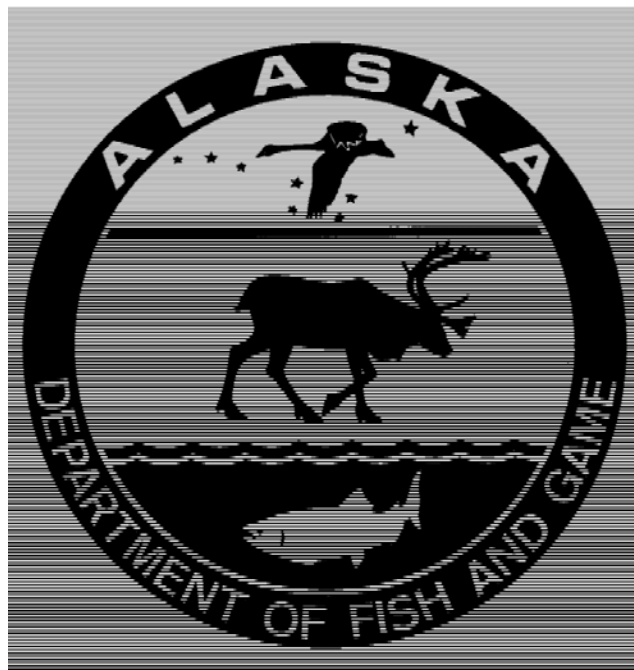


ALASKA DEPARTMENT OF FISH AND GAME
STAFF COMMENTS
CENTRAL/SOUTHWEST REGION IV PROPOSALS
ALASKA BOARD OF GAME MEETING
WASILLA, ALASKA
FEBRUARY 13 - 20, 2015



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, February 13 – 20, 2015 in Wasilla, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

PROPOSAL 39 – 5 AAC 85.045 (a)(16). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose season in the Remainder of Unit 18.

WHAT ARE THE CURRENT REGULATIONS? Antlerless hunting during fall and winter seasons is allowed in the Remainder of Unit 18 (excluding the Kuskokwim hunt area and excluding the portion of Unit 18 south of the Eek River drainage). There are three components to antlerless seasons, as follows: 1) during Aug 1–Sept 30 the bag limit is 2 moose; however, only one antlered bull may be taken and taking calves or cows accompanied by calves is prohibited; 2) during Oct 1–Nov 30 the bag limit is 2 antlerless moose with no additional restrictions; and 3) during Dec 1–Mar 15 the bag limit is 2 moose with no additional restrictions.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The antlerless hunts in the Remainder of Unit 18 would be reauthorized for RY2015. Hunters would have the same seasons and bag limits as RY2014 (see Current Regulations above).

BACKGROUND: Antlerless moose seasons must be reauthorized annually. Prior to RY2014, the portions of Unit 18 covered in this reauthorization included the Lower Yukon River hunt area and the Unit 18 Remainder hunt area. Combined together they become the current Remainder of Unit 18, which supports moose populations that have increased to all-time high levels reaching an estimated minimum population of 12,000 moose. In all areas surveyed, moose populations are increasing with high twinning rates (at or above 40%) and calf to adult ratios that are 37:100 and 36:100. Reported harvest in the past three years has been an average of 371 bulls and 121 cows.

Harvests have been stable in the past five years despite increased season length and liberalized bag limits initiated in RY2010. The effects of further liberalization in RY2014, applied to the current expanded Remainder of Unit 18, have not been assessed because hunts are still in progress, although trends appear to be similar. In RY2013, the harvest of 190 moose from the Lower Yukon River hunt area included 49 antlerless moose (cows) taken in a winter hunt, along with the harvest of 343 moose from the Unit 18 Remainder hunt area including 120 antlerless moose (cows) taken in a winter hunt. The combined harvest for the current Remainder of Unit 18 represented in this reauthorization is well within sustained yield and population trajectory has not been affected by antlerless harvests.

The Remainder of Unit 18 has under-utilized moose habitat and is expected to support a growing moose population. Continuing antlerless moose harvest opportunity will benefit hunters and may also help slow the growth rate of the population.

The board has made a positive customary and traditional use finding for moose in Unit 18, and has found that 200–400 moose are reasonably necessary for subsistence (5 AAC 99.025(a)(8)).

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to maintain antlerless hunts in areas where moose populations are increasing.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 40 – 5 AAC 85.045(a)(20). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Reauthorize the antlerless moose seasons in Unit 22(C) and Unit 22(D) Remainder.

WHAT ARE THE CURRENT REGULATIONS? The current regulation allows for an antlerless hunt by registration permit in Unit 22(C) during Sept 15 – Sept 30, but this hunt was closed by emergency order in RY2014. An antlerless hunt is open by harvest ticket in Unit 22(D) Remainder during Dec 1 – Dec 31 with a bag limit of one moose; however, the take of calves or cows accompanied by calves is prohibited.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The option for antlerless hunts in Units 22(C) and 22(D) Remainder would be retained; however, in RY2015 and longer if necessary, both hunt areas would be closed to antlerless harvest by emergency order due to current population status (see Background). Opening antlerless hunts in the future would depend on population status in relation to carrying capacity and management objectives in each hunt area.

BACKGROUND: Antlerless moose seasons must be reauthorized annually. In October 1999, the board authorized a registration hunt for antlerless moose in Unit 22(C) and the department managed this hunt with a quota of up to 33 permits annually from RY2000 through RY2012. This was during the time when the population was above its management objective of 450-525 moose and believed to be at or near winter range carrying capacity with populations of 620 and 660 moose based on additional counts completed in RY2007 and RY2011, respectively. Lowering the population through additional bull harvest was ill-advised due to low bull:cow ratios, ranging from 10-20 bulls:100 cows.

Instead, issuing antlerless permits in Unit 22(C) was used to yield harvests of 8-24 antlerless moose per year since RY2000 to achieve population reduction and stabilization. This approach successfully reduced the population to the current estimate of 430 moose in February 2013. Although the department has the latitude of issuing antlerless permits, no permits were issued for RY2013 and RY2014 because the population was lowered to within management guidelines. We will consider antlerless hunts when factors suggest the population is increasing to levels where nutrition and reproduction indicate the population may be getting too large for available habitat. Retaining the antlerless authorization gives flexibility to the department in future hunt management.

In Unit 22(D) Remainder, the moose population grew 1% annually during the period 1997–2011 and the estimated number of moose increased from 578 in 1997 to 700 in 2011. This area typically showed higher calf:cow and calf:adult ratios than other parts of Unit 22, and surveys found 14–35ca:100ad with an average of 23ca:100ad since 1988. However, a spring moose population survey completed in 2014 found 491 moose in Unit 22(D) Remainder which represents a 14% annual rate of decline since 2011.

Reported antlerless harvest in this area has been low, averaging 1 cow moose per year since RY2000, and community-harvest survey data show that harvests of 5 and 1 cow moose, respectively in RY2000 and RY2012, are likely more realistic estimates of annual cow harvest compared to harvest ticket reports. Although the Unit 22(D) Remainder population has historically remained below the population objective of 1,600 moose, antlerless opportunity has been provided because the population experienced modest levels of long-term growth and it was believed that low levels of antlerless harvest had little or no detrimental effect on the population. The current population decline indicates that antlerless harvest is no longer warranted and conservative harvest rates with bull-only bag limits should be used until the population status changes.

Retaining the antlerless authorization in Unit 22(D) Remainder gives flexibility to the department in future hunt management. The current plan is to close antlerless hunts (as long as necessary) by emergency order because the population has declined. Antlerless hunts will be considered again when factors suggest the population has increased and is in a similar condition to the period when antlerless hunts were previously offered (prior to 2011).

The board has made a positive customary and traditional use finding for moose in Unit 22, and has found that 250–300 moose are reasonably necessary for subsistence (5 AAC 99.025(a)(8)).

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to retain antlerless hunts. The department does not plan to administer the Unit 22(C) or Unit 22(D) Remainder antlerless hunt when the population is within or below population objectives, but the proposal gives the department flexibility to administer the hunts in the future if populations increase above population objectives before the next cycle of board meetings.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 41 – 5 AAC 85.045(a)(21). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal would reauthorize the antlerless moose season in Unit 23.

WHAT ARE THE CURRENT REGULATIONS? There are two moose hunt areas in Unit 23 and each area has an antlerless moose season from Nov 1 – Dec 31. The hunt areas are: 1) Unit 23 north of and including the Singoalik River drainage, and 2) Remainder of Unit 23. The bag limit in each area is one moose by registration permit (RM880); however, the taking of calves or cows accompanied by calves is prohibited.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The antlerless moose hunts in Unit 23 would be reauthorized. Resident hunters would be able use a registration permit to harvest antlerless moose during November and December on state-managed lands in Unit 23.

BACKGROUND: Antlerless moose seasons must be reauthorized annually. The resident registration permit hunt was implemented in RY2004 as a way to retain antlerless opportunity through substantially

shortened seasons limiting antlerless harvest to the months of November and December. Antlerless seasons and bag limits have not changed since RY2004 and the reported harvest of antlerless moose has been approximately 10-12 cows annually over the last 20 years. The low antlerless moose harvest rates allow additional harvest opportunity for resident hunters without negatively impacting the moose population.

Aerial censuses indicate low moose densities prevail throughout Unit 23; however, the probable take of a few antlerless moose is not expected to be detrimental to the population.

The board has made a positive customary and traditional use finding for moose in Unit 23, and has found that 325–400 moose are reasonably necessary for subsistence (5 AAC 99.025(a)(8)).

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal to reauthorize antlerless harvests in Unit 23.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 42 - 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose season in the western portion of Unit 26(A).

WHAT ARE THE CURRENT REGULATIONS? Antlerless moose hunts for residents only are allowed in two hunt areas in Unit 26(A). One area is the Colville River drainage upstream from, and including the Anaktuvuk River drainage, where antlerless hunting through a 1 moose bag limit is allowed Feb.15 – Apr. 15. The other area is the portion of Unit 26(A) west of 156° 00' W. longitude, excluding the Colville River drainage, where antlerless hunting through a 1 moose bag limit is allowed July 1 – Sept. 14.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The portion of Unit 26(A) west of 156° 00' W. longitude and north of the Colville drainage would have the antlerless moose season reauthorized. The antlerless winter hunt in the Colville River drainage (upstream from and including the Anaktuvuk River drainage) would not be reauthorized.

BACKGROUND: Antlerless moose seasons must be reauthorized annually. The moose population is low in Unit 26(A) and has declined since 2008. The minimum population count was 1,180 in 2008, then declined to 610 moose in 2011. The population grew slowly from 2011–2013, but declined to 294 moose in 2014. Reported moose harvest in recent years has remained low: 13 moose in 2010, 5 in 2011, 9 in 2012, and 6 in 2013.

Because of the decline in 2014 the department issued an Emergency Order that closed the Unit 26(A) fall drawing hunts (DM980/981) and the winter antlerless hunt in portions of the Colville River drainage. If the population does not show signs of recovery, the department will close the drawing hunts in RY2015. The antlerless hunt in the Colville River drainage will remain closed through the action of this proposal.

The portion of Unit 26(A) west of 156° 00' W longitude and north of the Colville drainage does not have a year-round moose population. Animals occasionally disperse away from the major river drainages to the coastal plain during summer months. These are the only moose available for harvest in this northwestern portion of Unit 26(A). The small number of antlerless moose harvested under this reauthorization proposal will have very little impact on the size of the population. To date, after several years of hunting opportunity in this area, three antlerless moose have been harvested: one cow in 2006, one in 2008, and one in 2014. Keeping an antlerless moose season in this portion of Unit 26(A) is a way to provide opportunity in a portion of the state that does not generally have moose.

The board has made a positive customary and traditional use finding for moose in Unit 26, and has found that 21–48 moose are reasonably necessary for subsistence, including 15–30 in Unit 26A (5 AAC 99.025(a)(8)).

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal since antlerless harvests in the western section of Unit 26(A) are anticipated to be very low and have little impact on the population. The department also supports not reauthorizing the winter antlerless hunt on the Colville River because of low population numbers.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 43 – 5AAC 92.015(a)(4), (8), (9) and (13); and 5AAC 92.015(b)(4), (7), (8) and (10).
Brown bear tag fee exemptions.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? The proposal would reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26(A).

WHAT ARE THE CURRENT REGULATIONS? Brown bear tag fees are not required for residents in general season hunts and subsistence registration permit hunts in Units 18, 22, 23, and 26(A). The \$25 locking tag for residents is not required in general season hunts. The subsistence hunt for residents with no tag requirement is managed through a registration permit in each unit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The \$25 resident tag fee would not be required in general season hunts for brown bears in Units 18, 22, 23, 26(A). Subsistence hunts would not have a \$25 tag fee, although subsistence registration permit would be required.

BACKGROUND: The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically becomes reinstated. General season hunts have had fees exempted in Unit 18 for 3 years, Unit 22 for 13 years, Unit 23 for 8 years, and Unit 26(A) for 3 years. Exemptions have been implemented to allow: 1) incremental increases in harvest, 2) additional opportunity for residents, and 3) harvest by a wide range of users. Increased harvest is allowable because portions of these units have high bear populations. General season harvests are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest.

In subsistence season hunts, reauthorizations are needed for Units 18, 22, 23, and 26(A) where brown bear subsistence hunt requirements include: 1) a registration permit; 2) a tag fee exemption; 3) salvaging meat for human consumption; 4) no use of aircraft in Units 22, 23 and 26(A); 5) no sealing requirement unless hide and skull are removed from subsistence hunt area; and 6) if sealing is required, the skin of the head and the front claws must be removed and retained by the department at the time of sealing. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by the department for subsistence hunts. In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. Brown bear numbers are stable or increasing and the increased harvests that result from the tag fee exemption do not present a conservation concern.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 44 – 5 AAC 85.045 (8). Hunting seasons and bag limits for moose

PROPOSED BY: Lake Iliamna Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal liberalizes the winter bag limit for moose in Unit 9B from one antlered bull to one bull.

WHAT ARE THE CURRENT REGULATIONS? Hunters are currently allowed to take one bull by registration permit (RM272) from September 1–15 or 1 antlered bull from December 15–January 15.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal liberalizes the moose bag limit during the winter moose season in Unit 9B by removing the antler requirement for legal bulls. This change would increase the harvest of bulls in Unit 9B by making all bulls legal for harvest and could lead to the harvest of a few cows during a period when many bulls have lost their antlers.

BACKGROUND: The current regulations were developed by the Unit 9 Moose Working Group in 2010 and adopted by the Alaska Board of Game (BOG) in 2011. At the time the Lake Iliamna Advisory Committee voted unanimously in support of the regulations.

The antlered bull bag limit, currently in place, was designed to protect a segment of the bull population while still providing opportunity to harvest moose during the month long winter season. Bulls that lose their antlers are protected by the current bag limit, while bulls that retain their antlers may be legally taken. Antler loss, particularly for older bulls, starts in early December, while some young bulls retain their antlers as late as mid-February.

The bag limit was also designed to offer more protection to cow moose that could be mistaken for a bull that lost its antlers. Cow harvest would reduce the reproductive potential of this low-density population and remains a concern in this area.

Late-season bull harvest reported during the last 10 years in 9B averaged 13 bulls annually, but during the last 2 winters reported bull harvest was only 8 and 5 (2012 and 2013, respectively). Poor snow conditions probably contributed to lower winter harvest. During the snowy winter of 2011 there were 18 bulls taken in 9B under the current antlered bull regulation.

A survey conducted in 2013 indicated a ratio of 34 bulls:100 cows, which was below the objective of 40 bulls: 100 cows, and 23 calves:100 cows.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because the moose population in Unit 9B is below the management objective for bull ratio. Liberalizing the bag limit for bulls would further decrease the bull ratio and the availability of bulls for harvest. The department also has concern about the potential harvest of cow moose, which cannot be supported in this low-density moose population.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 45 – 5 AAC 85.020 (8). Hunting seasons and bag limits for brown bear.

PROPOSED BY: Lake Iliamna Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal liberalizes the resident season and bag limit for brown bears in Unit 9B to a season that occurs every spring and every fall and a bag limit of one bear every year.

WHAT ARE THE CURRENT REGULATIONS? Hunters are currently allowed to harvest bears under three different hunts in Unit 9B.

- Resident and nonresident hunters are allowed to take 1 bear every 4 years by registration permit (RB369 and RB370) during seasons that occur every other regulatory year.
- A registration subsistence hunt (RB502) also allows resident hunters to take one bear per year from September 1–May 31, provided the meat is salvaged for human consumption.
- Residents are also allowed to take 1 bear every regulatory year within 5 miles of designated villages by registration permit (RB525), which is open year-round.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would liberalize the season and bag limit for resident brown bear hunters (RB369 and RB370). The proposal recommends a bear hunting season that occurs every year, which would replace the every other year season that occurs during the fall of odd numbered years and the spring of even numbered years. The proposal also liberalizes the brown bear bag limit from 1 bear every 4 years to 1 bear every year.

BACKGROUND: The intent of this proposal is to reduce the brown bear population to increase moose calf survival and reduce bear-human conflicts. However, changing the brown bear seasons and bag limits in Unit 9B will not reduce the bear population to sufficient levels to reduce bear predation on calves. Additionally, opportunity to take brown bear involved in bear-human conflicts is already provided by the near-village registration hunt (RB525).

Although we know that both bears and wolves prey on moose, we have not identified factors limiting moose abundance in Unit 9B. Fundamentally, Unit 9 has excellent and extensive brown bear habitat and limited moose habitat. For this proposed regulation to successfully reduce brown bear predation on moose, it would require an unattainable level of brown bear harvest, and brown bears are historically recognized for subsistence uses, for their trophy value, and for viewing opportunities in Unit 9. It also is unlikely that bear predation could be sufficiently reduced without allowing hunters to also take sows with cubs and cubs, which many are reluctant to do.

The low participation of resident hunters and large expense of bear hunting impose a greater limitation on the number of bears that an individual will shoot, as compared to changing the current season and bag limit. Bear harvests in most areas of Unit 9 are limited by the guiding industry, transporter availability, and limited concessions available on federal lands. Local residents already have the opportunity to take more bears under the near-village hunt (RB525) and subsistence hunt (RB502).

The BOG has made positive customary and traditional use findings for brown bears in units 9B and 9E, and negative findings in units 9A, 9C, and 9D. The BOG has found that 10–20 brown bears are reasonably necessary for subsistence in Unit 9B, and 10–15 brown bears are reasonably necessary for subsistence in Unit 9E.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because the additional hunting opportunity would undermine the ability of the near-village hunt to target bears involved in bear-human conflicts. RB525 was specifically designed with liberal seasons and bag limits to focus a portion of the bear harvest on bears near villages that were more likely to be involved in bear-human conflicts. Additionally, given the already liberal hunting opportunity for resident hunters, it is unlikely to have the intended effect of increasing bear harvest sufficiently to improve moose calf survival.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 46– 5 AAC 85.020 (9). Hunting seasons and bag limits for brown bear.

PROPOSED BY: Rod Schuh

WHAT WOULD THE PROPOSAL DO? This proposal extends the spring brown bear season on Unimak Island in Unit 10 by changing the season closure dates from May 25 to May 31.

WHAT ARE THE CURRENT REGULATIONS?

- Resident and nonresident hunters are allowed to take 1 bear every 4 years by drawing permit from October 1–December 31 (DB375) or from May 10–25 (DB376).
- Resident hunters may also take 1 bear every year within 3 miles of False Pass, no closed season (RB525).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposed season extension would allow more time for guides and hunters to access Unimak and potentially fill permits. The additional 6 days in the season is expected to improve quality of hunting opportunity in the spring because weather often limits access and hunting time.

BACKGROUND: Historically, 16 drawing permits were issued annually for Unimak Island, including one Governor’s Tag, and the average harvest was 8 bears per year. During the 2013 Board of Game meeting in Wasilla, the board increased the limit on the number of permits that the department can offer for this hunt. In regulatory year 2014, the department issued 24 drawing permits for brown bear on Unimak Island. The season is still occurring and the results are unavailable at this time.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because there are no biological concerns associated with extending the spring season. The number of bears taken on Unimak would still be managed by the department which has the authority to adjust the number of drawing permits issued.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 47 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: Nushagak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal extends the spring portion of the Mulchatna caribou hunting season in Unit 17 by changing the closing date from March 15 to March 31, adding 16 days to the season length. However, the authors propose that the new season dates would only be incorporated in codified regulation. The season dates printed on the permits (RC503) and in the Alaska Hunting Regulations book would remain August 1–March 15. Adoption of the proposal would give the department the latitude of using emergency order authority to extend the season to March 31 if additional harvest opportunity is warranted.

WHAT ARE THE CURRENT REGULATIONS?

- The current caribou hunting season for most of Unit 17 (that portion that includes the Mulchatna Caribou Herd (MCH)) runs from August 1–March 15.
- This hunt is managed under a single registration permit (RC503) that encompasses the entire MCH range, and includes all of Units 17B, 18, 19A, 19B, 9A, 9B, and portions of Units 9C, 17A, and 17C.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would have little effect on the management of the Mulchatna caribou herd because the season extension would not be printed on the registration permits or in the Alaska Hunting Regulation book. As a result, the present season closure date (March 15) would be enforced as the closing date of the caribou hunting season in Unit 17 as listed on the conditions of the permit. Additionally, the department retains its emergency order authority to extend seasons based on new biological information. With March 31 specified in codified regulation, the only real change would be that manner in which the emergency order extending the season would be processed prior to March 31.

The proposal also removes the alignment of season dates listed in codified between Unit 17 and other game management units that the Mulchatna herd occupies (Units 9A, 9C, 9B, 18, 19A, and 19B). The authors of this proposal recognize that, and suggest an agenda change request be made for the February 2015 board meeting to address changes in season dates for entire MCH hunt.

BACKGROUND: The Mulchatna caribou herd has gone through a very dramatic fluctuation in population size over the past 20 years, with an estimated population of 200,000 animals in 1996 to approximately 26,000 in 2014. With that change in herd size, the harvest strategy for managing this herd has changed as well. The hunting season extended to April 15 during the peak in population size and was shortened to March 15 in 2006 after the herd declined to fewer than 50,000 animals. The earlier closure was initiated to reduce harvest, which typically increased in the spring as days got longer and weather more favorable for travel. The harvest reduction was intended to address the concern that the harvests could lead to a further decline in caribou or inhibit the recovery of this population.

