtained during 2005 surveys;

(E) [D] presently known alternatives to predator control for reducing the number of predators are ineffective, impractical, or uneconomical in the Unit 19(A) 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 19(A); the numbers of hunters and trappers are relatively low and educational programs to stimulate interest and improve skills in taking wolves are in the early stages of development, and 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, **black bears and brown bears** is impractical because it is expensive and it is very difficult to find publicly acceptable places for relocated wolves, **black bears and brown bears**; 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;

(F) [E] moose hunting seasons and bag limits have been reduced in Unit 19(A); in 2004 - 2005, the nonresident season in Unit 19(A) was closed and resident hunters in Unit 19(A) were required to have a registration permit; the resident winter moose hunting season in Unit 19(A) was eliminated to reduce overall harvest and eliminate incidental cow harvest to improve the reproductive potential of the population; beginning in fall 2006, moose hunting in the eastern part of Unit 19(A) outside the Lime Village Management Area was closed and the remainder of Unit 19(A) was limited by Tier II permit; while helpful, these measures alone will not likely stop the decline in the moose population and they will not be enough alone to allow the moose population to increase;

(G) [F] without an effective wolf, **black bear and brown bear** predation control program, the wolf, **black bear and brown bear** harvest objectives cannot be achieved and moose in

Unit 19(A) are likely to persist in a low density dynamic equilibrium state with little expectation of increase; data from moose mortality studies, and predator and prey studies, conducted throughout Alaska and similar areas in Canada suggest that reducing the number of wolves, **black bears and brown bears** in Unit 19(A) can reasonably be expected to increase the survival of calves as well as older moose; reducing wolf, **black bear and brown bear** predation on moose, in combination with reducing harvest, particularly of cows, can reasonably be expected to initiate an increase of the moose population towards the population objective; aerial wolf predation control makes it possible to increase the take of wolves over large expanses of territory in a vast and remote region like the majority of Unit 19(A); **aerial black bear and brown bear control is an effective technique for reducing bear numbers and bear predation on moose;** with a reduction in wolf **and bear**-caused mortality and restrictions in harvest, the moose population is expected to grow;

(4) the permissible methods and means used to take wolves, **black bears and brown bears** are as follows:

(A) hunting and trapping of wolves **and hunting of black bears and brown bears** by the public in Unit 19(A) 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) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land and shoot permits as a method of wolf removal under AS1605.783;

(C) notwithstanding any other provisions in this title, the commissioner may reduce the black bear population within the BCFA using department employees to conduct aerial, land and shoot, and/or ground based lethal black bear removal of any sex and age of black bear using state owned, privately owned, or chartered equipment, including helicopters under AS1605.783;

(D) notwithstanding any other provisions in this title, the commissioner may reduce the brown bear population within the BCFA using department employees to conduct aerial, land and shoot, and/or ground based lethal brown bear removal of any sex and age of brown bear using state owned, privately owned, or chartered equipment, including helicopters under AS1605.783;

(5) the anticipated time frame and schedule for update and reevaluation are as follows:

(A) for up to five years beginning on July 1, 2009, the commissioner may reduce the wolf, **black bear and grizzly bear** populations in Unit 19(A);

(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 control activities:

(i) when wolf inventories or accumulated information from permittees indicate the need to avoid reducing wolf numbers below the management objective of 30 wolves 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, **black bear and brown bear** 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;

(C) [D] the commissioner will annually close wolf hunting and trapping seasons as appropriate to ensure that the minimum wolf population objective is met.

...