The shorter spring season that was adopted by the board in 2006 has been challenged several times since then, as evidenced by proposals in 2011 and 2013, to extend the season either to the end of March or even into April to provide more hunting opportunity during the spring season. These proposals were not adopted and the department did not support the longer spring season for caribou because calf recruitment was poor and the bull ratio was below management objectives. There was also a lot of uncertainty about how many caribou were being taken, but not being reported. A longer spring season would increase the potential of harvesting too many caribou if hunters took advantage of longer days using snowmachines and airplanes.

Poor winter snow conditions that limit travel and access to caribou is cited as the main reason for wanting additional hunting opportunity, but the distribution of caribou can also have a large impact on the number of caribou taken during the winter season. In some years the lack of snow can prevent access to much of the MCH range, but there are other years when the travel conditions in March are exceptional to where an additional two weeks of the season could result in a large increase in harvest.

The near complete lack of snow during the winter of 2014 followed by improved conditions toward the end of March when the season was already closed prompted this most recent proposal. The reported harvest for the Mulchatna herd was only 104 caribou during regulatory year 2013, which is the lowest seen in more than 25 years.

The most recent caribou composition survey in October 2014 yielded a bull ratio of 35 bulls:100 cows, which is the highest observed since 2002 and is at the management objective of 35 bulls:100 cows. The calf ratio is at 30 calves:100 cows, which is the second highest observed since 1998. These indices look promising and suggest that the population will grow over the next few years if this trend continues. The overall number of caribou in the MCH is at an estimated 26,000 caribou which is still below our minimum population objective of 30,000 animals.

The BOG has made a positive customary and traditional use finding for the MCH in GMUs 9A, 9B, 17, 19A (that portion south of the Kuskokwim River), and 19B, and set the amount reasonably necessary at 2,100–2,400 caribou. Unit 18, the remainder of Unit 19, and Unit 9C are not referenced in the positive customary and traditional use finding for the Mulchatna herd.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposed season extension because of the recent improvement seen in the Mulchatna herd, but would prefer to offer the new season closure dates on the RC503 permit and in the hunting regulations. The department would then use its Emergency Order authority to reduce the season length if needed to adjust the harvest.

The department will need to evaluate the harvest in late-March to make sure it is sustainable, but the RC503 permit should provide enough real time data to allow the department to make in-season management decisions. The new registration permit requirement adopted at the 2013 Board of Game meeting should substantially improve our harvest tracking ability over the general season harvest ticket that was used previously. We are currently in the second year for the RC503 registration permit, and hunters are getting more comfortable with this permit system. The requirement to report any caribou harvest within five days of kill should keep us abreast of the harvest to help us anticipate any concerns with excessive harvest.

The board may want to address customary and traditional use findings.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 48 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: Igiugig Village Council

WHAT WOULD THE PROPOSAL DO? This proposal extends the caribou hunting season in Units 9B and 17B by changing the closing date from March 15 to March 30, adding 15 days to the season.

WHAT ARE THE CURRENT REGULATIONS?

- The present caribou hunting season for most of Unit 17 (that portion that includes the Mulchatna Caribou Herd (MCH)) runs from August 1–March 15.
- This hunt is managed under a single registration permit (RC503) that encompasses the entire MCH range, and includes all of Units 9A, 9B, 17B, 18, 19A, 19B, and portions of Units 9C, 17A, and 17C.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal adds 15 days to the caribou hunting season in Units 9B and 17B, providing additional opportunity to harvest Mulchatna caribou. The ability of hunters to take advantage of this opportunity will depend on the distribution of caribou in late March and snow conditions for winter travel.

The proposal also removes the alignment of season dates listed in codified for Units 17B and 9B and other game management units that the Mulchatna herd occupies (Units 9A, 9C, 17A, 17C, 18, 19A, and 19B).

BACKGROUND: The Mulchatna caribou herd has gone through a very dramatic fluctuation in population size over the past 20 years, with an estimated population of 200,000 animals in 1996 to approximately 26,000 in 2014. With that change in herd size, the harvest strategy for managing this herd has changed as well. The hunting season extended to April 15 during the peak in population size and was shortened to March 15 in 2006 after the herd declined to fewer than 50,000 animals. The earlier closure was initiated to reduce harvest, which typically increased in the spring as days got longer and weather

more favorable for travel. The harvest reduction was intended to address the concern that the harvests could lead to a further decline in caribou or inhibit the recovery of this population.

The shorter spring season that was adopted by the board in 2006 has been challenged several times since then, as evidenced by proposals in 2011 and 2013 to extend the season either to the end of March or even into April to provide more hunting opportunity during the spring season. These proposals were not adopted and the department did not support the longer spring season for caribou because calf recruitment was poor and the bull ratio was below management objectives. There was also a lot of uncertainty about how many caribou were being taken, but not being reported. A longer spring season would increase the potential of harvesting too many caribou if hunters took advantage of longer days using snowmachines and airplanes.

Poor winter snow conditions that limit travel and access to caribou are often cited as the main reasons for wanting additional hunting opportunity, but the distribution of caribou can also have a large impact on the number of caribou taken during the winter season. In some years the lack of snow can prevent access to much of the MCH range, but there are other years when the travel conditions in March are exceptional to where an additional two weeks of the season could result in a large increase in harvest.

The reported harvest for the Mulchatna herd was only 104 caribou during regulatory year 2013, which is the lowest seen in more than 25 years.

The most recent caribou composition survey in October 2014 yielded a bull ratio of 35 bulls:100 cows, which is the highest observed since 2002 and is at the management objective of 35 bulls:100 cows. The calf ratio is at 30 calves:100 cows, which is the second highest observed since 1998. These indices look promising and suggest that the population will grow over the next few years if this trend continues. The overall number of caribou in the MCH is at an estimated 26,000 caribou which is still below our minimum population objective of 30,000 animals.

The BOG has made a positive customary and traditional use finding for the MCH in GMUs 9A, 9B, 17, 19A (that portion south of the Kuskokwim River), and 19B, and set the amount reasonably necessary at 2,100–2,400 caribou. Unit 18, the remainder of Unit 19, and Unit 9C are not referenced in the positive customary and traditional use finding for the Mulchatna herd.

DEPARTMENT COMMENTS: The department **SUPPORTS** the proposal to extend the caribou season length in Units 9B and 17B and recommends **AMENDING** the proposal with a new closing date of March 31 to align it with the season dates in Proposal 47.

The department will need to evaluate the harvest in late-March to make sure it is sustainable, but the RC503 permit should provide enough real time data to allow the department to make in-season management decisions. The new registration permit requirement adopted at the 2013 Board of Game meeting should substantially improve our harvest tracking ability over the general season harvest ticket that was used previously. We are currently in the second year for the RC503 registration permit, and hunters are getting more comfortable with this permit system. The requirement to report any caribou harvest within five days of kill should keep us abreast of the harvest to help us anticipate any concerns with excessive harvest.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 49 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal extends the period in which a winter moose season may be offered in Unit 17A without changing the season length (31 days), and changes the bag limit during the winter hunt to “an antlered bull” if and when the “antlerless moose season closes prior to the bull season”. This proposal also reauthorizes the antlerless portion of this hunt.

WHAT ARE THE CURRENT REGULATIONS?

- The current regulations for the Unit 17A moose hunt allow resident hunters a bag limit of two moose per regulatory year.
- A fall hunt during August 25–September 20 for resident hunters is managed under registration permit RM573, with a bag limit of one bull moose.
- The winter hunt is managed through the use of two registration permits: RM575 for one bull moose, and RM576 for one cow moose. The regulations state that “up to a 31-day season may be announced December 1–January 31”.
 - The winter hunt is opened by emergency order authority, when good snow conditions exist for winter travel.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes the antlerless portion of this hunt, and recommends two changes to the present season and bag limit for the winter moose hunt in Unit 17A. The first change is to extend the period in which a winter season may be offered by one month to provide hunters with better opportunity to harvest moose. In recent years, marginal snow conditions due to warmer winter weather patterns have prevented hunters from accessing hunt areas with snow machines, which are the main form of travel during the winter moose season. Extending the season through February will give managers an additional month within which to open the moose season should the weather conditions dictate a later season opening.

The second change recommended is revising the winter season bag limit from 2 moose of either sex to “1 antlerless moose and 1 antlered bull”. This change provides additional protection for cow moose when the antlerless hunt is closed and protects a segment of the bull population. Under the proposed hunt structure hunters can obtain two registration permits for the winter season, RM575 for one antlered bull and RM576 for one antlerless moose. When these hunts are running concurrently hunters will often have both permits and can harvest an antlerless moose and an antlered bull legally. However, when the antlerless season is closed because the quota is met, hunters would be limited to an antlered bull moose. This modification protects a segment of the bull population and will be very important when winter travel conditions are good and participation in the hunt is too high to protect the bull segment of the population from overharvest.

BACKGROUND: Moose are relative newcomers to much of Unit 17A, with only about 35 animals being present along the eastern border in 1980. Since then, moose have continued increase in population

size and expand throughout Unit 17A and west into Unit 18. The most recent survey in 2011 enumerated 1,166 moose in Unit 17A, but no subsequent surveys have been conducted.

Moose management in Unit 17A has been guided by the Unit 17A Moose Management Group, consisting of members from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game. This group produced a Unit 17A Moose Management Plan that went through several iterations during 1996–2013, with the 2013 plan being used as the guiding document today. This plan has goals and objectives for hunter opportunity, harvest allocation, habitat mapping and population monitoring.

Per the moose management plan, a draw hunt for nonresident hunters was adopted by the board in 2013, with fall 2014 being the first year of that hunt. The impetus behind the nonresident hunt was abundant opportunity provided by this growing moose population, and objectives within the plan that provide for the nonresident opportunity when the moose population reaches a certain level. It is this same abundance that allows for the annual bag limit of two moose including up to 10 antlerless animals that residents can take advantage of.

The BOG has made a positive customary and traditional use finding for moose in Unit 17, and has found that 100–150 are reasonably necessary for subsistence.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because it provides greater protection for the moose population, while still offering liberal seasons and bag limits. The moose population in this area is increasing and is near the upper limit of the population objectives. While the liberal seasons and bag limits are needed to manage the population, the department is concerned that it may be difficult to manage harvests within the small quotas given the amount of interest in the hunt. The proposed changes to the season will provide users with greater opportunity to harvest moose in years where the travel conditions are not adequate in December and January and provide more consistent hunting opportunity in those years where weather conditions prevent access to moose until later in the season.

The proposed “antlered bull” bag limit is intended to help keep the moose harvest within sustainable limits by providing additional protection for both cow and bull moose. The winter bag limit change reduces the potential for cow harvest after the cow quota has been met, which is not desirable for the management of this small population or for the hunter who mistakenly harvests a cow. It also helps hunters identify legal animals from a greater distance without disturbing the moose. The bag limit also protects a segment of the bull population from harvest. Given the volume of interest in this hunt, it will be very easy to take too many bulls when travel conditions are good and communication with successful hunters is poor. The additional protection for bulls will also be beneficial during years when we are unable to estimate the bull ratio. The “antlered bull” bag limit would protect many older bulls that would have lost their antlers already, while providing some opportunity for younger bulls due to their longer antler retention.

The department does not expect this change to affect the total number of moose harvested. The better travel later in the season will make more moose available, while the antlered bull requirement will help

distribute the harvest. The board should consider if adoption of the proposal continues to provide a reasonable opportunity for subsistence uses of the Unit 17 moose population.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 50 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Phil Byrd

WHAT WOULD THE PROPOSAL DO? This proposal changes the location where nonresident hunters can obtain registration permits (RM587) for hunting moose in Unit 17. However, since the only nonresident registration permit hunt for moose is in Unit 17B the remainder of this analysis will be specific to Unit 17B. Presently the nonresident registration permits are only available in Dillingham during July 15–September 6. If adopted the permits would be available in Iliamna and Port Alsworth, as well as in the villages of Unit 17 (Togiak, Twin Hills, Manokotak, Dillingham, Aleknagik, Koliganek, New Stuyahok, Ekwok, Clarks Pt. and Ekok).

WHAT ARE THE CURRENT REGULATIONS?

- The fall moose season in Unit 17B for nonresident hunters runs from September 5–15.
- For the purposes of the nonresident moose hunt, this Subunit of Unit 17 is divided into two geographical areas:
 - “Unit 17B nonresident closed area”: this area extends 2 miles on either side of and including the Nushagak River, the Mulchatna River and several other smaller rivers that drain into these streams. For this area, hunters need to acquire a registration permit (RM587), which can only be obtained at the Dillingham Fish and Game office during July 15–September 6, and only 75 permits are available. The bag limit is for one bull, with 50-inch antlers or antlers with 4 or more brow tines on at least one side. Unless accompanied by a registered big game guide, the hunters are required to watch orientation videos on identifying a legal bull moose (“Is This Moose Legal”) and on field dressing and butchering a moose in the field (“Meat Care”). They are required to sign a nonresident orientation card signifying that they watched the required videos, and they are required to carry the card in the field with them. Also, each hunter is provided a map of the corridor where the permit is required and they are required to fill out a hunter orientation checklist that includes 11 questions to assure the hunter understands the legalities of their hunt and the process of selecting a legal moose and handling the meat.
 - The remainder of Unit 17B: for this area, nonresident hunters can hunt under a general season harvest ticket. Harvest tickets are available online, or at most Fish and Game offices and vendors in Alaska. The bag limit is for one bull with 50-inch antlers or antlers with 4 or more brown tines on at least one side.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would have to secure vendors within each of the communities the author lists in

the proposal. Although we have staff in Dillingham available to issue permits, we do not have offices in any of the other communities, and therefore would have to depend on vendors to meet this permit issuance need.

BACKGROUND: The registration permit requirement for this hunt was adopted by the board in 2005 and was meant to address crowded hunting conditions along portions of the Nushagak and Mulchatna rivers that were impacting local hunters, and their ability to secure moose and caribou. The limited number of permits was one aspect of the permit, but another was the requirement for orientation to assure nonresident hunters understood hunt regulations, the geographical area of their hunt, and the importance of meat care.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the proposed changes do not create a biological concern for the moose population. Rather, the requirement for nonresident hunters to get their permits in Dillingham is meant to assure all hunters understand the nuances of hunting under this permit hunt. The need for the registration permit and the requirements for orientation are an important part of this hunt management. If we were to consider a wider distribution of permit issuance, we would prefer to limit these to ADF&G offices where staff can be trained to address the specifics of this hunt; alternate locations might include the Anchorage and King Salmon offices. Finding interested parties to be vendors, and training and managing them is no small task, especially in this case where there are so many specific requirements associated with the permit, the orientation, and board direction that hunters understand the hunt and hunt area.

COST ANALYSIS: Adoption of this proposal would result in additional administrative costs to the department in personnel time and travel to villages to train permit vendors. These costs could amount to a significant amount of staff time and operating budget.

PROPOSAL 51 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Nushagak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal extends the season dates for the winter moose hunt in Units 17B and 17C, from December 1–31 to December 1–January 31. This would add 31 days to the season length and the department could then extend the moose season by emergency order if the in-season conditions warrant a season extension. The new season dates would be listed in the codified regulations, while the season dates on the permit and in the Alaska Hunting Regulations book would remain December 1–31.

WHAT ARE THE CURRENT REGULATIONS?

- The winter moose hunt in Units 17B and 17C runs from December 1–31.
- A registration permit (RM585) is required and can be obtained in person in Dillingham beginning October 23 and in Nushagak River villages.
- The bag limit is one antlered bull.

- Successful hunters are required to report their moose within 5 days of kill except if the moose is taken from the area south of Lake Aleknagik and west of the Wood River in which case hunters must report by phone or in person within 24 hours of kill.
- The Iowithla River drainage is closed to hunting as is the area within one half mile on either side of the Aleknagik Lake Road.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A critical aspect of this proposal is the recommendation by the authors that this season extension be adopted into regulation, but not be incorporated into the dates published on the RM585 permit nor those listed in the Alaska Hunting regulations. The season extension would then be available in situations where snow conditions or weather prevented hunters from harvesting many moose and the department believed additional harvest opportunity was warranted. The department would then use EO authority to extend the season to January 31 or some period of time that was deemed appropriate.

Although the authors of this proposal state explicitly their wish is to see this regulatory change used only under “special conditions” the quandary is in articulating what these conditions are and what criteria to use in deciding whether to extend the season. There is also reference to other stakeholders being involved in this decision making process which could create a complex decision making process. Department staff may be put in a no-win situation as there will always be hunters who want a longer season, and with an already adopted season extension in place, we would expect a steady stream of these requests.

BACKGROUND: The geographical area included in this winter hunt changed substantially in the past few years adding additional areas to hunt, especially for those areas near Dillingham. Previously Sunshine Valley and all portions of Unit 17C west of the Wood River and south of Aleknagik Lake were closed during this winter hunt; these areas are now open. This changes the hunt dramatically in that hunters no longer have to wait for the Wood River to freeze to access moose hunting areas. They can now use the Aleknagik Lake road as a main access route as well as winter trails that are passable by snowmobiles.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the proposed regulatory change. The department does not have the information it needs to support an extension of the winter season in Unit 17B and 17C and has not approved requests for emergency season extensions in the past due to the potential for biological concerns. The department already has emergency order authority to extend the moose season if conditions warrant, and the regulatory change will have no effect on how the moose hunt is managed.

While the reporting requirements of the permit hunt allow us to track harvest and make in-season management decisions if necessary, we do not have a harvest quota for bull moose in this area because we do not have reliable data on the proportion of bulls in this herd. We can only look at past harvest as a gauge of what we might expect the winter hunt to produce. Moose do not appear to be nearly as productive in Units 17B and C, as the population is in Unit 17A. The bull harvest in the fall hunt has been on a decreasing trend for the past 10 years and increasing the harvest pressure on bull moose may be detrimental to this population.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 52 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Aaron Bloomquist

WHAT WOULD THE PROPOSAL DO? This proposal changes the nonresident hunt in Unit 17A in two ways:

1. Extend the nonresident fall moose hunting season by 5 days, changing it from the present season dates of September 5–15 to September 5–20 and;
2. Change the nonresident closed area definition by eliminating several streams from this restriction.

It should be noted that the proposal refers to a “closed area”, but no areas are closed to hunting in Unit 17A. However, there is a restriction on using an aircraft for access in certain parts of the Unit. Nonresident hunters can hunt these areas providing they abide by the aircraft restriction.

WHAT ARE THE CURRENT REGULATIONS? Currently nonresident hunters can only participate in moose hunting in Unit 17A if they successfully apply for the DM570 drawing permit hunt.

- The season dates are September 5–15.
- The bag limit is one bull with 50-inch antlers or antlers with 4 or more brown tines on at least one side.
- Aircraft access is restricted for two miles on either side of Togiak River, Togiak Lake, Izavieknik River, Upper Togiak Lake (Second Lake), Ongivinuk River, and along the lower five miles of both Kuku (also known as Narogurum) and Nayonurun (also known as Nagugun or Kashalak) rivers. This stipulation is not in regulation, but is a permit hunt condition.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal were adopted, the 5 additional days added to the season would likely increase the success of the nonresident hunters.

The author would also like to see the aircraft restricted area changed to only include the Togiak River, Togiak Lakes, and the Izavieknik River that connects the upper and lower Togiak lakes.

BACKGROUND: The drawing permit hunt, DM570, was adopted by the board in 2013, with the first season being fall 2014. Twenty permits were offered through the draw process, and 13 hunters applied for and received permits. Neither the number of permits issued nor the aircraft restriction is in regulation. The department was directed by the board to take these actions through board findings at the 2013 board meeting (2013-201-BOG). More specifically, finding (1) associated with nonresident permits states “Issue 20 permits the first year for 17A nonresident moose drawing permit (the first year of the hunt will be the 2014/2015 regulatory year),” while finding (2) associated with aircraft restrictions states “Use discretionary authority to restrict aircraft access during the fall season from moose hunting in 17A in a 2 mile corridor along the rivers and lakes as identified in the Unit 17A Moose Management Plan recommendations.” These recommendations in the moose management plan are stated as: “Aircraft access will be restricted for the fall hunt for two miles either side of the Togiak River, Togiak Lake, Izavieknik River, Upper Togiak Lake (Second Lake), Ongivinuck River and along the lower five miles of

both the Kemuk (also known as Narogurum) and Naylorun (also known as Nagugun or Kashaik) Rivers.”

Moose are relative newcomers to much of Unit 17A, with only about 35 animals being present along the eastern border in 1980. Since then, moose have continued to immigrate from Unit 17C and increase. They have moved west across Unit 17A and into Unit 18. The most recent survey in 2011 estimated the Unit 17A population to be in excess of 1,600 moose.

Moose management in Unit 17A has been guided by the Unit 17A Moose Management Group, consisting of members from the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, the Togiak National Wildlife Refuge, and the Alaska Department of Fish and Game. This group produced a Unit 17A Moose Management Plan that went through several iterations during 1996–2013, with the 2013 plan being used as the guiding document today. This plan has goals and objectives for hunter opportunity, harvest allocation, habitat mapping and population monitoring.

The board reviewed the moose management plan during the 2013 Board of Game meeting in Wasilla and authorized a draw hunt for nonresident hunters, which was offered for the first time in the fall of 2014. The impetus behind the nonresident hunt was to take advantage of the opportunity provided by this growing moose population. The management plan contains guidelines that recommend nonresident opportunity when the moose population reaches a certain level. The river systems that are listed in the aircraft restricted area were identified during the planning process as being important for river access by Togiak hunters. After reviewing the recommendation, the board authorized the department to restrict aircraft access in accordance with the plan.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of providing resident and nonresident hunting opportunity and removing access restrictions. The hunt structure currently in place was adopted during the 2013 Board of Game meeting in Wasilla. Due to delays associated with implementing the new draw hunts relative to the board cycle, the department has only had one hunting season to evaluate the effects of the most recent liberalizations.

Bull moose begin to enter the rut in mid-September and with each passing day, they become less wary and more vulnerable to harvest. Although the resident fall moose season in Unit 17A extends through September 20, fall hunts in Units 17B and 17C close on September 15 because of the vulnerability of bulls past that date, and the declining quality of meat due to the rut. Increasing the length of the nonresident moose season does not present an immediate conservation concern, however, because the nonresident hunt has only occurred for one season (regulatory year 2014), and the implications of increasing the season length cannot be quantified at this time. The department anticipates that nonresident participation and success could increase as the hunt becomes more established. Additionally, because the liberalized resident opportunity (two moose bag limit and extended winter season) has only been in place for one hunting season (regulatory year 2013), the department does not recommend changes to this hunt structure until more information is obtained.

The aircraft restricted area was delineated through efforts of the Unit 17A Moose Management Group, which was composed of the Bristol Bay Federal Subsistence Regional Advisory Council, the Nushagak and Togiak Fish and Game Advisory Committees, the Togiak National Wildlife Refuge, and the Alaska

Department of Fish and Game. This restricted area was endorsed by the board as a finding at the 2013 board meeting.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 53 – 5 AAC 92.044. Permit for hunting bear with use of bait or scent lures, 5AAC 92.210. Game as animal food or bait, and 5AAC 85.020. Hunting seasons and bag limits for brown bear.

PROPOSED BY: Jason Mogen

WHAT WOULD THE PROPOSAL DO? This proposal makes three changes to brown bear hunting in Unit 17:

1. Allow the use of bait and lures for taking brown bears;
2. Allow moose carcasses from natural mortalities to be moved into locations that are more conducive to hunting bears, and;
3. Change the bag limit for brown bears from two to one per regulatory year.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

- It is not legal to use bait for the taking of brown bears in Unit 17.

5 AAC 92.210. Game as animal food or bait.

- It is not legal to move a carcass of an animal that died of natural causes to be used as bait for bear hunting.

5 AAC 85.020. Hunting seasons and bag limits for brown bear.

- Bag limit is 2 bears per regulatory year for resident and nonresident hunters;
- Season dates are August 20–May 31;
- There is no permit or harvest ticket required, except for the subsistence hunt for residents;
- There is no resident big game locking tag required.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal addresses the use of winter killed moose carcasses as bait and the relocation of these carcasses into strategic locations for bear hunting. If these two aspects of this proposal were adopted, they would give hunters who find winter killed moose carcasses a better chance to lure in a bear and position it in a location conducive to observing and harvesting a bear. Whether many other hunters would take advantage of this situation, other than the author, is unknown.

If a proposal to allow the moving of a winter killed moose carcass to use as bear bait were to pass, this would be the only Unit in the state where this is legal. This could raise concerns with poaching of moose to be used in this manner and likely is why this is not allowed anywhere in the state.

Reducing the bag limit for brown bears in Unit 17 from two to one, as it had been prior to 2011, would not affect the harvest significantly. In the past three years since the two bear bag limit was adopted approximately 8% of the bear hunters took two bears (30 out of 400 hunters), so it appears that most hunters are only interested in taking a single bear in any given year.

BACKGROUND: The department supported a proposal from the New Stuyahok Tribal Council in 2011 to increase the brown bear bag limit in Unit 17 from one to two bears per regulatory year. The resulting harvest went from 138 bears in 2010 while still at one bear per year bag limit, to 170 in 2011 under the two bear bag limit, then back down to 144 in 2012, and 116 bears in 2013. During the three years that the two bear bag limit has been in place, there have been a total of 430 brown bears harvested in Unit 17, with 30 hunters taking two bears. Most of the bears harvested during the spring season are taken in the hills near their den sites with the use of snowmachines, and bears harvested during the fall are often taken on salmon streams or on hillsides where the bears access berries. In either case, there are naturally occurring food sources that bears are utilizing that make baiting unnecessary in many cases. Based on these data, it appears most hunters are only interested in taking a single bear in any given year, and a return to the one bear per year bag limit would not significantly change the overall harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on returning to a one bear per year bag limit and on establishing a bear baiting season for brown bears in Unit 17, but is **OPPOSED** to allowing the relocation of winter killed moose carcasses for bait because it is a statewide regulation.

The bag limit of two bears per regulatory year has been in place for 3 years and has not resulted in a significant increase in brown bear harvests. As a result the current bag limit does not create a biological concern, and brown bear harvests can be sustained under either the current or proposed bag limit. Similarly, allowing brown bear baiting in Unit 17 is not expected to result in a significant increase in brown bear harvests, although the extent to which it may be utilized is unknown.

The regulatory change to allow winter killed moose carcasses to be moved to a new location for bear baiting would be in conflict with a statewide regulation that makes this illegal. If the board wishes to allow carcasses to be moved the department recommends it be done on a statewide basis.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 54 –5 AAC 92.220. Salvage of game meat, furs, and hides.

PROPOSED BY: Nushagak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal allows hunters who are residents of Alaska to sell the hides with claws and/or skulls of legally taken brown bears harvested in Unit 17.

WHAT ARE THE CURRENT REGULATIONS? This proposal addresses two statewide regulations that include Unit 17.

5 AAC 92.200. Purchase and sale of game.

- It is illegal to sell any part of a brown/grizzly bear except:
 - an article of handicraft made from the fur of the bear;

5 AAC 92.116. Special provisions in predator control areas.

- the skulls and hides with claws attached of brown bears taken in a brown bear control area may be sold by permit from the department.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow the sale of these parts from brown bears taken in Unit 17.

Allowing the sale of brown bears would create more of an incentive for people to harvest bears, but it would be in conflict to what is allowed throughout the remainder of the state. There could be concerns with “bootlegging” of bears from adjacent units or anywhere in the state, and tracking these bears could require an extensive administrative workload.

BACKGROUND: Currently it is illegal to sell any part of a brown/grizzly bear except the fur of a bear that is made into an article of handicraft and bear hides that have been taken in brown bear control areas, which can be sold by permit from the department. Other than these two exceptions, any other commercial use of brown bear parts is prohibited under State of Alaska regulations.

The department supports the sale of brown/grizzly bear hides taken in Intensive Management (IM) programs as a tool to meet the brown bear removal goals. The sale of brown/grizzly bears is subject to regulations under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and requires various state and/or federal permits to leave Alaska.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because it would occur in an area that does not have an IM program to reduce brown bear predation and because the prohibition on sale of claws and hides is a statewide regulation. Enforcement of regulations governing the sale of bear parts is problematic and may increase the incentive to take bears in adjacent areas, such as Unit 9. The department does not have the ability to track bears harvested in Unit 17 and adjacent units to assure bears are not being illegally sold from other areas.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 55 – 5 AAC 84.270. Furbearer trapping; and 92.095(3). Unlawful methods of taking furbearers; exceptions.

PROPOSED BY: Nushagak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal liberalizes trapping regulations that govern the taking of beaver with firearms in Unit 17 by lengthening time period in which firearm use is allowed, removing the bag limit restriction and modifying the salvage requirements. It would also allow trappers to

harvest beaver with a bow and arrow with the same proposed restrictions. Under the proposed trapping regulations the use of firearms or bow and arrow to take beaver would be allowed from October 10–May 31 with no bag limit. There would be no requirement to salvage meat for human consumption. However, salvage of either the hide or the meat would be required.

WHAT ARE THE CURRENT REGULATIONS?

Trapping season in Units 9 and 17 is from Oct. 10 – May 31 with no limit. Firearms may be used to take up to 2 beaver per day from April 15 – May 31, if the meat is salvaged for human consumption, and in Units 12, 19, 20A, C, E, F, 21, 24 and 25 a firearm or bow and arrow may be used to take beaver.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal provides trappers with the option to use firearms or bow and arrow to harvest beavers throughout the entire season.

BACKGROUND: The beaver season in Unit 17 has changed substantially over the past 20 years.

- 1991—1996: the bag limit in Unit 17 was 20 beavers during a January 1—31 season in Unit 17A and January 1—February 28 in Units 17B and 17C.
- 1997: the season length was increased to November 10–February 28 and the seasonal bag limit was increased to 40 beavers. Additionally, a spring season was initiated that ran from April 15—May 31 with a daily bag limit of 2 beavers by firearm; however, the meat needed to be salvaged for human consumption. This spring firearm season and the condition requiring the salvage of meat is still in place today.
- 1999: the season was extended from February 28–March 31.
- 2003: the season was again extended to October 10–March 31, and the seasonal bag limit was removed.
- 2010: the season was extended again to October 10–May 31.

Reasons for the continued lengthening and liberalization of the beaver season stemmed from an apparent abundance of beaver combined with a decrease in the number of beaver trappers. As a result, there have not been any unit-wide conservation concerns with the steady liberalization of beaver trapping and harvesting opportunity; however, Proposal 57 suggests there may be a localized depletion of beavers in some areas.

Although the proposed changes seem like a large increase in harvest opportunity, the reality is that travel and access to beaver habitats can be difficult during the late fall and in late spring because trappers need to shift from boats to snowmobiles and then from snowmobiles to boats. These transition seasons limit participation in beaver trapping. Additionally, during the winter, most beaver activity occurs under the ice, which prevents trappers from harvesting them by any means other than with traps. Without the requirement to salvage the carcass for human consumption, harvesting beavers by firearm or bow and arrow may become more attractive to some users. However, as the harvest history suggests, the take of beavers with firearms will likely remain fairly minimal.

Presently the department does not have any conservation concerns with beavers in Unit 17. The amount of trapping effort is just a fraction of what it was 20 years ago, and the drastically lower harvest is likely a reflection of that decline in effort. Observations during aerial surveys of beaver sign and activity as well as discussions with moose hunters, trappers, and department fisheries staff indicate that beavers are widely spread and abundant throughout most of the unit.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the liberalization of opportunity to harvest beaver with a firearm or bow and arrow, but is **OPPOSED** to waiving the sealing requirement which is required statewide. We request that the board amend the proposal to retain the sealing requirement. In 2003, the department opposed an increase in the bag limit during the spring firearm season that would have increased the daily bag limit from 2 to 4 beaver per day. Reasons cited were that it might cause local depletion of beavers near communities. However, since the inception of the firearm season for beavers in 1997, less than 2% of the beavers taken have been harvested by firearm. Consequently we do not believe the changes suggested by this proposal would have much of an influence on the beaver harvest or beaver population.

Given the abundance of beaver across the unit and the low amount of effort from trappers, we do not believe this proposal represents any conservation concern. The proponents do require the salvage of either the hide or meat of beavers harvested by firearm, which we believe is an essential part of this proposal.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 56 – 5 AAC 84.270. Furbearer trapping; and 92.095(3). Unlawful methods of taking furbearers; exceptions.

PROPOSED BY: Todd Fritze

WHAT WOULD THE PROPOSAL DO? This proposal removes the bag limit restrictions and modifies the salvage requirements for harvesting beaver with a firearm during the trapping season in Unit 17. It would allow the use of firearms for beaver trapping October 10–May 31 with no bag limit. There would also be no requirement to salvage meat for human consumption.

WHAT ARE THE CURRENT REGULATIONS?

Trapping season in Units 9 and 17 is from Oct. 10 – May 31 with no limit. Firearms may be used to take up to 2 beaver per day from April 15 – May 31, if the meat is salvaged for human consumption, and in Units 12, 19, 20A, C, E, F, 21, 24 and 25 a firearm or bow and arrow may be used to take beaver.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal provides trappers with the option to use firearms to harvest beavers throughout the entire season. Although this seems like a large increase in harvest opportunity, the reality is that travel and access to beaver habitats can be difficult during the late fall and in late spring because trappers need to shift from boats to snowmobiles and then from snowmobiles to boats. These transition seasons limit participation in beaver trapping. Additionally, during the winter, most beaver activity occurs under the ice, which

prevents trappers from harvesting them by any means other than with traps. Without the requirement to salvage the carcass for human consumption, harvesting beavers by firearm may become more attractive to some users. However, as the harvest history suggests, the take of beavers with firearms will likely remain fairly minimal.

BACKGROUND: The beaver season in Unit 17 has changed substantially over the past 20 years.

- 1991—1996: the bag limit in Unit 17 was 20 beavers during a January 1—31 season in Unit 17A and January 1—February 28 in Units 17B and 17C.
- 1997: the season length was increased to November 10—February 28 and the seasonal bag limit was increased to 40 beavers. Additionally, a spring season was initiated that ran from April 15—May 31 with a daily bag limit of 2 beavers by firearm; however, the meat needed to be salvaged for human consumption. This spring firearm season and the condition requiring the salvage of meat is still in place today.
- 1999: the season was extended from February 28—March 31.
- 2003: the season was again extended to October 10—March 31, and the seasonal bag limit was removed.
- 2010: the season was extended again to October 10—May 31.

Reasons for the continued lengthening and liberalization of the beaver season stemmed from an apparent abundance of beaver combined with a decrease in the number of beaver trappers. As a result, there have not been any unit-wide conservation concerns with the steady liberalization of beaver trapping and harvesting opportunity; however, Proposal 57 suggests there may be a localized depletion of beavers in some areas.

Presently the department does not have any conservation concerns with beavers in Unit 17. The amount of trapping effort is just a fraction of what it was 20 years ago, and the drastically lower harvest is likely a reflection of that decline in effort. Observations during aerial surveys of beaver sign and activity as well as discussions with moose hunters, trappers, and department fisheries staff indicate that beavers are widely spread and abundant throughout most of the unit.

DEPARTMENT COMMENTS: The department recommendation on this proposal is **TAKE NO ACTION** based on actions taken on Proposal 55 (see Proposal 55 for the department's comments and recommendation).

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 57 – 5 AAC 84.270. Furbearer trapping; and 92.095(3). Unlawful methods of taking furbearers; exceptions.

PROPOSED BY: Chris Carr

WHAT WOULD THE PROPOSAL DO? This proposal prohibits the take of beaver with a firearm in Unit 17 and shortens the trapping season dates by moving the opening date from November 10 to October

10 and moving the closing date from March 31 to May 31. An annual bag limit of 40 beavers would also be instituted.

WHAT ARE THE CURRENT REGULATIONS?

5 AAC 84.270. Furbearer trapping.

Species and Units	Open Season	Bag Limit
(1) Beaver ----		
Units 9 and 17; firearms may be used to take up to 2 beaver per day from Apr.15-May 31 ----	Oct. 10–May 31	No limit

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

-
- (3) taking beaver by any means other than a steel trap or snare, except that a firearm may be used to take two beaver per day in Units 9 and 17 from April 15 through May 31 if the meat is salvaged for human consumption;
-

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal was adopted trappers would no longer have the opportunity to harvest beaver with a firearm, and the trapping season would be shortened by 3 months.

Overall harvest of beavers would likely drop due to the removal of the October and April-May portions of the season. October is an especially attractive period for trappers, and since 2003, when the October season was adopted, 14–63% of the annual harvest in Unit 17 has been taken during the month of October.

BACKGROUND: The later start to the season would affect a trapper's ability to take beaver in the early season, which is very attractive since it is prior to freeze up, which allows trappers to access areas by boat and make water sets or even dry land sets. The author's suggested opening date of November 10 is generally at a period of the year where boats are no longer usable for transportation, but acknowledges that conditions are not normally conducive to snowmachine travel. This would limit a trapper's ability to access beaver trapping areas until freeze up, which generally does not occur until December or later.

The beaver season in Unit 17 has changed substantially over the past 20 years with a trend toward more liberalized trapping seasons.

- 1991—1996: the bag limit in Unit 17 was 20 beavers during a January 1—31 season in Unit 17A and January 1—February 28 in Units 17B and 17C.
- 1997: the season length was increased to November 10—February 28 and the seasonal bag limit was increased to 40 beavers. Additionally, a spring season was initiated that ran from April 15—May 31 with a daily bag limit of 2 beavers by firearm; however, the meat needed to be salvaged for human consumption. This spring firearm season and the condition requiring the salvage of meat is still in place today.
- 1999: the season was extended from February 28—March 31.
- 2003: the season was again extended to October 10—March 31, and the seasonal bag limit was removed.
- 2010: the season was extended again to October 10—May 31.

Reasons for the continued lengthening and liberalization of the beaver season stemmed from an apparent abundance of beaver combined with a decrease in the number of beaver trappers. As a result, there have not been any unit-wide conservation concerns with the steady liberalization of beaver trapping and harvesting opportunity.

Presently the department does not have any conservation concerns with beavers in Unit 17. The amount of trapping effort is just a fraction of what it was 20 years ago, and the drastically lower harvest is likely a reflection of that decline in effort. Observations during aerial surveys of beaver sign and activity as well as discussions with moose hunters, trappers, and department fisheries staff indicate that beavers are widely spread and abundant throughout most of the unit.

DEPARTMENT COMMENTS: The department is **NEUTRAL** this proposal because the proposed regulation would not create a biological concern for beaver. Beaver are abundant throughout most of Unit 17. While some areas with good access may experience a localized depletion, there are ample surrounding refugia that can act as a source population for beavers in these areas. With the decline in beaver trappers and harvest in Unit 17, the proposed restrictions do not appear to be biologically necessary.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 58 – 5 AAC 92.110. Control of predation by wolves.

PROPOSED BY: Paxson Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal increases the wolf population size that triggers the suspension of the Intensive Management (IM) program “closer to the midpoint” of the range in the wolf population size objective (135–165 wolves), rather than at the current population minimum of 135. The wolf population assessment should also be limited to the current IM area.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.121 (b)(2)(C) establishes a spring wolf population objective of 135–165 wolves for Unit 13, including wolves in Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal sets the trigger for suspending the IM program at approximately 150 wolves in Units 13A, 13B, 13C, and 13E

and removes wolves found in Unit 13D from the assessment area. This change increases the number of wolves allowed to remain in Unit 13, while the IM program is suspended. These changes are expected to increase wolf predation on moose, but the implications for the moose population cannot be fully quantified at this time.

BACKGROUND: The spring wolf objective of 150 wolves was used as the objective for the wolf population in Unit 13 throughout the 1980s. The current IM program was implemented in January, 2004, at a time when the department estimated that there were 180–300 wolves in Unit 13. The wolf control area includes Units 13A, 13B, 13C, and 13E, and the wolf assessment area includes all of Unit 13. Unit 13D is included in the wolf assessment area because Unit 13D provides a refugia for wolves, which helps ensure the sustainability of the wolf population.

Since the program was initiated, the moose population in Unit 13 has grown from 13,000 moose in 2005 to 17,000 in 2013 (Table).

Table. Moose population and objectives in Unit 13, regulatory years 2008 through 2013.

Subunit	13A	13B	13C	13D	13E	Total
Objective	3500– 4200	5300– 6300	2000– 3000	1200– 1900	5000– 6000	17600–21900
2008	2,500	4,450	1,570	1,940	5,160	15,620
2009	3,530	4,630	1,610	1,900	4,940	16,610
2010	3,490	5,280	1,700	2,280	5,430	18,180
2011	3,890	5,340	1,950	1,950	5,780	18,910
2012	3,650	5,350	1,680	1,950	5,570	18,200
2013	4,000	4,930	1,770	1,500	4,950	17,150

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the proposal does not create biological concerns for the wolf populations in Unit 13, which can be sustainably managed under the current or the proposed objectives. However, increasing the wolf population size in Unit 13A, 13B, 13C, and 13E by removing Unit 13D from the wolf assessment area may make it more difficult to reach the moose population objectives in these units.

The department continues to be concerned about the lack of support for cow moose hunting in Unit 13 from some of the Unit 13 Advisory Committees. The cow moose hunts are needed to regulate the moose population within the established objectives and allow the moose harvest objective to be reached at a population size that is sustainable for moose. If cow moose hunting opportunity cannot be expanded beyond what is currently provided, regulation of the wolf population should be suspended in portions of Unit 13 to keep the moose population from exceeding the population size objectives.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 59 – 5 AAC 92.108. Identified big game prey populations and objectives.

PROPOSED BY: Paxson Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal lowers the 13B moose population objective of 5,300-6,300 to 4,000–5,000, and lower the 13B moose harvest objective from 310–620 to 240–280.

WHAT ARE THE CURRENT REGULATIONS? The current Intensive Management (IM) moose population objective for Unit 13B is 5,300–6,300 and the harvest objective is 310–620.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal lowers the management objectives for moose in Unit 13B. Under the proposed objectives, the moose population would be within the objectives for population size but would still be below objectives for harvest. The harvest objective could be reached with limited cow hunting opportunity. The new harvest objectives recommend a harvest of 4.8–7.0% of the moose population when it is in the proposed population objective range.

BACKGROUND: While the subunit 13B moose population has been increasing over the past decade, there are no indications that the population is unsustainably high. In spring 2012, 15 female moose calves (10-month of age) were captured and weighed, 11 of which were fitted with radio collars. An additional 18 adult cow moose were also captured and fitted with radio collars. Based on pregnancy testing results, 15 of 18 adult cows were pregnant (83%).

The IM population objective range of 5,300–6,300 moose for subunit 13B was originally set in the early 1990s. For the entire subunit, this equates to a density of 1.4–1.6 moose per mi² (for area < 4000ft elevation, the range would be 1.9–2.3 moose per mi²). Survey methods and population estimation techniques have been consistent through time. Two large trend count areas covering 1,505mi² (55% of available moose habitat in the subunit) are flown annually (post-hunting season). Count data are extrapolated to the remainder of the subunit, and a 10% sightability correction factor is applied. In 2013, the subunit population estimate was 4,930 moose (1.8 moose per mi²). The survey composition was 39 bulls:100 cows and 29 calves:100 cows, and the estimated total number of cows, bulls, and calves in the subunit were 2,940, 1,150, and 850. While fall calf ratios are moderate in subunit 13B, and below the objective of 30 calves per 100 cows, fall calf ratios alone are not an indication of herd productivity. These ratios represent a combination of how many calves were born and how many survived to fall.

The harvest objective range of 310–620 for subunit 13B was based on projected potential harvest rates of 6–10%. The original intention was to harvest bulls and cows when the population was high. While short of objectives, the annual bull moose harvest has increased significantly in recent years, increasing from 125 in regulatory year 2001 to 304 in 2010. Harvest declined to 201 in 2013, in part due to changes in hunting opportunities. With an estimated 3,300 cows in the subunit, a limited opportunity also exists to harvest cow moose at this time. A small cow harvest would increase the overall harvest to within IM objective range, and would help stabilize this population.

Table 1. Moose population and objectives in Unit 13B, regulatory years 2008 through 2013.

	Population Objective 5300–6300	Harvest Objective 310–620
2008	4,450	188
2009	4,630	243
2010	5,280	304
2011	5,340	267
2012	5,350	202

2013	4,930	201
------	-------	-----

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the proposed changes to the IM objectives do not create a biological concern for the moose population. The harvest objectives represent a harvest that is sustainable at the recommended population objectives. The interest in changing the objectives is based on social values for the moose population and for the conditions people experience during the hunting season, such as hunter crowding and competition. As such, the department does not have a recommendation for this proposal.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 60 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose hunts in Unit 13.

WHAT ARE THE CURRENT REGULATIONS? The department is authorized to issue up to 200 drawing permits for antlerless moose hunts in Unit 13 for an October 1–31 and March 1–31 season. Hunters are prohibited from taking of a calf and cows accompanied by a calf.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes the antlerless moose hunts in Unit 13 and will allow the department to issue 10 antlerless moose permits for the Unit 13A hunt areas during the regulatory year 2015 season.

BACKGROUND: The Unit 13 antlerless hunt was established in March 2011, and the first Unit 13 antlerless hunt under this regulation took place in September 2012. Ten permits have been issued annually for a single hunt area in the western portion of Unit 13A. This hunt resulted in the harvest of 4 cow moose during the 2012 season and 2 during the 2013 season.

During the 2013 Board of Game meeting in Wasilla, the board adopted a proposal that changed the hunt from September 1–20 to October 1–31 and March 1–31. These new season dates were implemented in the fall of 2014, so there is no data to evaluate how the season change will affect participation in the hunt. As of December 1, 2014, the preliminary harvest from the October 2014 season was 1 cow moose.

The proposal adopted during the 2013 meeting also included guidelines for the hunt. The guidelines instructed the department to issue antlerless moose permits when the moose population was at or above the midpoint of the population objective with the goal of harvesting up to 1% of the cow moose population.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. Antlerless moose hunts must be re-authorized annually by the board to comply with statutory requirements. These hunts are required to regulate the moose population within the established Intensive Management (IM) objectives for population size and harvest.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 61 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Clint Mayeur

WHAT WOULD THE PROPOSAL DO? This proposal converts the Unit 13 nonresident moose hunts from drawing permit hunts to registration permit hunts.

WHAT ARE THE CURRENT REGULATIONS? The department can currently issue up to 150 nonresident drawing permits (DM335–DM339). Permitted hunters are allowed to harvest 1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side during the September 1–20 season.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would allow an unlimited number of nonresidents to register for the Unit 13 moose hunt. It is anticipated that the number of nonresident hunters and moose harvest would increase.

BACKGROUND: Nonresident hunters were allowed to participate in the general season hunt from regulatory years 1993–2001. An average of 193 (range = 115–247) nonresidents reported hunting each year, nonresidents annually harvested an average of 76 bulls (9% of the total harvest), with an average success rate of 39%.

Nonresident moose hunting seasons were closed between 2002 and 2008. During that period, the total Unit 13 harvest increased from 574 to 735 moose. Starting in 2009, five nonresident drawing hunts have been offered, one for each subunit. Between 2009 and 2013, an average of 87 (range = 50–115) nonresident permits have been issued annually. An average of 49 nonresident permittees reported hunting annually, and an average of 14 were successful each year (30% success rate). The 2013 unit-wide harvest was 670 moose. Nonresident hunters comprised 1% of the moose hunters and harvested 3% of the moose taken.

Table 61-1. Unit 13 nonresident moose drawing permit hunts, DM335-DM339, regulatory years 2009 through 2013.

Year	DM335-DM339		
	Permits	Hunted	Harvest
2009	50	33	12
2010	110	60	13
2011	65	35	16
2012	105	57	9
2013	105	60	18

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal due to the allocative nature of the proposed changes. Converting the hunt structure to a registration hunt is expected to increase nonresident participation in the Unit 13 moose hunt and harvest. Because the Unit 13 moose populations

are close to the management objectives for the bull:cow ratio, the department does not recommend changes that would increase moose harvest in easily accessible areas.

If the number of registration permits is capped, there may be unintended implications for nonresident hunters who travel to Alaska and cannot obtain a permit. The department will need direction language from the board as to where and when these registration permits would be made available to the public.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 62 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: Claude Bondy

WHAT WOULD THE PROPOSAL DO? This proposal would create a drawing hunt for nonresidents in Unit 13 for the Nelchina caribou herd. The proposal suggests a limit of 100 or “whatever management number works best”.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three permit hunt structures. There is currently no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Tier I Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I Community Subsistence Harvest permits that may be issued annually.
- There are four drawing permit hunts for caribou in Unit 13 (DC480–DC483). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of 1 caribou.
- The Amount Necessary for Subsistence (ANS) for the Nelchina caribou herd is 600–1,000 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal allocates caribou hunting opportunity to nonresidents by establishing a drawing hunt in Unit 13.

BACKGROUND: The board has made a positive customary and traditional use finding for the Nelchina caribou herd in Units 12 and 13, and has found that 600–1,000 Nelchina caribou are reasonably necessary for subsistence.

When the Nelchina harvestable surplus is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The “Tier I Plus” hunt structure is composed of resident-only hunts, which

includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,600 Nelchina caribou have been harvested annually by resident hunters since 2009. Nonresident hunting opportunity has not been offered since 1981.

The Nelchina herd's population estimate was 40,500 caribou in 2013. Composition surveys conducted during October 2014 observed ratios of 42 bulls:100 cows and 45 calves:100 cows. The Nelchina harvest quota was 3,000 caribou (1,300 cows and 1,700 bulls) in 2014. As of December 1, 2014, 1,000 cows and 1,500 bulls have been reported in the harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou hunting opportunity between resident and nonresident hunters in Unit 13. The harvestable surplus of the Nelchina herd is currently above the upper limit of the amount reasonably necessary for subsistence (1,000 caribou). If this proposal is adopted the department will need direction from the board on the number of drawing permits issued to nonresidents as harvest quotas change over time.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 63 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: David Luke

WHAT WOULD THE PROPOSAL DO? This proposal limits resident caribou hunters to two Nelchina caribou drawing permits (DC480–DC483) per household.

WHAT ARE THE CURRENT REGULATIONS? The current regulations allow one drawing permit per individual. Successful applicants are allowed to harvest one caribou, but cannot apply or receive the same drawing permit the following year.

- The board has made a positive customary and traditional use finding for the Nelchina caribou herd in Units 12 and 13, and has found that 600–1,000 Nelchina caribou are reasonably necessary for subsistence.
- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Tier I Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I CSH permits that may be issued annually.
- There are four drawing permit hunts for caribou in Unit 13 (DC480–DC483). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of 1 caribou.

- There is currently no nonresident hunting season for Nelchina caribou in Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would administer the Nelchina caribou drawing permit hunts in a manner that allows a maximum of 2 permits to be awarded per household. This change in allocation is not expected to result in a significant change to harvest.

BACKGROUND: When the Nelchina harvestable surplus is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The “Tier I Plus” hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and drawing permit hunts.

An average of 2,600 Nelchina caribou have been harvested annually by resident hunters since 2009. Nonresident hunting opportunity has not been offered since 1981. The number of Tier I permits issued has increased yearly since 2009. Over the last three regulatory years there has been an average of 5,840 RC566 Tier 1 caribou permits issued annually. Issued Tier I permits increased from 500 in 2009 to 5,045 in 2012. In 2013, 6,878 Tier I permits were issued, resulting in the harvest of 1,573 caribou (Table 63-1).

Table 63-1. Unit 13 Number of Nelchina caribou drawing hunt permits issued annually and resulting harvest, regulatory years 2011 through 2013.

Year	Permits	1/household	2/household	3/household	4/household	5/household	6/household
2011	1,127	985	65	4	0	0	0
2012	3,000	2,124	335	46	12	4	0
2013	5,008	3,331	617	94	35	3	1
2014	1,000	877	60	1	0	0	0

The estimated population size for the Nelchina caribou herd was 40,500 caribou in 2013. Composition surveys conducted during October 2014 observed ratios of 42 bulls:100 cows and 45 calves:100 cows. The Nelchina harvest quota was 3,000 caribou (1,300 cows and 1,700 bulls) in 2014. As of December 1, 2014, 1,000 cows and 1,500 bulls had been reported in the harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal due to the allocative nature of the proposed changes. No other drawing permits are governed by administrative rules that are based on the definition of “households”. The department will need to develop new programming to issue Nelchina drawing permits for a household-based hunt structure. Additionally, administration of the new allocation is expected to present difficulties defining and regulating “households”, which change over time.

COST ANALYSIS: Adoption of this proposal is expected to result in significant additional costs to the department to create software to track households.

PROPOSAL 64 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: George Esslinger

WHAT WOULD THE PROPOSAL DO? This proposal creates a split fall season for the Nelchina caribou Tier I registration hunt (RC566). Hunters would register for an August 10–31 or a September 1–20 season at the time of application. The harvest quota for the herd would be divided equally between the early-fall (August 10–31) and late-fall seasons (September 1–20). If the cumulative harvest quota is not reached in the fall, all RC566 permit holders would be allowed to participate in a winter season (October 21–March 31).

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.052 (12) gives the department the discretionary authority to specify time periods when a permit is valid during a permit hunt.

Resident hunters are allowed to participate in the Nelchina caribou hunt by applying to one of three permit hunt structures.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Tier I Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I CSH permits that may be issued annually.
- There are four drawing permit hunts for caribou in Unit 13 (DC480–DC483). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of 1 caribou.
- There is currently no nonresident hunting season for Nelchina caribou in Unit 13.

The board has made a positive customary and traditional use finding for the Nelchina caribou herd in Units 12 and 13, and has found that 600–1,000 Nelchina caribou are reasonably necessary for subsistence.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? RC566 applicants would apply for either an early or late season fall hunt and the harvest quota would be divided equally between the two fall seasons. If the harvest quota for the early or late fall season is reached, the department would close the season for that portion of the RC566 hunt. The CSH and drawing hunters awarded CC001 and DC480–483 permits would not be affected by the split-season quota. Limiting the ability of registration permit hunters to participate in the fall hunts may make it difficult to reach the herd's total harvest quota, particularly during years with large harvest quotas.

BACKGROUND: Management of the Nelchina herd depends on our ability to achieve the majority of the harvest quota in the fall when the majority of Nelchina caribou are in Unit 13. Often, very little harvest occurs during the winter season because the majority of Nelchina caribou typically migrate out of the unit during October. The number of caribou harvested each year and harvest chronology are largely dependent on caribou distribution and hunter access to the herd.

Since 2009, an average of 44% of the RC566 caribou harvest occurred from August 1–31 and 47% of the harvest occurred from September 1–20. During years when the winter season was open, hunters took an average of 10% of the annual RC566 caribou harvest.

Table 64.1. Nelchina caribou Tier I registration hunt (RC566) harvest chronology, regulatory years 2009 through 2013

	Number of Permits Issued	August 10–31	September 1–20	October 21– March 31
2009	500	88 (32%)	131 (48%)	56 (20%)
2010 ¹	1,151	266 (44%)	344 (56%)	-
2011	3,148	750 (47%)	718 (45%)	142 (9%)
2012	5,045	946 (37%)	1,099 (43%)	482 (19%)
2013 ²	6,878	921 (59%)	647 (41%)	-

¹Only Tier II TC566 permit holders participated in the winter hunt.

²No winter hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou hunting opportunity for the Nelchina herd between hunters participating in Unit 13 caribou hunts; however, the department is **OPPOSED** to dividing a harvest quota between the proposed early and late fall seasons. Adoption of this proposal is expected to limit the department's ability to manage the caribou herd within objectives by restricting harvests, particularly in years with large harvest quotas.

Additionally, the department does not have a separate quota for Tier I registration hunters. The department would need direction from the board on whether the split season quotas would be calculated based on the total harvest quota for the herd or some portion of the total harvest quota.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 65 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal recommends bringing the community subsistence harvest (CSH) moose season and general season into closer alignment, but recommends that there continue to be a longer CSH season. The proposal does not state how much additional opportunity should be provided during the CSH moose hunt.

WHAT ARE THE CURRENT REGULATIONS?

- The board has made a positive customary and traditional use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive customary and traditional use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive customary and traditional use finding for moose in Unit 13, and found that 300–600 moose are reasonably necessary for subsistence in that unit.

- The Copper Basin community subsistence harvest hunt area includes all of Unit 11, Unit 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest 1 bull from August 10–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet general season antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines (Unit 11) 4 or more brow tines on one side (Units 13 and a portion of Unit 12). Each CSH group has a bag limit of 1 bull moose that does not meet general season antler restrictions for every 3 households.
- Resident hunters with general season harvest tickets may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side from September 1–20. Hunters who register for a RM319 permit may harvest 1 bull from December 1–31.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal recommends reducing the length of the fall CSH season by adopting a later opening date, but does not recommend what the new date should be.

BACKGROUND: In 2011-184-BOG, the board recognized a range of subsistence uses within the use patterns for GMU 13 moose and caribou. The board noted that there are two basic use patterns: 1) a pattern for individuals, families, and other social groups (both within and outside the local area); and 2) “the community-based pattern established by the Ahtna.” The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

The board then created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a “community.” The other options include the general harvest ticket moose hunt (with antler restrictions) and the winter registration “any” bull moose hunt.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 65-1). In 2009 there was 1 CSH moose group with 378 participants. By 2013 there were 45 groups with 2,066 participants. Participation declined slightly in 2014 to 43 groups with 1,771 participants.

Since 2009, CSH hunters have harvested an average of 114 moose annually, including an average of 75 bulls that do not meet general season antler restriction (“any bull”). General season hunters harvested an average of 610 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season when the any-bull hunting opportunity is available (Figure 65-1).

Bull:cow ratios are close to management objectives near easily accessible areas. Current harvests have been decreasing in recent years, though harvest does not appear to be having an adverse effect on bull:cow ratios. The exception to this may be in 13A where the bull ratio observed was 24 bulls:100 cows

in 2013; however, the bull:cow ratio in Unit 13A is expected to improve with changes in hunt management and administration.

Table 65-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2014.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested
2009	1	19	246	378	100 (70 any bulls)
2010 ¹	-	-	-	-	-
2011	9	31	416	814	91 (64 any bulls) ²
2012	19	29	460	969	101 (76 any bulls) ²
2013	45	41	955	2,066	162 (88 any bull) ²
2014	43	41	893	1,771	148 (76 any bull) ²

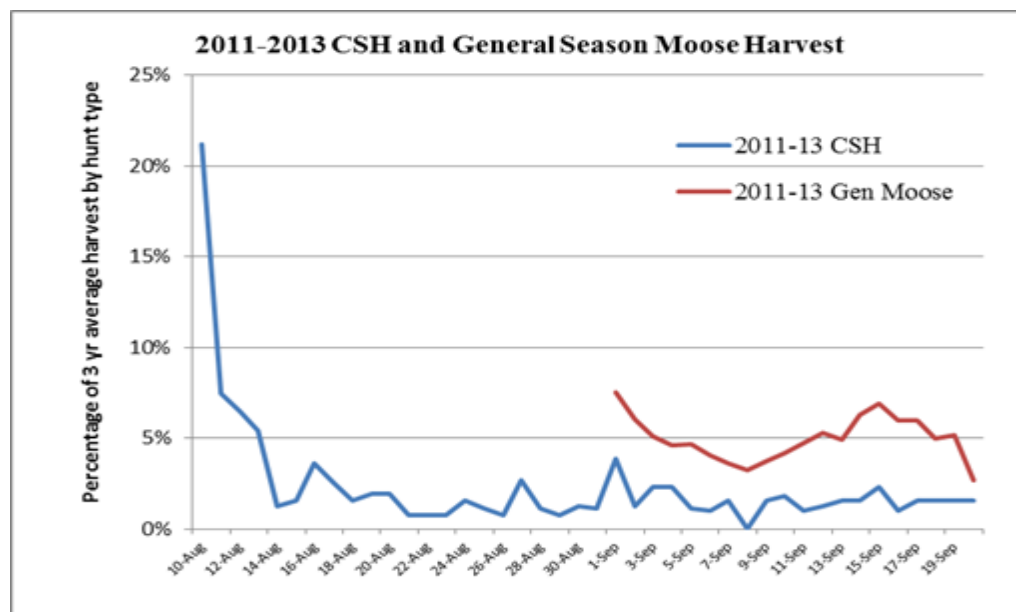
¹ The community hunt was not offered in regulatory year 2010.

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 65-2. Unit 13 moose population objectives and 2013 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500-4,200	5,300-6,300	2,000-3,000	5,000-6,000
2013 abundance estimate	4,000	4,930	1,765	4,950
Bull:cow Objective	25:100	25:100	25:100	25:100
2013 estimate	24	39	57	30

Figure 65-1. Chronology of moose harvest during the fall moose hunting seasons, regulatory years 2011 through 2013.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity to CSH moose hunters. Effort in the CSH moose hunt appears to be related to the any-bull bag limit. Based on the observed patterns in harvest chronology, CSH hunting effort is closely associated with time periods when the bag limit was any-bull in easily accessible areas. Delaying the season opening is not expected to reduce participation or harvest significantly.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 6 to 5 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 66 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would require Copper Basin CSH participants to participate in the CSH hunt for two or more years.

WHAT ARE THE CURRENT REGULATIONS? Currently, CSH hunters are only required to participate in the program for one regulatory year.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All Copper Basin CSH applicants and their household members would be required to participate in the CSH hunt and abide by the restrictions associated with the hunt for a period of two or more years. These restrictions include:

For Moose:

- No member of the household may apply for any drawing/Tier I/Tier II/registration moose hunts, or hold general season moose harvest tickets, or hold federal moose permits outside of the CSH hunt area (Units 11 and 13, and a portion of Unit 12). CSH moose hunters can apply for caribou drawing permits in Unit 13 only.
- No member of the household can apply for or hold state or federal drawing/Tier II/registration caribou permits outside the CSH hunt area during the CSH season.

For Caribou:

- No member of the household may apply for any drawing/Tier I/Tier II/registration caribou hunts, or hold general season caribou harvest tickets, or hold federal caribou permits outside of the CSH hunt area. CSH caribou hunters can apply for the moose drawing hunt in Unit 13 only.
- No member of the household can hunt moose outside of the CSH hunt area during the CSH season.

BACKGROUND: In 2011-184-BOG, the board recognized a range of subsistence uses within the use patterns for GMU 13 moose and caribou. The board noted that there are two basic use patterns: 1) a

pattern for individuals, families, and other social groups (both within and outside the local area); and 2) “the community-based pattern established by the Ahtna.” The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

The board then created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a “community.” The other options include the general harvest ticket moose hunt (with antler restrictions) and the winter registration “any” bull moose hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on decisions related to qualifications and conditions for subsistence hunts. The department anticipates many challenges in administering this restriction and would need direction on how to implement the new requirement if it is adopted, including:

- Would the requirement apply to all participants or just the head of the household, who submitted the application?
- If a participant changes households, do the restrictions apply to the new household or just the individual?
- Are there any conditions under which a person could appeal the restriction? Examples: A person who changes location of residence and is no longer able to access the hunt area without undue hardship; changes in relationship status (divorce, separation, marriage, cohabitation) if a person did not voluntarily submit to having his or her name included on an application, but was a listed participant only because he or she was a member of the household.
- Can individuals change group affiliation?
- What happens to groups that fall below the requirement of 25 individuals, in the event of a unsuccessful appeal, failure-to-report (FTR) listing, loss of hunting privileges, etc.?

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 6 to 4 with 2 members absent.*

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department to track participation.

PROPOSAL 67 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would limit anyone subscribing to the Copper Basin CSH program to hunting moose only in Units 11, 12, and 13 and caribou only in Unit 13 for a period of two years. Hunters would be ineligible to hunt moose and caribou in other parts of the state during the two year period.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters subscribing to the CSH program are restricted to hunting moose in Units 11, 12, and 13 and caribou only in Unit 13 during the regulatory year for which the application was submitted.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? All CSH applicants and their household members would be restricted to hunting moose Units 11, 12, and 13 and caribou in Unit 13 and abide by the restrictions of the Copper Basin CSH hunt for a period of two years. These restrictions include:

For Moose:

- No member of the household may apply for any drawing/Tier I/Tier II/registration moose hunts, or hold general season moose harvest tickets, or hold federal moose permits outside of the CSH hunt area. CSH moose hunters can apply for caribou drawing permits in Unit 13 only.
- No member of the household can apply for or hold state or federal drawing/Tier I/Tier II/registration caribou permits outside the CSH hunt area during the CSH season.

For Caribou:

- No member of the household may apply for any drawing/Tier I/Tier II/registration caribou hunts, or hold general season caribou harvest tickets, or hold federal caribou permits outside of the CSH hunt area. CSH caribou hunters can apply for the moose drawing hunt in Unit 13 only.
- No member of the household can hunt moose outside of the CSH hunt area during the CSH season.

BACKGROUND: In 2011-184-BOG, the board recognized a range of subsistence uses within the use patterns for GMU 13 moose and caribou. The board noted that there are two basic use patterns: 1) a pattern for individuals, families, and other social groups (both within and outside the local area); and 2) “the community-based pattern established by the Ahtna.” The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

The board then created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a “community.” The other options include the general harvest ticket moose hunt (with antler restrictions) and the winter registration “any” bull moose hunt.

DEPARTMENT COMMENTS: The department recommends **TAKE NO ACTION** on this proposal based on the actions taken on Proposal 66, which proposes identical stipulations. See department comments on Proposal 66 for more information.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations voted to **take no action** on this proposal with a vote of 11 to 0 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 68 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would increase the Copper Basin community subsistence harvest (CSH) group size definition from “25 or more members” to “25 or more households”.

WHAT ARE THE CURRENT REGULATIONS? Currently, the formation of any CSH group statewide requires the participation of 25 or more individuals.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department would evaluate groups based on the number of households in each group as a condition for successfully applying to participate in the Copper Basin CSH program. Many of the current Copper Basin CSH groups would not qualify if the proposed requirement of having a minimum of 25 households is adopted, unless the smaller groups combine or add additional households to their group membership (Table 68-1).

BACKGROUND: The department currently evaluates groups based on the number of individuals listed on CSH applications. Each group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.

To participate in the Copper Basin CSH hunt, the participant cannot hold harvest tickets or permits for moose or caribou hunts that occur outside of the CSH hunt area. Based on board guidance, the department processes all permit applications statewide in the following order: Tier II, CSH, Tier I, drawing. Applicants who apply for a Tier II hunt and for the Copper Basin CSH program are removed from the Copper Basin CSH pool if they successfully apply for a Tier II hunt outside of Unit 13. Applicants who apply for the Copper Basin CSH hunt and a Unit 13 Tier I or drawing hunt are removed from the Unit 13 Tier I pool and Unit 13 drawing application pool.

In addition, there are at least six US census-designated communities located on the Alaska road system within or near the hunt area that have fewer than 25 households: Chase, Lake Louise, Mendeltna, Paxson, Tolsona, and Dot Lake, for example . Communities with fewer than 25 households also exist off the road system. These communities could not form their own group, and would need to recruit participants from other areas so that they could participate in this opportunity.

Table 68-1. Number of Copper Basin CSH groups based on number of household, regulatory years 2011 through 2014.

	1 – 12 Households	13 - 24 Households	≥25 Households	Total Groups
2011	0	6	3	9
2012	5	11	3	19
2013	11	27	7	45
2014	6	30	7	43

DEPARTMENT COMMENTS: The department is **NEUTRAL** on decisions related to qualifications and conditions for subsistence hunts. The proposed requirement would not affect the department’s ability to administer the CSH hunt.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 6 to 4 with 2 members absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 69 – 5 AAC 85.045. Seasons and bag limits for moose.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would add “individuals, households, and families” (recognized as a subsistence use pattern in the 2011 BOG findings) to the Copper Basin community subsistence moose hunting regulations when the harvestable surplus exceeds the amount reasonably necessary for subsistence (ANS). It would also shorten the CSH moose season by changing the starting date for the hunt from August 10 to September 1.

WHAT ARE THE CURRENT REGULATIONS?

- The board has made a positive customary and traditional use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive customary and traditional use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive customary and traditional use finding for moose in Unit 13, and found that 300–600 moose are reasonably necessary for subsistence in that unit.
- Resident hunters with Copper Basin CSH harvest reports may harvest 1 bull from August 10–September 20 (CM300, Units 11 and 13) and December 1–31 (CM301, Unit 13 only). In a portion of Unit 12 the Copper Basin CSH season is August 24–28 and September 8–17. The board has established an allocation of 100 bull moose that do not meet general season antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side (Unit 13 and portion of Unit 12) or 3 brow tines (Unit 11). Each CSH group has a bag limit of 1 bull that does not meet general season antler restrictions for every 3 households.
- Resident hunters with general season harvest tickets may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side from September 1–20. Hunters who register for a RM319 permit may harvest 1 bull from December 1–31.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunting season would open on the same date as the general season hunt (September 1). The opportunity to take bulls that do not meet antler restrictions would be open to general season hunters.

BACKGROUND: In 2011-184-BOG, the board recognized a range of subsistence uses within the use patterns for GMU 13 moose and caribou. The board noted that there are two basic use patterns: 1) a pattern for individuals, families, and other social groups (both within and outside the local area); and 2) “the community-based pattern established by the Ahtna.” The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

The board then created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a “community.” The other options include the general harvest ticket moose hunt (with antler restrictions) and the winter registration hunt. With a few exceptions the take of bulls that do not meet antler restrictions has been a provision of subsistence moose hunting regulations in Unit 13 since 1983.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 69-1). In 2009 there was 1 CSH moose group with 378 participants. By 2013 there were 45 groups with 2,066 participants. Participation declined slightly in 2014 to 43 groups with 1,771 participants.

Since 2009 CSH hunters have harvested an average of 114 moose annually, including an average of 75 bulls that do not meet general season antler restriction. General season hunters in Unit 13 harvested an average of 610 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season, while the any-bull hunting opportunity is available (Figure 69-1).

Bull:cow ratios are close to management objectives near easily accessible areas. Current harvests have been decreasing in recent years, though harvest does not appear to be having an adverse effect on bull:cow ratios. The exception to this may be in 13A where the bull ratio observed was 24 bulls:100 cows in 2013; however, the bull:cow ratio in Unit 13A is expected to improve with changes in hunt management and administration.

Table 69-1. Participation and harvest in the CSH hunt in Units 11 and 13 and portion of Unit 12, regulatory years 2009 through 2014.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested
2009	1	19	246	378	100 (70 any bulls)
2010 ¹	-	-	-	-	-
2011	9	31	416	814	91 (64 any bulls) ²
2012	19	29	460	969	101 (76 any bulls) ²
2013	45	41	955	2,066	162 (88 any bull) ²
2014	43	41	893	1,771	148 (76 any bull) ²

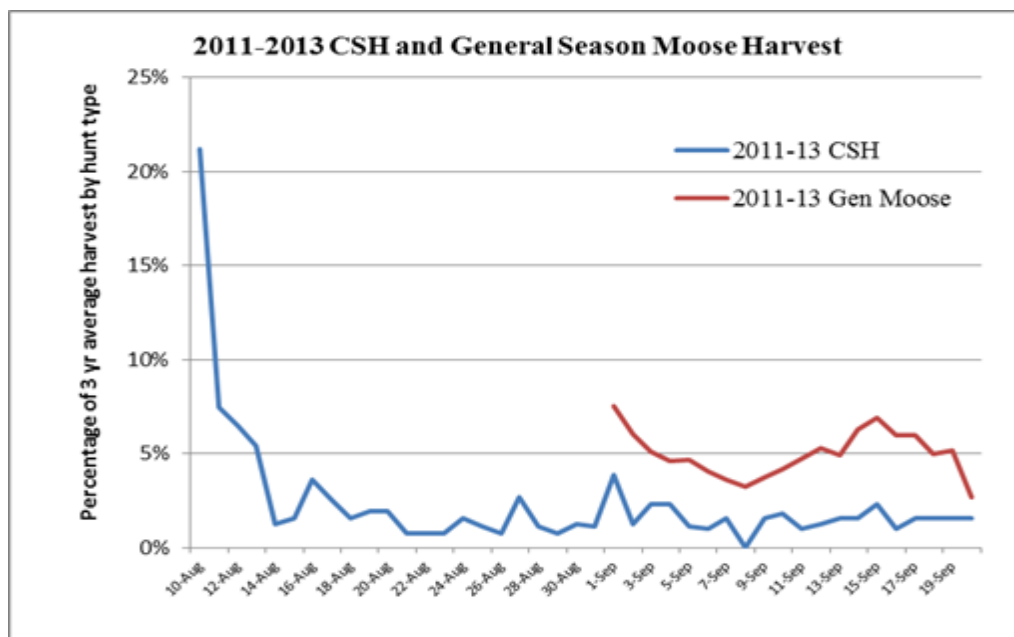
¹ The community hunt was not offered in regulatory year 2010.

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 69-2. Unit 13 moose population objectives and 2013 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3500-4200	5300-6300	2000-3000	5000-6000
2013 abundance estimate	4,000	4,930	1,765	4,950
Bull:cow Objective	25:100	25:100	25:100	25:100
2013 estimate	24	39	57	30

Figure 69-1. Chronology of moose harvest during the fall moose hunting seasons in Unit 13, regulatory years 2011 through 2013.



DEPARTMENT COMMENTS: The department is **NEUTRAL** on changes to the allocation of hunting opportunity between general season and CSH hunters. The department **OPPOSES** take of bulls that do not meet antler restrictions under general harvest tickets because delays in reporting will result in overharvest.

The intent of the proposal appears to be to allow general season hunters with harvest tickets to partake in the harvest of the 100 bulls that do not meet general season antler restrictions allocation. If the board intends to adopt this proposal, the department recommends amending the proposed language to clarify the harvest of one bull per harvest report by community harvest report or by general season harvest ticket. However, because the reporting requirements for general season harvest tickets are not easily enforced it would be impossible to administer the hunt and keep the harvest within the prescribed allocation. This amendment would greatly increase the number of moose harvested in Unit 13 and would be biologically unsustainable. If the board considers the opportunity to take “any bull” necessary for providing reasonable opportunity for all subsistence uses, it may be necessary to limit participation through a Tier II hunt.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **opposed** this proposal with a vote of 5 to 6 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 70 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would provide definitions for “community” and “individuals, families, or other social groups” to the community subsistence harvest (CSH) codified regulations. The proposer requested that ADF&G provide options for definitions but noted that the board will determine which definitions will be added to regulations.

WHAT ARE THE CURRENT REGULATIONS? Currently, there are no definitions of community, individual, or other social groups in regulation. There is a definition of “family” in statute (AS 16.05.940 (33)) as “persons related by blood, marriage, or adoption, and a person living in the household on a permanent basis”.

In order to participate in a community harvest hunt, 25 or more individuals are required to attest to the fact that they are a community or group

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adopting definitions for “community” and “individuals, families, or other social groups” to the Copper Basin community subsistence harvest (CSH) regulations would add some clarity to what is meant by these terms in board findings (2006-170-BOG and 2011-184-BOG).

BACKGROUND: Board of Game finding #2006-170-BOG describes customary and traditional use patterns for moose and caribou in GMU 13 that were “established by Ahtna Athabascan communities within the Copper Basin, and were later adopted by other Alaska residents.” The intent of community subsistence hunts is to provide opportunities to engage in this “community-based” pattern of use, and to enable groups to make efforts to establish this pattern as a “community” (5 AAC 92.072(c)(1)(D)).

Also, in #2011-184-BOG, the board acknowledged that not all participants in subsistence hunts for moose and caribou in GMU 13 participate at the community level. The board provided that “individuals, families, and other social groups” may participate in the Tier I subsistence hunt for caribou and the general hunt for moose. There are many kinds of families, such as a “nuclear family” (a couple and their children), or an extended family (perhaps two or more generations, or two or more nuclear families with a kinship link). Families sometimes occupy a single household or sometimes are in multiple households.

In instances where the board has not defined a term, the common definition is used instead. Social groups” can include (but are not limited to) clubs, teams, clans, tribes, nations, guilds, unions, hunting partnerships or associations, and fraternities and sororities, in addition to communities, households, and families.

Several published definitions provide guidance for understanding the aspects of the meaning of “community”. For each source cited below, the top two definitions are listed here, for convenience. These sources provide good examples of definition, but the board may wish to consider other sources as well.

A. *American Heritage Dictionary* (Fourth edition, 2004). A “community” is:

1.
 - a. A group of people living in the same locality and under the same government.
 - b. the locality in which the group lives.
2.
 - a. A group of people having common interests: ...
 - b. A group viewed as forming a distinct segment of society: ...

B. *Webster’s New Collegiate Dictionary* (1981 edition). A community is:

1. A unified body of individuals, as:
 - a. State, commonwealth
 - b. the people with common interests living in a particular area; broadly, the area itself
 - c. an interacting population of various kinds of individuals (as species) in a common location
 - d. a group of people with a common characteristic or interest living together within a larger society
 - e. a group linked by a common policy
 - f. a body of persons or nations having a common history or common social, economic, and political interests
 - g. a body of persons of common and especially professional interests scattered through a larger society

2. Society at large

C. In the popular on-line reference “Wikipedia” (accessed 10/29/14), the article on “Community” notes that:

“A community is a social unit of any size that shares common values.”

Wikipedia also notes that “One broad definition that incorporates all the different forms of community is ‘a group or network of persons who are connected (objectively) to each other by relatively durable social relations that extend beyond immediate genealogical ties, and who mutually define that relationship

(subjectively) as important to their social identity and social practice’.” (The cited source is James et al. [2012] “Sustainable Communities, Sustainable Development” University of Hawaii Press)

We do not recommend that the board focus on the aspects of a definition of community as a physical place or as the residents of a particular place (as in definition A.1) because, due to court decisions, the board should not use residency to limit eligibility to participate in a hunt.

The board could consider defining “community” as a group of people with common interests and/or values, as in definitions A.2, B.1.g, or the first Wikipedia definition. For the purpose of community hunts, the board could consider the “common interest” that defines communities to be customary and traditional hunting and use of the game populations for which the community subsistence hunt regulations have been authorized.

The second definition quoted in Wikipedia (and in B.1.f) introduces two additional aspects of “community.” The first is “durability:” the community has a history; it is not short lived or “ad hoc.” The second is “identity:” members identify with the group at a non-superficial level. Both “durability” and “identity” appear to be goals of the board in providing opportunities for groups to form as communities to establish hunting traditions consistent with an identified customary and traditional use pattern. The durability and identity aspects of community have also been recognized by the Joint Boards of Fisheries and Game in the process used to identify customary and traditional (C&T) uses. C&T uses have been established by Alaskans after a “long term, consistent pattern of use” (Criterion 1); are characterized by “handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation” (Criterion 6); and provide “substantial economic, cultural, social, and nutritional elements of the subsistence way of life” (Criterion 8).

However, because they are subsistence hunts participation in community hunts cannot be limited to individuals with prior histories of harvest or use of the game population (except under Tier II regulations). Also, the board intended to provide CSH opportunities for groups that wanted to establish themselves as communities engaged in C&T uses of moose or caribou in GMU 13: the board did not require prior existence of a “community of interest.” Therefore, it is recommended that, if the concepts of durability and identity are included in a definition of community, that the language be carefully considered and the decision-making record be full and complete.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Depending on how the board chooses to define community, the change could result in changes to participation in a community harvest hunt. The other definitions may provide some clarity to the board’s previous findings but would have no regulatory effect.

As requested, the department offers the following options for definitions.

92.072 (j) For the purposes of this section, a “community” is a group of people linked by a common interest in, and participation in uses of, a wildlife population that is consistent with the customary and traditional use pattern of that wildlife population as defined by the board.

92.072 (k) For the purposes of this section, and in board finding 2011-184-BOG, “individual” means a single (one) person who is engaged in harvesting and using a wildlife resource for subsistence uses.

92.072 (I) For the purposes of this section, and in board finding 2011-184-BOG, “social group” means two or more people connected by a relationship or a common interest.

The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations supported this proposal with a vote of 10 to 0 with 2 members absent.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the public or to the department.

PROPOSAL 71 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would implement a reporting system and point structure to determine if communities or groups approved to participate in the moose and caribou CSH program are conforming with the intent of the hunt described in BOG findings (2006-170-BOG).

WHAT ARE THE CURRENT REGULATIONS? The current permit conditions for the CSH hunt require that group coordinators write and submit an annual report detailing how groups conform to customary and traditional use patterns described by the board. This permit condition is authorized by 5 AAC 92.072 (c)(1)(D).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would place in regulation a requirement that the department implement a reporting system and point structure that evaluates CSH group patterns of use and how they conform to the customary and traditional pattern of use described in board finding 2006-170-BOG.

BACKGROUND: Hunt conditions for the Copper Basin CSH require that, as part of demonstrating that communities or groups approved to participate in Copper Basin community subsistence hunts for caribou and moose meet the intent of the board in providing for that opportunity, the community or group submit an annual report. However, current annual reports vary in quality and quantity, making evaluation difficult and subjective.

As mentioned in the proposal, each element in the board finding 2006-170-BOG could be measured by a set of indicators that are in turn closely linked to the findings. Each community or group could be given a questionnaire that would more objectively discern how that community or group was observing or attempting to observe the customary and traditional use pattern described in 2006-170-BOG. A draft questionnaire and draft scoring criteria will be posted to the Board of Game website in advance of the meeting.

DEPARTMENT COMMENTS: The department is **NEUTRAL** regarding decisions related to qualifications and conditions for subsistence hunts.

Should the board wish to adopt this proposal, the department recommends the board consider changing, as it deems appropriate, the use of “may” throughout the proposed language to “shall”.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 6 to 5 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department.

PROPOSAL 72– 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would require that the Copper Basin community hunt protocol follow the same basic guidelines of the Unit 13 Tier II system. Points would be given to each community (not individual) based on past use of the resource. Communities or groups that average 22 points or better would be able to participate in the CSH hunt. Given the suggested required score of 22 points, a community or group would be required to show “past use” of the resource in order for the community to qualify for the permit. This proposal also reduces the minimum number of members required statewide to establish a community from 25 to 20.

WHAT ARE THE CURRENT REGULATIONS? The current regulations do not require the department to evaluate and score individuals or communities prior to participation in any CSH program. Statewide, the minimum number of individual participants in a community subsistence hunt is 25.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Each individual applying to participate in the Copper Basin CSH program would be scored based on a modified version of the Unit 13 Tier II scoring system. To qualify as a CSH group, the group’s average score would need to be 22 points or better (25 points maximum). Based on the proposed scoring system, it is likely that groups with members that live long distances from Unit 13, groups containing a high proportion of children in their membership, and groups with a large portion of members with few years of experience using the targeted game populations would not qualify to participate in the hunt.

BACKGROUND: Joint Board of Fisheries and Game regulations on customary and traditional use findings (5 AAC 99.010(b)(1)) state that one of the eight criteria is a long term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation.

The statewide community subsistence harvest hunt permit conditions state that members of a group or residents of a community must “make efforts to ensure that the applicable customary and traditional use pattern described by the board and included by the department as a permit condition,” are followed (5 AAC 92.072(c)(1)(D)). Regulations do not require that the applicant has already established the pattern.

Moreover, the individual application for Copper Basin community subsistence hunts states that individuals have “read and understood the customary and traditional use patterns for uses of Nelchina caribou, moose, and other wild resources described in 2006-170-BOG, summarized in the Community Hunt conditions, and furthermore, that I agree, to the best of my ability, to observe the customary and

traditional use patterns found therein”. Therefore, neither the regulation nor the discretionary permit conditions require “past use” of moose or caribou in the CSH hunt area for participation in the CSHs.

DEPARTMENT COMMENTS: The department is **NEUTRAL** decisions related to qualifications and conditions for subsistence hunts.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **opposed** this proposal with a vote of 1 to 10 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 73 – 5 AAC 92.071. Tier I subsistence permits.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would require participants in the Unit 13 Tier I registration permit hunt (RC566) for caribou to submit a post-season hunt report that would include some of the same elements as the report required for the Copper Basin CSH hunt for caribou. The Copper Basin CSH report asks respondents to describe:

- Use of a wide diversity of resources from the Copper Basin area; and
- A pattern of use of resources in the area that spans several seasons; and
- Close ties with and familiarity of the area, including the existence and development of a long-term pattern of use; and
- Some degree of sharing outside of the household; and
- Incorporation of handing down knowledge through the generations.

WHAT ARE THE CURRENT REGULATIONS? Unit 13 caribou Tier I registration permit holders are required to submit a permit hunt report within 5 days of a successful harvest, or within 15 days of the close of the hunting season. This permit hunt report is used to collect information from hunters to document hunting activities and success. Unit 13 Tier I permit holders and their household members are not eligible for any caribou drawing hunts, or for participation in the Copper Basin caribou CSH, or in federal caribou hunts. In addition, no member of the household is eligible to hunt moose outside Unit 13, either under state or federal regulations. Meat must remain attached to the bone until brought to the place where it is processed for human consumption. No member of the household may proxy hunt for caribou or moose outside of Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would require that participants in the Unit 13 Tier I registration hunt (RC566) for caribou demonstrate that they are engaged in the customary and traditional (C&T) pattern of use as described in #2011-184-BOG, which includes some of the same elements that are used in the community hunt, which is based on the board’s findings at #2006-170-BOG.

The report required for Tier I registration permit hunters would be developed by the Division of Subsistence and approved by the board.

BACKGROUND: In March 2009 the Board established the current amount reasonably necessary for subsistence (ANS) of 600–1,000 Nelchina caribou in Units 12 and 13. When the Nelchina harvestable surplus is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The “Tier I Plus” hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,600 Nelchina caribou have been harvested annually by resident hunters since 2009. Nonresident hunting opportunity has not been offered since 1981. The number of Unit 13 Tier I permits issued has increased yearly since 2009. Over the last three regulatory years there has been an average of 5,840 RC566 Tier 1 caribou permits issued annually. Tier I permits increased from 500 in 2009 to 5,045 in 2012. In 2013, 6,878 Tier I permits were issued, resulting in the harvest of 1,573 caribou (Table 73-1).

Table 73-1. Unit 13 Number of Nelchina caribou hunting permits issued annually and resulting harvest, regulatory years 2011 through 2013.

Year	RC566		CC001		DC480-483		Harvest Quota	Reported Harvest
	Permits	Harvest	Permits	Harvest	Permits	Harvest		
2009	500	277	479	127	-	-	1,000	797
2010 ¹	1,151	615			-	-	2,300	2,439 ²
2011	3,148	1,626	323	87	1,127	319	2,400	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	4,429
2013	6,880	1,573	689	114	5,000	609	2,500	2,640

¹ The CSH caribou hunt was not offered during regulatory year 2010.

² Reported harvest includes caribou taken by hunters with TC566 permits.

The estimated population size for the Nelchina caribou herd was 40,500 caribou in 2013. Composition surveys conducted during October, 2014, observed ratios of 42 bulls:100 cows and 45 calves:100 cows. The Nelchina harvest quota was 3,000 caribou (1,300 cows and 1,700 bulls) in 2014. As of December 1, 2014, 1,000 cows and 1,500 bulls had been reported in the harvest.

In addition to a meat-on-the-bone salvage requirement , participants in the Tier I registration hunt RC566 agree to the following conditions when they apply:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.
- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- Any member of the household may harvest the caribou.

DEPARTMENT COMMENTS: The department is **NEUTRAL** decisions related to qualifications and conditions for subsistence hunts.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **opposed** this proposal by a vote of 4 to 5 with 1 abstention and 1 member absent.*

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department in staff time needed to administer the proposed Tier I registration reporting requirement. Evaluating nearly 6,000 individuals on a yearly basis for conformance to a Tier I pattern would be extremely costly and time-consuming.

PROPOSAL 74 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would require that groups applying for the Community Subsistence Harvest program be approved by the Board of Game.

WHAT ARE THE CURRENT REGULATIONS? Under 5 AAC 92.072 (a), the commissioner may issue community-based subsistence permits and set the conditions for participation. Approval by the board is not required as a condition for a permit (5 AAC 92.072(c)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

- The Division of Subsistence would develop a group application process.
- The Division of Subsistence would review and comment on the completeness and content of the application.
- The board would review and approve or reject the applications annually during its work session.
- Each group coordinator would be given an opportunity to provide public comments.

This process would need to occur at a regularly scheduled board meeting or at a special board work session one year prior to the hunt so that groups would be approved for the November-December application period.

BACKGROUND: In 2011-184-BOG, the board recognized a range of subsistence uses within the use patterns for GMU 13 moose and caribou. The board noted that there are two basic use patterns: 1) a pattern for individuals, families, and other social groups (both within and outside the local area); and 2) “the community-based pattern established by the Ahtna.” The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

The board then created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a “community.” The other options include the general harvest ticket moose hunt (with antler restrictions) and the winter registration “any” bull moose hunt.

The board identifies community subsistence hunt areas at 5 AAC 92.074 and 5 AAC 92.072 (b). Under a delegation to the commissioner, 5 AAC 92.072(c) describes the conditions to be met by “residents of the community or members of a group,” which include establishment of a hunt coordinator, listing the names and other information of participants, ensuring harvest tickets are returned, and making efforts to ensure

the pattern of use is followed, Thus, under current regulations, board action is not required for approval of applications for community-based subsistence hunting by communities or groups; board action is needed only to identify the areas and any hunt conditions it wishes to require.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on decisions related to qualifications and conditions for subsistence hunts.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 7 to 4 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department in staff time and administration.

PROPOSAL 75 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would change reporting requirements and reinstate antler destruction requirements for moose harvested under the CSH program in Unit 13.

WHAT ARE THE CURRENT REGULATIONS? Copper Basin CSH hunters currently report moose harvest within 24 hours of kill, or within 15 days of the season closure. Hunters are required to show antlers to ADF&G or law enforcement only if contact is made in the field. There is no antler destruction requirement.

The community hunt area authorized for the Copper Basin includes Unit 11, as well as a portion of Unit 12.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Successful Copper Basin CSH moose hunters would be required to bring moose harvested from Unit 13 to Cantwell or to the Glennallen Fish and Game office immediately after leaving the field to report. Because the department does not have an office in Cantwell, the department would need to implement a temporary check station for hunters.

BACKGROUND: From 2009 – 2011 the board allocated 100 bulls that do not meet general season antler restrictions to Copper Basin CSH hunters. From 2011 – 2013 that allocation was decreased to 70, and in 2013 that allocation was increased back to 100. Since 2009 CSH hunters have harvested an average of 114 moose annually from the entire Copper Basin CSH area, including an average of 75 bulls that do not meet general season antler restrictions. General season hunters harvested an average of 610 moose annually during the same period and in the same units (Units 13, 11, and portion of Unit 12). Much of the Copper Basin CSH harvest occurs during the first ten days of the season, while the opportunity to harvest bulls that do not meet general season antler restrictions is available.

Bull:cow ratios are close to management objectives near easily accessible areas in Unit 13. Current harvests in the unit have been decreasing in recent years, though harvest does not appear to be having an

adverse effect on bull:cow ratios. The exception to this may be in Unit 13A where the bull ratio observed was 24 bulls:100 cows in 2013; however, the bull:cow ratio in Unit 13A is expected to improve with changes in hunt management and administration.

Table 75-1. Participation and harvest in the CSH hunt in Units 11 and 13 and portion of Unit 12, regulatory years 2009 through 2014.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested
2009	1	19	246	378	100 (70 any bulls)
2010 ¹	-	-	-	-	-
2011	9	31	416	814	91 (64 any bulls) ²
2012	19	29	460	969	101 (76 any bulls) ²
2013	45	41	955	2,066	162 (88 any bull) ²
2014	43	41	893	1,771	148 (76 any bull) ²

¹ The community hunt was not offered in regulatory year 2010.

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 75-2. Unit 13 moose population objectives and 2013 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500-4,200	5,300-6,300	2,000-3,000	5,000-6,000
2013 abundance estimate	4,000	4,930	1,765	4,950
Bull:cow Objective	25:100	25:100	25:100	25:100
2013 estimate	24	39	57	30

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal. Adoption of this proposal would require the department to develop and maintain a check station in Cantwell. The department would also need to keep the Glennallen office and Cantwell check station staffed through weekends to minimize impacts to the hunting public. These impacts include increased travel time after departing from the field, the potential for meat spoilage for animals harvested during the weekends, and increased costs of travel (food and lodging). Check stations are not widely used by ADF&G because the costs of maintaining and staffing a check station are prohibitive. In addition, compliance with the check station would be voluntary. The department does not have the authority or ability to enforce a check station requirement if hunters do not stop their vehicles at the designated location.

The board has not required antler destruction for this hunt in the past because destroying antlers would make it difficult to determine antler width in relation to the 50-inch bag limit. It is also not needed to prevent an over-harvest of the moose population. If the board adopts an antler destruction requirement the department recommends that the antler destruction occur after inspection by an ADFG representative.

The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations supported this proposal with a vote of 6 to 5 with 1 member absent.

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the public and to the department. Costs to the department include increased staff time, over-time wages, salaries for hiring

additional staff, travel costs, lodging and per diem, and costs of maintaining and transporting a check station facility.

PROPOSAL 76– 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would require that moose antlers taken through the Copper Basin CSH hunt be turned in to the department, and that the department sell the antlers to help recover costs of administering the CSH.

WHAT ARE THE CURRENT REGULATIONS? Currently hunters are allowed to keep antlers of moose harvested in association with the CSH.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Antlers turned into the department would be used to help the department acquire harvest information and revenue from sale of the antlers at auction would supplement funds used to manage the hunt.

BACKGROUND: From 2009 – 2011 the board allocated 100 bulls that do not meet general season antler restrictions to CSH hunters. From 2011 – 2013 that allocation was decreased to 70, and in 2013 that allocation was increased back to 100. Since 2009 CSH hunters have harvested an average of 114 moose annually, including an average of 75 bulls that do not meet general season antler restriction (“any bull”). General season hunters harvested an average of 610 moose annually during the same period from the same area (Units 11, 13, and portion of Unit 12). Much of the CSH harvest occurs during the first ten days of the season, while the any-bull hunting opportunity is available.

Bull:cow ratios are close to management objectives near easily accessible areas. Current harvests have been decreasing in recent years, though harvest does not appear to be having an adverse effect on bull:cow ratios. The exception to this may be in Unit 13A where the bull ratio observed was 24 bulls:100 cows in 2013; however, the bull:cow ratio in Unit 13A is expected to improve with changes in hunt management and administration.

Table 76-1. Participation and harvest in the CSH hunt in Units 11 and 13 and portion of Unit 12, regulatory years 2009 through 2014.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested
2009	1	19	246	378	100 (70 any bulls)
2010 ¹	-	-	-	-	-
2011	9	31	416	814	91 (64 any bulls) ²
2012	19	29	460	969	101 (76 any bulls) ²
2013	45	41	955	2,066	162 (88 any bull) ²
2014	43	41	893	1,771	148 (76 any bull) ²

¹ The community hunt was not offered in regulatory year 2010

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 76-2. Unit 13 moose population objectives and 2013 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3500-4200	5300-6300	2000-3000	5000-6000
2013 abundance estimate	4,000	4,930	1,765	4,950
Bull:cow Objective	25:100	25:100	25:100	25:100
2013 estimate	24	39	57	30

DEPARTMENT COMMENTS: The department is **NEUTRAL** is on this proposal because the requirement for hunters to surrender antlers to the department is not necessary to prevent an over-harvest of the moose population. Antler salvage is not required for hunts that do not have an antler restriction, making it difficult to evaluate the category of bull harvested and compliance with the group's bag limit (1 any-bull per household).

The department currently has a program to auction antlers and the proceeds from the auction are applied to the Fish and Game Fund, which is allocated to management; however there would be costs associated with administering an antler auction program, such as shipping, storage, and staff time. Additionally, the department has not identified a need to collect information on moose antler morphology to improve the management of Unit 13 moose hunts; however, the requirement could be used to verify moose antler configuration reported by the hunters.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations voted to **take no action** on this proposal with a vote of 11 to 0 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal will increase administrative costs for the department, including staff time, antler storage, and shipping the antlers to auction. The revenue generated from this program will be minimal and may be insufficient to fully cover administration of the proposed hunt condition.

PROPOSAL 77 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would establish a firm moose quota per subunit in the Unit 13 portion of the Copper Basin CSH area for bulls that do not meet general season antler restrictions.

WHAT ARE THE CURRENT REGULATIONS? The board allocated up to 100 bulls that do not meet general season antler restrictions to the CSH hunt. The department distributes this allocation among subunits based on information collected during moose surveys. A CSH group's bag limit for any bulls is 1 bull that does not meet general season antler restrictions for every 3 households. The Copper Basin CSH area for moose is all of Units 11 and 13, and a portion of Unit 12.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted the department would still distribute the 100 any-bull allocation among the subunits based on survey data. The department would manage each quota separately for the duration of the hunting season. The department would not calculate the total any-bull harvest in season to evaluate if harvests meet or exceed the CSH allocation (up to 100 any-bull moose). If a subunit quota is exceeded, the additional animals taken would not be used as a justification to change the bag limit in any other hunt area.

Due to the unavoidable lag time in harvest reporting and hunt administration, the department anticipates that harvests will exceed subunit quotas at some point. Depending on the amount of harvest, it is also possible that the annual CSH allocation of 100 any-bulls will also be exceeded in some years.

BACKGROUND: The department distributes the any-bull allocation between subunits based on information collected during surveys of the moose population and estimates of sustainable harvest. The separate subunit quotas are currently managed cumulatively to maintain the any-bull harvest within the prescribed allocation. In some years this resulted in the closure of some hunt areas that did not meet the individual subunit quota. This is particularly noticeable in 2013 when Unit 13A exceeded the harvest quota by 26 moose (Table 77-1).

In 2014 the department required a shorter time period for reporting harvest (within 24 hours of kill) and was able to keep the harvest close to the prescribed quotas. The adoption of the Copper Basin CSH bag limit of 1 any-bull per 3 households and locking tag requirement are also thought to have slowed the harvest, making the hunt more manageable.

Table 77-1. Community subsistence harvest and harvest of bulls that do not meet general season antler requirements, Copper Basin CSH hunt area, regulatory years 2012 through 2013.

Unit	2012		2013		2014	
	Quota	Harvest	Quota	Harvest	Quota	Harvest
13A	12	15	16	42	6	8
13B	17	23	26	23	26	25
13C	10	14	16	1	16	9
13D	8	8	11	7	11	13
13E	13	16	21	12	21	21
11Z	10	0	10	0	10	0
<i>Total</i>	<i>70^a</i>	<i>76</i>	<i>100</i>	<i>85</i>	<i>90^b</i>	<i>76</i>

^a The 2012 CSH moose allocation was 70 any-bulls in 2012.

^b The 2014 CSH harvest quota was reduced by 10 any-bull moose that were not available due to the low bull ratio observed in Unit 13A. Hunt area 13A West was closed to the taking of bulls that did not conform to general season antler requirements during the 2014 CSH season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it does not present an immediate biological concern to the moose population. Subunit quotas are set annually by the department based on the most recent survey information with the goal of achieving a sustainable harvest for the hunt area in that subunit. Moose harvest in any given subunit does not change the moose harvest potential in a separate subunit. By setting the allocation of up to 100 any-bull moose in regulation, the department is legally bound to keep the total harvest at 100 any-bulls or less.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 8 to 2 with 2 members absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 78 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would require a shorter reporting period for hunters to report moose taken during the “any bull” harvest period in the Unit 13 portion of the Copper Basin CSH hunt area; specifically, hunters would be required to report within 12 or 24 hours by telephone or Internet.

WHAT ARE THE CURRENT REGULATIONS? Under 5 AC 92.052(14) the department has the discretionary authority to set a time limit for reporting requirements. During the 2014 hunt a 24 hour harvest reporting requirement was instituted for the Copper Basin CSH moose hunt as a permit condition.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department would use its discretionary authority to implement a 12 or 24 hour reporting requirement.

BACKGROUND: Prior to 2013, the reporting requirement for the CSH hunt was within 5 days of taking the bag limit. In 2013 the reporting requirement was reduced to within 24 hours of taking the bag limit or returning from the field. In 2014, the reporting requirement was reduced again to within 24 hours of taking the bag limit.

Any bull harvest quotas were exceeded in 4 of the 6 Copper Basin CSH hunt areas in 2012, 1 of 6 in 2013, and 1 of 6 in 2014. In addition, the combined harvests exceeded the CSH hunt allocation in 2012 and lead to a premature closure of the hunt in 2013 because the hunt managers were unsure of how many moose had been taken but not reported.

In 2014, the department required a shorter time period for reporting harvest and was able to keep the harvest close to the prescribed quotas. The adoption of the Copper Basin CSH moose bag limit of 1 any-bull per 3 households and locking tag requirement are also thought to have slowed the harvest, making the hunt more manageable.

Table 78-1. CSH any-bull quotas, harvest, and EO closure dates, regulatory years 2012 through 2014.

Unit	2012			2013			2014		
	Quota	Harvest	EO	Quota	Harvest	EO	Quota	Harvest	EO
13A	12	15	8/15	16	42	8/14	6	8 ^a	8/14
13B	17	23	9/3	26	23	8/16	26	25	8/26
13C	10	14	9/17	16	1	8/16	16	9	
13D	8	8	8/28	11	7	8/16	11	13	8/31
13E	13	16	9/13	21	12	8/16	21	21	8/15
11Z	10	0	9/17	10	0	8/16	10	0	
Total	70 ^b	76		100	85		90 ^c	76	

^a In 2014, the harvest exceeded the subunit quota in Unit 13A due to the number of moose taken in 13A West, which was closed to the taking of bulls that did not conform to general season antler requirements

during the 2014 CSH season. The harvest quota in 13A East, where the any-bull bag limit was authorized, was not exceeded during the 2014 season.

^b The 2012 CSH moose allocation was 70 any-bulls in 2012.

^c The 2014 CSH harvest quota was reduced by 10 any-bull moose that were not available due to the low bull ratio observed in Unit 13A. Hunt area 13A West was closed to the taking of bulls that did not conform to general season antler requirements during the 2014 CSH season.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because the short reporting requirement provides timely information critical to managing the harvest in-season within the prescribed quotas and allocation; however, the department recommends using a constant reporting requirement throughout the duration of the hunting season, regardless of bag limit changes.

The department implemented a requirement on CSH hunters to report moose harvest within 24 hours of kill in regulatory year 2014. This is the shortest reporting period required for the CSH hunt to date. The 2014 season was the first year in which the department was able to maintain the harvest within the prescribed quotas and the any-bull bag limit was authorized throughout the duration of the season for subunits that did not reach the subunit any-bull quota.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 10 to 0 with 2 members absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 79 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal directs the department to open and close the Copper Basin CSH any-bull moose season on certain days (including weekends) if necessary for conservation and/or to not exceed the any-bull quota.

WHAT ARE THE CURRENT REGULATIONS? Under 5 AC 92.052(12) the department has the discretionary authority to specify time periods in which the permittee may hunt.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Based on board guidance through regulations, the department would limit the CSH hunt to specific days to facilitate timely reporting and provide additional time for in-season management decisions. By restricting time periods in which hunters can hunt, the hunt would be structured in a manner that prevents hunting during periods when communication between hunters and hunt managers is poor. This change would facilitate hunt administration by giving hunters more time to report their harvest and by giving hunt managers time to make in-season management decisions and distribute of emergency order (EO) information. Reducing communication delays would help managers maintain the harvest within the prescribed subunit quotas.

BACKGROUND: Prior to 2013 the reporting requirement for the Copper Basin CSH moose hunt was within 5 days of taking the bag limit. In 2013 the reporting requirement was reduced to within 24 hours of taking the bag limit or returning from the field. In 2014, the reporting requirement was reduced again to within 24 hours of taking the bag limit.

Harvest quotas were exceeded in 4 of the 6 Copper Basin CSH hunt areas in 2012, 1 of 6 in 2013, and 1 of 6 in 2014. In addition, the combined harvests exceeded the hunt allocation in 2012 and lead to a premature closure of the hunt in 2013 because the hunt managers were unsure of how many moose had been taken but not reported.

In 2014 the department required a shorter time period for reporting harvest in the CSH and was able to keep the harvest close to the prescribed quotas. The adoption of the Copper Basin CSH moose bag limit of 1 any-bull per 3 households and locking tag requirement are also thought to have slowed the harvest, making the hunt more manageable.

Table 79-1. CSH any-bull quotas, harvest, and EO closure dates, regulatory years 2012 through 2014.

Unit	2012			2013			2014		
	Quota	Harvest	EO	Quota	Harvest	EO	Quota	Harvest	EO
13A	12	15	8/15	16	42	8/14	6	8 ^a	8/14
13B	17	23	9/3	26	23	8/16	26	25	8/26
13C	10	14	9/17	16	1	8/16	16	9	
13D	8	8	8/28	11	7	8/16	11	13	8/31
13E	13	16	9/13	21	12	8/16	21	21	8/15
11Z	10	0	9/17	10	0	8/16	10	0	
<i>Total</i>	<i>70^b</i>	<i>76</i>		<i>100</i>	<i>85</i>		<i>90^c</i>	<i>76</i>	

^a In 2014, the harvest exceeded the subunit quota in Unit 13A due to the number of moose taken in 13A West, which was closed to the taking of bulls that did not conform to general season antler requirements during the 2014 CSH season. The harvest quota in 13A East, where the any-bull bag limit was authorized, was not exceeded during the 2014 season.

^b The 2012 CSH moose allocation was 70 any-bulls in 2012.

^c The 2014 CSH harvest quota was reduced by 10 any-bull moose that were not available due to the low bull ratio observed in Unit 13A. Hunt area 13A West was closed to the taking of bulls that did not conform to general season antler requirements during the 2014 CSH season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. During the 2014 hunt the department implemented a 24-hour reporting requirement and was able to maintain the harvest within objectives. The reduction in the group's bag limit to 1 any-bull for every 3 households is also attributed with slowing the rate of harvest and facilitating hunt management. The department does not see a clear need to use its discretionary authority to limit hunt periods at this time.

The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations supported this proposal with a vote of 7 to 4 with 1 member absent.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 80 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal restricts moose hunters from using motorized vehicles (with exceptions) in Units 13, 11, and portions of 12 during the periods August 18–22, and August 25–28. This proposal also shortens the CSH moose season in Units 11 and 13 by changing the opening date from August 10 to August 18.

WHAT ARE THE CURRENT REGULATIONS? There are currently no restrictions on the use of motorized vehicles in association with the CSH hunt other than the restrictions on use of aircraft in “same day airborne” activities, and the general prohibition of motorized vehicles within controlled use areas. Open season for the fall hunt in Units 11 and 13 is August 10–September 20. Open season in the portion of Unit 12 is August 24–28 and September 8–17.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal will delay the start of the CSH hunt in Units 11 and 13 until August 18; however, this delay is not expected to significantly change the number of moose harvested. If applied to the Copper Basin CSH in the portion of Unit 12, it would increase the season by 6 days.

Preventing hunters from using motorized vehicles in the field will prevent some hunters from receiving EO notices and complying with reporting requirements in areas with no cellular telephone service or Internet access. It is difficult to anticipate whether or not the adoption of this proposal would significantly increase or reduce the harvest.

BACKGROUND: Since 2009 CSH hunters have harvested an average of 114 moose annually, including an average of 75 bulls that do not meet general season antler restriction (“any bull”). General season hunters harvested an average of 610 moose annually during the same period in the same units as the Copper Basin CSH (Units 11 and 13, and a portion of Unit 12). Much of the CSH harvest occurs during the first ten days of the season, while the any-bull hunting opportunity is available.

Since 2011, 66% of CSH hunters reported using airplanes, boats, 4-wheelers, or ATVs to access the CSH hunt area. Of these hunters 77% reported using 4-wheelers. Highway vehicle was the means of access for 33% of these hunters, and 1% of CSH hunters reported accessing the CSH hunt area by foot.

Bull:cow ratios are close to management objectives near easily accessible areas. Current harvests have been decreasing in recent years, but do not appear to be having an adverse effect on bull:cow ratios. The exception to this may be in Unit 13A where the bull ratio observed was 24 bulls:100 cows in 2013; however, the bull:cow ratio in Unit 13A is expected to improve with changes in hunt management and administration.

Table 80-1. Participation and harvest in the CSH hunt in Units 11 and 13 and portion of Unit 12, regulatory years 2009 through 2014.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested
2009	1	19	246	378	100 (70 any bulls)
2010 ¹	-	-	-	-	-

2011	9	31	416	814	91 (64 any bulls) ²
2012	19	29	460	969	101 (76 any bulls) ²
2013	45	41	955	2,066	162 (88 any bull) ²
2014	43	41	893	1,771	148 (76 any bull) ²

¹ The community hunt was not offered in regulatory year 2010.

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 80-2. Unit 13 moose population objectives and 2013 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500-4,200	5,300-6,300	2,000-3,000	5,000-6,000
2013 abundance estimate	4,000	4,930	1,765	4,950
Bull:cow Objective	25:100	25:100	25:100	25:100
2013 estimate	24	39	57	30

DEPARTMENT COMMENTS: The department is **NEUTRAL** on delaying the start of the CSH season to August 18 in Units 11 and 13 because the decision affects the allocation of moose hunting opportunity and is not expected to alter harvest significantly. Based on the most recent survey information the current hunt structures are providing a sustainable level of harvest of the moose population. A restriction on motorized access has potential to delay timely reporting, which is necessary for in-season management.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **opposed** this proposal with a vote of 1 to 7 with 3 abstentions and 1 member absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 81 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit CSH hunters from hunting moose or caribou for one day after the use of off-road motorized vehicles. The motorized use day would end at midnight of the day an off-road vehicle was used.

WHAT ARE THE CURRENT REGULATIONS? There are currently no restrictions on the use of off-road vehicles in association with the CSH hunt other than the general prohibition of motorized vehicles within controlled use areas.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would prohibit CSH hunters from hunting moose or caribou for one day after the use of off-road motorized vehicles. The motorized use day would end at midnight of the day an off-road vehicle was used. It is difficult to anticipate whether or not the adoption of this proposal would significantly reduce the harvest during the early season.

BACKGROUND: From 2009 – 2011 the board allocated 100 bulls that do not meet general season antler restrictions to CSH hunters. From 2011 – 2013 that allocation was decreased to 70, and in 2013 that allocation was increased back to 100. Since 2009 CSH hunters have harvested an average of 114 moose annually, including an average of 75 bulls that do not meet general season antler restriction (“any bull”). General season hunters harvested an average of 610 moose annually during the same period in the same units (Units 11 and 13 and a portion of Unit 12). Much of the CSH harvest occurs during the first ten days of the season, while the any-bull hunting opportunity is available.

Since 2011, 66% of CSH hunters reported using either airplanes, boats, 4-wheelers, or ATVs to access the CSH hunt area. Of these hunters 77% reported using 4-wheelers. Highway vehicle was the means of access for 33% of these hunters, while 1% of CSH hunters reported accessing the CSH hunt area by foot.

Bull:cow ratios are close to management objectives near easily accessible areas. Current harvests have been decreasing in recent years, though harvest does not appear to be having an adverse effect on bull:cow ratios. The exception to this may be in Unit 13A where the bull ratio observed was 24 bulls:100 cows in 2013; however, the bull:cow ratio in Unit 13A is expected to improve with changes in hunt management and administration.

Table 81-1. Participation and harvest in the CSH hunt in Units 11 and 13 and a portion of Unit 12, regulatory years 2009 through 2014.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested
2009	1	19	246	378	100 (70 any bulls)
2010 ¹	-	-	-	-	-
2011	9	31	416	814	91 (64 any bulls) ²
2012	19	29	460	969	101 (76 any bulls) ²
2013	45	41	955	2,066	162 (88 any bull) ²
2014	43	41	893	1,771	148 (76 any bull) ²

¹ The community hunt was not offered in regulatory year 2010.

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 81-2. Unit 13 moose population objectives and 2013 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500-4,200	5,300-6,300	2,000-3,000	5,000-6,000
2013 abundance estimate	4,000	4,930	1,765	4,950
Bull:cow Objective	25:100	25:100	25:100	25:100
2013 estimate	24	39	57	30

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it is not expected to alter harvest significantly. Based on the most recent survey information the current hunt structures are providing a sustainable level of harvest of the moose population.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **opposed** this proposal with a vote of 0 to 9 with 2 abstentions and 1 member absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 82 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would direct the department to administer the Unit 13 CSH program for caribou so that the CSH caribou season (August 10–September 20 and October 21–March 31) will continue as long as the CSH allocation of 300 and the overall harvest quota are not exceeded.

WHAT ARE THE CURRENT REGULATIONS? The board placed a 300 caribou cap on the CSH hunt. Based on guidance from the board, the department closes all Nelchina caribou hunts simultaneously when the entire Nelchina harvest quota has been reached.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The allocation of 300 caribou for the CSH hunt from the Nelchina harvest quota may result in closure of all other hunts to ensure this allocation. The CSH hunt would continue for the duration of the season listed in codified, or until the harvest of 300 caribou have been reported by CSH hunters. The proposal does allow the department to close the CSH season when the overall harvest quota for the Nelchina caribou herd has been reached.

BACKGROUND: Since the CSH hunt was developed in 2009, the CSH harvest cap of 300 caribou has not been met, even during years the hunting season remained open until March 31 (regulatory years 2009 and 2012; Table 82-1). With increasing participation in all Nelchina caribou hunts (Tier I CSH, Tier I registration, and draw) and the looming possibility of reduced quotas for the Nelchina caribou herd, the department need additional guidance on how the CSH allocation was to be administered relative to the other hunts. During the January 2012 Board of Game work session, the department asked the board for additional guidance, and the board instructed the department to close all state hunts at the same time, when the in-season harvest quota was met.

There is a positive customary and traditional use finding for caribou in Units 12 and 13 (Nelchina herd), and the board has found that 600–1,000 caribou are reasonably necessary for subsistence in these two units combined.

Table 82-1. Nelchina caribou harvest by participants in the CSH program, regulatory years 2009–2013.

Regulatory Year	Harvest				CSH Allocation	EO Closure Date
	Bulls	Cows	Unknown	Total		
2009	125	0	2	127	300	-
2011	71	16	0	87	300	December 6
2012	99	51	0	150	300	-
2013	101	13	0	114	300	October 10

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou harvest to the CSH hunt. The department would have to modify its current management, but does not anticipate difficulties implementing the proposed change.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **supported** this proposal with a vote of 10 to 0 with 2 members absent.*

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 83 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions.

PROPOSED BY: The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations

WHAT WOULD THE PROPOSAL DO? This proposal would discontinue the Copper Basin CSH program for moose when the harvestable surplus exceeds the minimum amount reasonably necessary for subsistence (ANS) and replaces it with a weighted drawing permit hunt for Alaska residents only. The proposal also increases the nonresident allocation by increasing the number of permits available from 150 to 250.

WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters with CSH harvest reports may harvest 1 bull from August 10–September 20 in Units 11 and 13 (CM300) and December 1–31 (CM301) in Unit 13. In a portion of Unit 12, the season is August 24–28 and September 8–17 for one antler-restricted bull. The board has established an allocation of 100 bull moose that do not meet general season antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines in Unit 11, 4 or more brow tines in Units 13 and a portion of Unit 12. Each CSH group has a bag limit of 1 any-bull for every 3 households.
- Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side from September 1–20. Hunters who register for a Unit 13 RM319 permit may harvest 1 bull from December 1–31.
- Resident hunters who successfully apply for a Unit 13 drawing permit are allowed to harvest 1 antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Nonresident hunters who successfully apply for a Unit 13 drawing permit are allowed to harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side from September 1–20; up to 150 permits may be issued.
- The current ANS for moose is 30–40 moose in Unit 11, 60–70 in Unit 12, and 300–600 in Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The Copper Basin CSH hunt area includes Units 11, 13, and a portion of Unit 12. The proposal offers an alternative hunt

structure for Unit 13 but does not recommend changes to the CSH hunt in Units 11 and 12. If adopted the CSH program for moose would be eliminated in Unit 13 when the harvestable surplus is above 300 moose.

The proposed hunt structure in Unit 13 would replace the current CSH program with a weighted draw for resident hunters. The department would be authorized to issue up to 100 permits for any moose (bull or cow) and could issue an additional 25 permits for antlerless moose (cow only) during a September 1–20 season. The proposal also increases the nonresident allocation by increasing the number of permits available from 150 to 250.

BACKGROUND: A weighted drawing permit system means that hunters drawn in previous years for the same drawing permit hunt are not drawn again until all applicants that keep applying for this specific hunt have been drawn. New drawing applicants rise up in preference by accumulating years of consistent application. This is similar to a bonus point system used by other states where submitting repeated applications increases the applicants chance of being drawn, but differs in that a successful applicant cannot be drawn again for the same hunt until all of the other applicants, who applied previously, have been drawn.

The moose populations in Units 11 and 13 are thought to be stable or increasing and are currently above the objective for bull to cow ratio, with the exception of Unit 13A. Based on an extrapolation from trend survey areas, the most recent fall population estimate for Unit 13 was 17,200 moose with 40 bulls:100 cows and 22 calves:100 cows.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity between resident hunters and between resident and nonresident hunters in Unit 13. Because the weighted drawing hunt has not been established in codified regulation, the board will need to adopt additional regulatory language to establish the weighted drawing hunt structure in codified regulation.

Drawing hunts have not been found to provide a reasonable opportunity for subsistence; if adopted, the board should clearly state how reasonable opportunity for success in subsistence uses will continue to be provided.

The department anticipates administrative challenges in implementing the proposed structure, which tracks hunters through time. The ability to track hunters more efficiently with personal identification codes or user accounts has been proposed, but has not been implemented by the department. The department will also need additional regulatory language on how to administer the additional points accumulated through repeated application. This proposal suggests that, if an applicant does not apply for this hunt in each consecutive year (“consistent application”), the applicant would be moved to the bottom of the list and treated as a new applicant by the system when they reapply. Additional regulatory language will also be needed on how much weight the department should apply to consecutive applications.

*The Board of Game Committee on Copper Basin Area Subsistence Hunting Regulations **opposed** this proposal with a vote of 4 to 7 with 1 member absent.*

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department.

PROPOSAL 84 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Outdoor Council

WHAT WOULD THE PROPOSAL DO? This proposal would change all “any bull” hunts in Unit 13 to a single drawing hunt and the bag limit would be one bull or antlerless moose by weighted drawing permit.

WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters with CSH harvest reports may harvest 1 bull from August 10–September 20 in Units 11 and 13 (CM300) and December 1–31 (CM301) in Unit 13. The Copper Basin CSH season in a portion of Unit 12 is August 24–28 and September 8–17. The board has established an allocation of 100 any-bull moose (bull moose that do not meet general season antler restrictions) to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to 1 bull with spike-fork antlers or 50-inch antlers or antlers with 3 or more brow tines in Unit 11, and 4 or more brow tines in Units 13 and a portion of Unit 12. Each CSH group has a bag limit of 1 any-bull for every 3 households.
- Resident hunters with general season harvest tickets for Unit 13 may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side from September 1–20. Hunters who register for a RM319 permit in Unit 13 may harvest 1 bull from December 1–31.
- Resident hunters who successfully apply for a drawing permit are allowed to harvest 1 antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Nonresident hunters who successfully apply for a drawing permit are allowed to harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side from September 1–20; up to 150 permits may be issued.
- The current amount reasonably necessary for subsistence (ANS) for moose in Unit 13 is 300–600 moose.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposed hunt structure would remove the 100 any-bull allocation from the CSH program in Unit 13 and create a weighted draw for residents. Because the proposal does not call for repeal of the CSH regulations, it is assumed that hunters could still participate in the CSH program with a bag limit that conforms to the general season antler requirements in Unit 13, or in the CSH program in Units 11 and a portion of Unit 12.

The new Unit 13 weighted draw hunt would have a bag limit of 1 bull or 1 antlerless moose (1 moose), but the proposal does not offer suggestions for season dates or a limit on the number of any-bulls that may be taken. Because the proposal change the hunt structure associated with the Unit 13 CSH any-bull allocation to a weighted drawing hunt, it is assumed that the season for the new weighted drawing hunt would match the current CSH season of August 10–September 20.

BACKGROUND: Weighted means that once a person is drawn for a permit, that individual would drop to the bottom of the applicant list during the next application period. The person would advance to the top of future applicant lists over time. The moose populations in Units 11 and 13 are thought to be stable or increasing and are currently above the objective for bull to cow ratio, with the exception of Unit 13A. Based on an extrapolation from trend survey areas, the most recent fall population estimate for Unit 13 was 17,200 moose with 40 bulls:100 cows and 22 calves:100 cows.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity between resident hunters in Unit 13. Because the weighted drawing hunt has not been established in codified regulation, the board will need to adopt additional regulatory language to establish the weighted drawing hunt structure in codified regulation.

The department anticipates administrative challenges in implementing the proposed structure, which tracks hunters through time. The department's ability to track hunters more efficiently with personal identification codes or user accounts has been discussed, but changes have not been implemented. The department will also need additional direction on how to administer the additional points accumulated through repeated application. Specifically, direction will be needed on how much weight the department should apply to consecutive applications.

This proposal differs from Proposal 84 because it recommends that applicants gain points through "continued application", and there is no discussion of applicants moving to the bottom of the list until "all other applicants who keep applying for the specific drawing hunt have been drawn".

Drawing hunts have not been found to provide a reasonable opportunity for subsistence; if adopted, the board should clearly state how reasonable opportunity for success in subsistence uses will continue to be provided.

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department.

PROPOSAL 85 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: Kenneth Manning

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the Copper Basin CSH hunt for caribou. Tier I or Tier II permit holders would be allowed to pool permits to create groups.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three permit hunt structures.

- Tier I caribou registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually. There is a meat salvage requirement, and restrictions on applicants and their household members from participating in other caribou and moose hunts and in proxy hunting.

- Tier I community subsistence harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I CSH permits that may be issued annually. Although the Copper Basin hunt area includes Unit 11 and a portion of Unit 12, the Copper Basin CSH for caribou is allowed only in Unit 13. There are permit conditions on salvage, sharing, and reporting.
- There are four drawing permit hunts for caribou in Unit 13 (DC480–DC483). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of 1 caribou.
- The amount reasonably necessary for subsistence (ANS) for the Nelchina caribou herd in Units 12 and 13 is 600–1,000 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would eliminate the CSH hunt as an option for Nelchina caribou hunters. Current participants in the CSH program would need to apply for either Tier I or Tier II hunts and abide by hunt conditions that are currently in place. Individual hunters would be allowed to pool permits into a community hunt structure, provided that ADF&G approve customary and traditional practices that result from the pooling of permits.

BACKGROUND: When the Nelchina harvestable surplus is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The “Tier I Plus” hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and drawing permit hunts.

An average of 2,600 Nelchina caribou have been harvested annually from all units by resident hunters since 2009. Nonresident hunting opportunity has not been offered since 1981.

The Nelchina herd’s population estimate was 40,500 caribou in 2013. Composition surveys conducted during October 2014 observed ratios of 42 bulls:100 cows and 45 calves:100 cows. The Nelchina harvest quota was 3,000 caribou (1,300 cows and 1,700 bulls) in 2014. As of December 1, 2014, 1,000 cows and 1,500 bulls had been reported in the harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou hunting opportunity in Unit 13 because the department retains the authority to manage the number of permits and adjust harvest quotas. There are no biological concerns associated with the proposed changes.

If adopted, the board should consider whether reasonable opportunity for success in subsistence uses of Nelchina caribou would still be provided.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 86– 5 AAC 85.025. Hunting seasons and bag limits for caribou.

PROPOSED BY: Kenneth Manning

WHAT WOULD THE PROPOSAL DO? This proposal would divide the Tier I, drawing, and CSH quotas into thirds, and allocate those quotas into three seasons (August 10–September 20, October 20–December 31, and January 1–March 31).

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three permit hunt structures.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Tier I community subsistence harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I CSH permits that may be issued annually. Although the Copper Basin CSH area includes Unit 11 and a portion of Unit 12, the caribou hunt occurs in Unit 13 only.
- There are four drawing permit hunts for caribou in Unit 13 (DC480–DC483). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of 1 caribou.
- The amount reasonably necessary for subsistence (ANS) for the Nelchina caribou herd is 600–1,000 caribou in Units 12 and 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would divide the current hunting season into one fall (August 10–September 20) and two winter seasons (October 20–December 31 and January 1–March 31). The harvest quota would be divided equally between the three seasons. With the division of the harvest quota in the proposed manner, it is anticipated that this will make reaching the harvest quota more difficult during years with large harvest quotas.

BACKGROUND: Management of the Nelchina herd depends on our ability to achieve the harvest quota in the fall when the majority of Nelchina caribou are in Unit 13. During a typical winter, very little harvest occurs in Unit 13 during the winter season because the majority of Nelchina caribou typically migrate out of the unit during October. The number of caribou harvested each year and harvest chronology are largely dependent on caribou distribution and hunter access to the herd.

The state Tier II Nelchina caribou hunt was eliminated in 2009 when the board established the current ANS of 600–1,000 caribou for the Nelchina herd and created the current hunt structures. When the Nelchina harvestable surplus is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The “Tier I Plus” hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and drawing permit hunts.

An average of 2,600 Nelchina caribou have been harvested annually by resident hunters since 2009 (Table 86-1). Nonresident hunting opportunity has not been offered since 1981.

An exception to the normal pattern of harvest chronology occurred in 2010 due to changes in regulation that affected hunting opportunity (Table 86-1). In July 2010, the Board of Game held an emergency

teleconference to address a decision on summary judgment made in a court case affecting the Unit 13 subsistence caribou hunts. The Board rescinded the community hunt (CC001) for the 2010 hunt, as well as the Unit 13 registration hunt (RC566) for the winter season. The board stipulated that those signed up for the cancelled community hunt would be allowed to participate in the registration hunt (RC566) for the fall season. The Board then established a Unit 13 Tier II hunt (TC566) for the winter season in 2010. As a consequence of the regulatory changes, only 33% of the 2010 harvest occurred during the fall season (August 10–September 20) and 67% occurred during the winter season (October 20–December 31). The increased harvest during the winter season occurred in October and early November as the herd migrated out of the unit.

While the harvest chronology in 2010 suggests that some harvest can be taken during the winter season, annual variation in weather and caribou migration make it difficult to depend on achieving a high percentage of the harvest during the winter season.

Table 86-1. Chronology of Nelchina caribou harvests, all hunts (Tier I, CSH, drawing) regulatory years 2009 through 2013.

Regulatory Year	Total Permits	Total Harvest	August 10 – September 20	October 20 – December 31	January 1 – March 31
2009	977	405	74%	16%	9%
2010 ¹	4,755	1,905	33%	67%	0%
2011	4,598	2,032	89%	11%	0%
2012	8,448	3,715	75%	18%	7%
2013 ²	12,567	2,296	100%	0%	0%

¹ RC566 (1,151 permits), season August 10–September 20; TC566 (3,604 permits), season October 21–March 31.

² No winter hunt.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity between resident hunters, but is **OPPOSED** to dividing the Nelchina harvest quota to multiple seasons. Adoption of this proposal will result in an inability to manage the Nelchina caribou herd on a sustained yield basis because reaching the harvest quotas will be difficult, particularly in years with large quotas. Management of the Nelchina herd requires achievement of the majority of the harvest quota during the fall season while caribou are still in Unit 13. The number of caribou harvested is largely dependent on caribou distribution and hunter access to the herd. Very little harvest occurs during winter seasons because caribou typically move out of the unit in October. This proposal would assign two-thirds of the annual harvest quota to seasons that occur after October 20. If this proposal is adopted the proposed hunt structure would prevent the harvest quota from being achieved in most years.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 87 – 5 AAC 92.050. Required permit hunt conditions and procedures.

PROPOSED BY: Kenneth Manning

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the restriction that limits Tier I caribou hunters in Unit 13 to hunting moose only in Unit 13.

WHAT ARE THE CURRENT REGULATIONS? Hunters registered for the Unit 13 Tier I caribou hunt are not allowed to hunt moose outside of Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department anticipates that adoption of this proposal could result in a significant increase in Tier I caribou participation. The increase in participation would likely result in a rapid harvest, and a shortened caribou season. Because Tier I caribou hunters would not be prevented from hunting moose in Unit 13, it is likely the majority of caribou hunters would still try to harvest a moose while caribou hunting in Unit 13 if the opportunity presents itself.

BACKGROUND: The Tier I registration hunt (RC566) for Nelchina Caribou is a subsistence hunt in Unit 13. Any household that applies for the hunt receives one caribou permit and must agree to the hunt condition that no one in the household can hunt moose or caribou outside Unit 13 during the same regulatory year. The hunt conditions were developed to reflect the customary and traditional patterns of caribou use in this area, including the dependence on multiple resources in this area, as published in board findings at 2011-184-BOG. Anyone who does not want to participate in the registration hunt under the permit restrictions can apply for a drawing permit.

The Tier I registration hunt (RC566) had 3,148 participating households in regulatory year 2011 (RY11). During RY12, the number of RC566 households increased 60% to 5,045, and increased again in RY13 to 6,878 households.

Drawing hunts have also been offered to Unit 13 Nelchina resident caribou hunters since RY11. A total of 1,127 drawing permits were issued in RY11, and 3,000 permits were issued in RY12. In RY13 5,000 drawing permit hunters harvested 609 caribou. Unlike the subsistence hunt, the drawing hunt permittees are allowed to hunt moose or caribou outside of Unit 13 during the same regulatory years that their Unit 13 permit is valid.

The last time an open registration hunt was held for the Nelchina herd in Unit 13 was in RY97. A total of 25,376 registration permits were issued, with a bag limit of one cow or one antlered bull with 6 or fewer tines on one side. This was in addition to 10,000 Tier II bull permits issued the same year.

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because the anticipated increase in hunter participation and harvest would likely make the hunt unmanageable. Currently 16,695 applications are received annually for Unit 13 caribou draw permits; each application costs \$5.00 for a hunting permit opportunity that is not guaranteed. If the proposal is adopted the department would anticipate that all of these hunters would sign up for a guaranteed free permit. Despite the anticipated increase in hunt participation, the department would still have emergency order authority to close the caribou hunting season to keep the harvest within the quota; however, the challenges for in-season hunt management would increase as participation increased.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 88 – 5 AAC 99.010. Boards of fisheries and game subsistence procedures.

PROPOSED BY: Kenneth Manning

WHAT WOULD THE PROPOSAL DO? This proposal recommends amending a Joint Board statewide regulation so that the amount reasonably necessary ANS annually for Unit 13 hunts for all species (moose, caribou, bears, wolves, wolverines, small game) based on individual verifiable data from each individual hunter application. The analysis would be limited to the following information:

- Years hunted, received, and eaten fish and wildlife for human food for each big game species.
- Total amount of subsistence resources acquired over each year for up to the last sixty years, including big game, small game, waterfowl, freshwater fish, saltwater fish, and trapping resources harvested.
- Number of family members and friends that shared the annual subsistence harvest over the last three years.

WHAT ARE THE CURRENT REGULATIONS? There are no regulations on how any Unit 13 ANSs are calculated. The board may consider information from the department, from other sources, and from their own expertise when making a finding of ANS. The ANS amounts found by the Board of Game to be reasonably necessary for subsistence uses of wildlife are reported in 5 AAC 99.025.

AS 16.05.258(b) states that the appropriate board shall determine whether a proportion of a fish or game stock identified can be harvested consistent with sustained yield. If a portion of a stock or population can be harvested consistent with sustained yield, that board shall determine the amount of the harvestable portion that is reasonably necessary for subsistence uses.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department would annually gather a large amount of information from individuals to report to the board for their consideration in determining the ANS based on the proposed criteria. The board could not use other information to determine ANS.

BACKGROUND: ANS is the amount that is reasonably necessary for subsistence uses. Regulations for subsistence uses must provide a reasonable opportunity for those uses, which is defined as an opportunity that allows a subsistence user to participate in a subsistence hunt that provides a normally diligent participant with reasonable expectation of success of taking game.

ANS is intended to reflect customary and traditional levels of harvests, as documented by the best available information, to provide one gauge if reasonable opportunity for subsistence uses is being provided by regulation.

Prior to the 2011 Board of Game meeting the ANS for the Nelchina caribou herd in Units 12 and 13 was the entire harvestable portion. At the 2011 Board of Game meeting the board reviewed information presented by the department on harvest patterns and history of Nelchina caribou use and reduced the ANS to 600–1,000 caribou.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it allocates hunting opportunity between residents annually based on history of resource use, and due to questions of authority.

The Board of Game may not have authority to act solely to adopt changes to regulations under the purview of the Joint Boards of Fisheries and Game. 5 AAC 99.010. *Boards of fisheries and game subsistence procedures* does not address how the individual boards adopt ANS findings.

Currently, ANS is not derived from information about the characteristics of individual hunters, but from a combination of harvest tickets, permits, and/or household survey data to establish harvest ranges over time. It is intended to reflect customary and traditional levels of harvests as documented by the best available information. Much of the information that the proposed ANS determination would be based on is not verifiable in databases collected by resource agencies. The non-verifiable data includes information on the harvests of small game, waterfowl, non-salmon fish, and many species of saltwater fish; and the number of family members and friends that the harvest was shared with.

Alaska statutes and the Joint Boards of Fisheries and Game have delegated the responsibility of assigning an ANS for subsistence uses of caribou to the Board of Game. If this proposal is adopted the department assumes that all collected harvest information will be reviewed annually by the board at a board work session or special meeting.

COST ANALYSIS: Adoption of this proposal is expected to result in significant costs to the department in salaries and staff time to collect the extensive fisheries and wildlife data from all Alaskans who currently hunt and fish in Unit 13, and their family and friends, and all Alaskans who have hunted and fished in the unit for the past 60 years; analyze and report the data; arrange for special or additional meetings and Fish and Game Advisory Committee participation in special or additional meetings; and administer the hunts.

PROPOSAL 89 – 5 AAC 99.070. Tier II subsistence hunting permit points system.

Note: The regulatory citation to 5 AAC 99.070, appears to be a typo since there is no such regulation. Instead this staff analysis is provided as if the regulatory citation is 5 AAC 92.070. Tier II subsistence hunting permit point system.

PROPOSED BY: Kenneth Manning

WHAT WOULD THE PROPOSAL DO? This proposal would modify statewide Tier II scoring procedures by changing them for all Unit 13 Tier II subsistence hunt applicants. The score of each Unit 13 Tier II hunt applicant would be based on the following information:

- Years hunted, received, and eaten fish and wildlife for human food for each big game species.
- Total amount of subsistence resources acquired over each year for up to the last sixty years, including big game, small game, waterfowl, freshwater fish, saltwater fish, and trapping resources harvested.
- Number of family members and friends that shared the annual subsistence harvest over the last three years.

WHAT ARE THE CURRENT REGULATIONS? 5 AAC 92.070 specifies the five criteria used to score applicants for Tier II hunts; there are no exceptions for Unit 13 hunts.

Under AS 16.05.258(b)(4)(B), when a reasonable opportunity for subsistence uses cannot be provided, those eligible to participate are determined based on scores that measure “the customary and direct dependence on the fish stock or game population by the subsistence user for human consumption as a mainstay of livelihood” and “the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated.”

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposed evaluation criteria for eligibility in Unit 13 Tier II hunts would be amended into the current statewide criteria found in 5 AAC 92.070.

BACKGROUND:

Under AS 16.05.258(b)(4)(B), when a reasonable opportunity for subsistence uses cannot be provided, individual eligibility is determined based on “the customary and direct dependence on the fish stock or game population by the subsistence user for human consumption as a mainstay of livelihood” and “the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated.” The intent of this proposal appears to be to eliminate the portion of 5 AAC 92.070 (the Tier II point system) that measures the second criteria, at 5 AAC 92.070(b) “the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated.” In *State v. Manning* (Alaska 2007) the Alaska Supreme Court held that the questions used to score Tier II hunt applicants regarding “the ability to obtain food” did not violate the Supreme Court’s ruling against residency-based criteria and thus questions about where hunt applicants obtain food and gas in the regulation did not violate the Alaska Constitution. AS 16.05.258(b)(4)(B) requires that both factors be measured as part of the Tier II process.

DEPARTMENT COMMENTS: The department is Neutral to the proposed changes to the statewide criteria through which hunting opportunity is allocated during Unit 13 Tier II hunts.

COST ANALYSIS:

Adoption of this proposal is expected to result in significant costs to the department in salaries and staff time to collect the extensive fisheries and wildlife data from all Alaskans who currently hunt and fish in Unit 13, and their family and friends, and all Alaskans who have hunted and fished in the unit for the past 60 years; to analyze and report the data; and to incorporate the data into the Tier II permit scoring system. The Board of Game would need to provide regulatory direction on the point values given to the new data.

PROPOSAL 90 – 5 AAC 85.040. Hunting seasons and bag limits for goat.

PROPOSED BY: Clint Mayeur

WHAT WOULD THE PROPOSAL DO? This proposal seeks to convert the Unit 13D goat drawing hunt (DG720) to a registration hunt.

WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters can take one goat by registration permit (RG580) from September 1–November 30 in the portion of 13D that is south of the Tiekel River and east of a line beginning at the confluence of the Tiekel and Tsina rivers.
- Resident hunters can take one goat by drawing permit (DG720) from August 10–September 20 in the remainder of Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal converts the drawing goat hunt in the remainder of 13D to a registration goat hunt. If the proposal is adopted goat hunting opportunity would be provided to everyone that registers for the hunt.

BACKGROUND: Due to infrequent or incomplete surveys, poor survey conditions, and challenges associated with conducting aerial wildlife surveys in montane habitats, it has been difficult to estimate the goat population for the central Chugach Mountains. An absence of consistent and comprehensive survey data makes detecting significant population trends difficult. However, the information available suggests that the goat population in Subunit 13D remains small and stable.

While carnivore predation on goats undoubtedly occurs, it is suspected that the mountain goat populations in Unit 13 are regulated primarily by winter weather. Goat population declines have been documented in Unit 13 following deep snowfalls.

Starting in 2011 drawing hunts DG718 and DG719 were combined to make a single drawing hunt, DG720. The majority of goat hunting in Subunit 13D occurs during the drawing hunt from August 10–September 20. Additional hunting occurs in a small portion of Subunit 13D in registration hunt (RG580) September 1–November 30.

Table 90-1. Hunt statistics for the Unit 13D drawing goat permit (DG720) and harvest, regulatory years 2009–2013.

Regulatory Year	Applicants	Permits	Hunted	Harvest
2009 ^a	372	35	16	8
2010 ^a	506	35	11	2
2011	573	35	14	8
2012	474	35	15	3
2013	492	50	22	10

^a The current hunt area for DG720 was managed as two separate drawing hunts (DG718 and DG719) prior to 2011.

DEPARTMENT COMMENTS: The department is **OPPOSED** to an unlimited registration hunt based on the current number of applicants applying for the drawing goat hunt in Unit 13D. The department does not have the ability to set an annual harvest quota for goats in this area due to the size of the area, weather conditions encountered, and staff time and budget constraints.

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department to obtain the population data required to set annual harvest quotas.

PROPOSAL 91– 5 AAC 85.040. Hunting seasons and bag limits for goat.

PROPOSED BY: Aaron Bloomquist

WHAT WOULD THE PROPOSAL DO? This proposal seeks to add the Unit 13D drawing hunt (DG720) to the Unit 11 and 13 registration hunt (RG580) and align all seasons with the current registration hunt.

WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters can take one goat by registration permit (RG580) from September 1 –November 30 in Unit 11 and the portion of Unit 13D that is south of the Tiekel River and east of a line beginning at the confluence of the Tiekel and Tsina rivers.
- Resident hunters can take one goat by drawing permit (DG720) from August 10–September 20 in the remainder of Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal converts the drawing goat hunt in the remainder of Unit 13D to a registration goat hunt and aligns the season to match the RG580 season dates. If the proposal is adopted goat hunting opportunity would be provided to everyone that registers for the hunt.

BACKGROUND: Due to infrequent or incomplete surveys, poor survey conditions, and challenges associated with conducting aerial wildlife surveys in montane habitats, it has been difficult to estimate the goat population for the central Chugach Mountains. An absence of consistent and comprehensive survey data makes detecting significant population trends difficult. However, the information available suggests that the goat population in Subunit 13D remains small and stable.

While carnivore predation on goats undoubtedly occurs, it is suspected that the mountain goat populations in Unit 13 are regulated primarily by winter weather. Goat population declines have been documented in Unit 13 following deep snowfalls.

Starting in 2011 drawing hunts DG718 and DG719 were combined to make a single drawing hunt, DG720. The majority of goat hunting in Subunit 13D occurs during the drawing hunt from August 10–September 20. Additional hunting occurs in a small portion of Subunit 13D in registration hunt (RG580) September 1–November 30.

Table 91-1. Hunt statistics for the Unit 13D drawing goat permit (DG720) and harvest, regulatory years 2009–2013.

Regulatory Year	Applicants	Permits	Hunted	Harvest
2009 ^a	372	35	16	8
2010 ^a	506	35	11	2
2011	573	35	14	8
2012	474	35	15	3
2013	492	50	22	10

^a The current hunt area for DG720 was managed as two separate drawing hunts (DG718 and DG719) prior to 2011.

DEPARTMENT COMMENTS: The department is **OPPOSED** to an unlimited registration hunt based on the current number of applicants applying for the drawing goat hunt in Unit 13D. The department does not have the ability to set an annual harvest quota for goats in this area due to the size of the area, weather conditions encountered, staff time, and budget constraints. If the proposal is adopted, the department

recommends that the board allows the department to use its discretion in establishing separate permit hunts with separate harvest quotas to distribute harvest in a more sustainable manner.

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department to obtain the population data required to set annual harvest quotas.

PROPOSAL 92 – 5 AAC 85.040. Hunting seasons and bag limits for goat.

PROPOSED BY: Randy Anderson

WHAT WOULD THE PROPOSAL DO? This proposal extends the drawing permit goat hunt (DG720) from August 10–September 20 to August 10– November 30, thereby aligning the Unit 13 drawing goat hunt (DG720) with other hunts in Units 11 and 13 (RG580).

WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters can take one goat by registration permit (RG580) from September 1 –November 30 in the portion of Unit 13D that is south of the Tiekel River and east of a line beginning at the confluence of the Tiekel and Tsina rivers.
- Resident hunters can take one goat by drawing permit (DG720) from August 10–September 20 in the remainder of Unit 13D.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would lengthen the season of the Unit 13 drawing goat hunt (DG720) by aligning the season with the Unit 11 and 13 registration hunt (RG580). The longer season may provide additional opportunity for successful draw permit hunters to harvest a goat.

BACKGROUND: Due to infrequent or incomplete surveys, poor survey conditions, and challenges associated with conducting aerial wildlife surveys in montane habitats, it has been difficult to estimate the goat population for the central Chugach Mountains. An absence of consistent and comprehensive survey data makes detecting significant population trends difficult. However, the information available suggests that the goat population in Subunit 13D remains small and stable.

While carnivore predation on goats undoubtedly occurs, it is suspected that the mountain goat populations in Unit 13 are regulated primarily by winter weather. Goat population declines have been documented in Unit 13 following deep snowfalls.

Starting in 2011 drawing hunts DG718 and DG719 were combined to make a single drawing hunt, DG720. The majority of goat hunting in Subunit 13D occurs during the drawing hunt from August 10–September 20. Additional hunting occurs in a small portion of Subunit 13D in registration hunt (RG580) September 1–November 30.

Table 92-1. Hunt statistics for the Unit 13D drawing goat permit (DG720) and harvest, regulatory years 2009–2013.

Regulatory Year	Applicants	Permits	Hunted	Harvest
2009 ^a	372	35	16	8

2010 ^a	506	35	11	2
2011	573	35	14	8
2012	474	35	15	3
2013	492	50	22	10

^a The current hunt area for DG720 was managed as two separate drawing hunts (DG718 and DG719) prior to 2011.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the population can be managed sustainably with either season, provided the department retains its authority to manage the number of permits issued. In addition, the department can use its emergency order authority to close the hunt if the harvest exceeds what can be reasonably sustained based on the most current information available.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 93 – 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

PROPOSED BY: Aaron Bloomquist

WHAT WOULD THE PROPOSAL DO? This proposal allows brown bears to be taken over bait in Units 11 and 13.

WHAT ARE THE CURRENT REGULATIONS?

- Hunters can take 1 brown bear every regulatory year in Unit 11 and in Denali State Park in Unit 13E from August 10–June 15.
- Hunters can take 1 brown bear every regulatory year in the remainder of Unit 13 with no closed season.
- Brown bear hunters may also bait brown bears in Unit 13D from April 15–June 30.
- Resident locking tags are not required to hunt brown bears in Unit 11 and Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This expands brown bear baiting opportunity to Unit 11 and all of Unit 13. Currently brown bear can be taken over bait only in Unit 13D.

BACKGROUND: The brown bear population in Unit 13 is well above the management objective of 350 bears. Brown bear harvests in Unit 13 have been relatively stable since the mid 1990s, ranging from 117 to 174, with an average of 136 (61% male) over the last 5 regulatory years (regulatory years 2009–2013, Table 93-1). We would expect an initial increase in brown bear harvest during the first few years if baiting is allowed before harvests stabilize again in succeeding years.

The bear population in Unit 11 has not been surveyed, but observations by department staff and the public indicate that the population is well-distributed throughout the unit and abundant. Harvest density is generally low and not believed to be a factor influencing bear numbers.

Bear baiting activity in Unit 13 has increased over the past 10 years from 111 registered bait stations in 2004 to 190 in 2013 (Table 93-2). Starting in regulatory year 2013 hunters were able to harvest brown bears over black bear bait stations in Unit 13D. Twenty-six of the thirty-two brown bears harvested during the spring in Unit 13D were harvested over bait (Table 93-3).

Table 93-1. Number of brown bears harvested in Units 11 and 13, regulatory years 2004 through 2013.

	Unit 11	Unit 13A	Unit 13B	Unit 13C	Unit 13D	Unit 13E	Unit 13 Total
2004	24	20	13	19	64	24	164
2005	23	19	9	28	54	17	150
2006	27	26	8	16	51	13	141
2007	36	21	4	20	68	15	164
2008	29	27	11	22	66	17	172
2009	23	25	12	23	51	26	160
2010	34	18	2	27	56	18	155
2011	19	18	5	21	56	15	134
2012	24	20	12	25	48	20	149
2013	28	22	8	55	46	15	174
<i>Average</i>	<i>26.7</i>	<i>21.6</i>	<i>8.4</i>	<i>25.6</i>	<i>56.0</i>	<i>18.0</i>	<i>156.3</i>

Table 93-2. Number of registered bear baiting stations in Units 11 and 13, regulatory years 2004 through 2013.

	Unit 11	Unit 13A	Unit 13B	Unit 13C	Unit 13D	Unit 13E	Unit 13 Total
2004	2	10	2	8	54	37	111
2005	7	7	5	7	37	36	92
2006	13	8	0	4	47	18	77
2007	17	9	1	5	70	21	106
2008	14	17	2	3	58	29	109
2009	14	20	3	7	83	28	141
2010	11	14	1	6	62	31	114
2011	16	22	3	4	95	29	153
2012	6	11	1	4	107	30	153
2013	6	17	1	8	139	25	190
<i>Average</i>	<i>10.6</i>	<i>13.5</i>	<i>1.9</i>	<i>5.6</i>	<i>75.2</i>	<i>28.4</i>	<i>124.6</i>

Table 93-3. Chronology of brown bear harvest in Unit 13D, regulatory years 2009 through 2013.

	Fall	Spring	Total
2009	18	5	23
2010	16	11	27
2011	11	10	21
2012	13	12	25
2013 ^a	23	32	55

^aFirst year of spring brown bear take over bait, 26 brown bears taken over bait

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it has not identified a biological concern for the brown bear populations in Units 11 and 13. Adoption of this proposal is expected to increase brown bear harvest and may lead to localized depletions of the bear population in accessible areas.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 94 – 5 AAC 85.015. Hunting seasons and bag limits for black bear, and 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

PROPOSED BY: Mat-Valley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal creates a fall black and brown bear baiting season in Unit 13D with an August 25–October 15 season.

WHAT ARE THE CURRENT REGULATIONS?

- Hunters can take 1 brown bear every regulatory year in Denali State Park in Unit 13E from August 10–June 15.
- Hunters can take 1 brown bear every regulatory year in the remainder of Unit 13 with no closed season.
- Brown bear hunters may also bait brown bears in Unit 13D from April 15–June 30.
- Resident locking tags are not required to hunt brown bears in Unit 13.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This expands brown bear baiting opportunity in Unit 13D to include a fall baiting season.

BACKGROUND: The department does not have an estimate for the brown bear population in Unit 13D. Brown bear harvest increased significantly when hunters were allowed to harvest brown bears over black bear bait stations during the spring of 2013, but the effects of this increased harvest on the brown bear population are unknown. Twenty-six of the thirty-two brown bears taken during the spring in Unit 13D were harvested over bait (Table 94-1).

Table 94-1. Chronology of brown bear harvest in Unit 13D, regulatory years 2009 through 2013.

	Fall	Spring	Total
2009	18	5	23
2010	16	11	27
2011	11	10	21
2012	13	12	25
2013 ¹	23	32	55

¹First year of spring brown bear take over bait, 26 brown bears taken over bait

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the department has not identified any biological concerns for the bear populations in subunit 13D; however, the department also has no reliable method to monitor the bear population. The effect of adding a fall bear baiting season in this area is unknown. Given the increase in brown bear harvest in the spring of 2013, when brown bear baiting was first authorized in this area, it may be advisable to see what the potential for brown bear harvest over bait will be with the spring season.

Similar to other proposals to liberalize bear harvests by increasing bear baiting opportunity, there is no way to anticipate the amount of interest in these opportunities or the increase in harvests that would occur if the proposal is adopted.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 95 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

PROPOSED BY: Paxson Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal reduces the bag limit for ptarmigan in Unit 13B from 10 per day, 20 in possession to five ptarmigan per day, 10 in possession. The proposal also lengthens the season from August 10–November 30 to August 20–March 31, and adds a no-hunting corridor within 2.5 miles of both sides of the Denali and Richardson highways along their length in Unit 13B (approx. 165 miles) from January 1–March 31.

WHAT ARE THE CURRENT REGULATIONS? Ptarmigan hunting season in Unit 13B is open from 10 August to 30 November. The daily bag limit is 10 ptarmigan per day, 20 in possession for the duration of the season.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Although the bag limit would be reduced by half, ptarmigan hunters would have four additional months in which to hunt ptarmigan in Unit 13B. In order to participate, ptarmigan hunters would need to use either snowshoes or a snowmachine between 1 January and 31 March in order to access areas open to hunting 2.5 miles distant from the Denali or Richardson highways. Harvests would increase on willow, rock, and white-tailed ptarmigan populations in Unit 13B. Hunting pressure would increase on ptarmigan populations more distant from the roadway between January 1 and March 31 that traditionally have minimal harvest pressure due to the 2.5 mile corridor around the Denali and Richardson highways.

BACKGROUND: During the spring of 2008, zero male rock ptarmigan were observed along 3 survey locations in Unit 13B. Male willow ptarmigan were also at low density (3–5/mi²) in Unit 13B. During the winter of 2009, the department recommended that the board close the ptarmigan season after November 30 in Unit 13B. The board supported the recommendation and created a season closure date of November 30 for Unit 13B.

Willow and rock ptarmigan abundance surveys in Unit 13B have documented a steady increase in abundance since spring 2010. In adjacent Unit 13E (where the season closes on 31 March) abundance surveys have documented a stable yet low density population since surveys began in 2002. Willow ptarmigan densities range between 4–13 males/mi² in Unit 13B versus 1–3 males/mi² in Unit 13E.

Proposal 88 was heard during the February 2013 Board of Game meeting in Wasilla and asked to restore the season from August 10–November 30 to August 20– March 31. The proposal failed and the regulations remained unchanged.

No evaluation of rock ptarmigan mortality or movement has ever been completed in Unit 13. Therefore, in May 2013, the department began a study of Unit 13B rock ptarmigan to better evaluate those traits at road accessible and road inaccessible locations through the use of radio collars. Based on data collected to date, the majority of radio collared rock ptarmigan in Unit 13B have not exhibited large movements (average >10 km² annually). However, annual mortality has been high (2013 at 90%; 2014 at 40% through October 2014) due to predation and human harvest.

Based on the 2013-14 statewide small game hunter survey results, Unit 13 ptarmigan harvest is largely bimodal with the largest harvest occurring in the winter due to increased access on snowmachine. Based on voluntary wing collections from hunters, an average of 14% of the annual harvest in all of Unit 13 occurs from August through October. However, 85% occurs from February through March (predominantly from Unit 13E and 13A; Unit 13B is closed during this period). This differs from the statewide average of 54% between August and October and 43% between February and March. Less than 3% occurs from the end of October through mid-February likely due to the low temperatures, darkness, and poor snow conditions.

Through the voluntary statewide wing collection program the department has received an average of 210 willow and rock ptarmigan wings from Unit 13 annually from which juvenile versus adult proportions can be estimated. Annually, the proportion of juveniles outnumbers the proportion of adults between August and October which is expected. However, the proportion of adults exceeds that of juveniles in February and March suggesting the potential of additive mortality on breeding birds immediately prior to the breeding season.

All three species of ptarmigan are highly vulnerable to brief stochastic weather events in the spring and summer that can have a significant effect on juvenile recruitment. A one day snow event (4-18") on June 18, 2014, throughout the Alaska Range and Southcentral Alaska, caused high nest abandonment and mortality rates (adults and chicks).

There is a positive customary and traditional use finding for ptarmigan in Unit 13; the board has not made a finding of amounts reasonably necessary for subsistence. The board should determine if adoption of this proposal continues to provide reasonable opportunity for subsistence uses of ptarmigan in Unit 13.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. There is not a conservation issue relative to rock and willow ptarmigan abundance in Unit 13B or all of Unit 13.

Reducing the daily bag limit would reduce overall harvest slightly. Hunter harvest averages fewer than 5 ptarmigan per day. However wintertime, particularly snowmachine hunters, tend to be more effective at reaching their daily limit.

By changing the season closure date to March 31 the department would not be able to study the effects of winter harvest and the possibility of additive mortality using differential season closure dates in adjacent subunits. Much has been learned about ptarmigan movement and mortality over the last 1-2 years in Units 13B and 13E and planning is underway to continue to expand upon that knowledge. In addition, by increasing harvest potential throughout Unit 13B after November 30, hunters will have increased opportunity with a longer season but will likely see reduced ptarmigan harvest over time.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to the department.

PROPOSAL 96 – 5 AAC 85.045 Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts must be re-authorized annually by the Board to comply with statutory requirements.

WHAT ARE THE CURRENT REGULATIONS?

- The department is allowed to issue up to 1,000 drawing permits to resident hunters in Unit 14A with a bag limit of one antlerless moose. The season is August 20–September 25 for DM400–DM412 and November 1–December 25 for DM413.
- The department may also issue up to 200 permits to resident hunters for the targeted hunt in Unit 14A with a bag limit of one moose during a winter season to be announced by emergency order.
- The department may also issue up to 100 additional permits to resident hunters for a targeted hunt in Unit 14B with a bag limit of one moose during a winter season to be announced by emergency order.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes the antlerless moose hunts in Units 14A and 14B; these hunts are needed to keep the moose population within management objectives and provide additional hunting opportunity for residents. The targeted hunt also provides managers with a tool to reduce moose-vehicle collisions and address nuisance moose issues.

BACKGROUND: Moose surveys conducted in November 2013 resulted in an estimate of 8,500 moose in Unit 14A. This estimate is greater than both the 2011 estimate of 8,000 moose and the population objective of 6,000–6,500 moose. The bull ratio is 21 bulls:100 cows and the calf ratio is 45 calves:100 cows.

Based on current projections, the Unit 14A moose population is expected to grow and continue to exceed population objectives. If the density of moose is allowed to increase, we anticipate an increase in the number of moose-human conflicts, and moose may experience nutritional stress, particularly during severe winters.

The targeted moose hunt in Units 14A and 14B provide an additional tool to address public safety concerns related to moose-vehicle collision and nuisance management issues.

Moose-vehicle collisions result in property damage and may result in human injury or death. An average of 266 moose per year were killed in the Mat-Su Valley area during the last few years of average snowfall and substantially more were killed during higher snowfall years. The department also receives periodic complaints from the public about crop depredation and aggressive behavior that can be mitigated by this hunt structure.

The Department uses the targeted hunts to mitigate public safety concerns by issuing permits to selected hunters and assigning them to hunt areas that correspond with areas of high moose-vehicle collisions or reoccurring nuisance issues.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. Cow harvests are warranted to control the moose population's growth and reduce moose-human conflicts in the Mat-Su Valley. These hunts also provide additional moose hunting opportunity in the Mat-Su Valley.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 97 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a resident, late season archery hunt for moose in Units 14A and 14B.

PROPOSED BY: Jeff Warner

WHAT WOULD THE PROPOSAL DO? This proposal establishes a 10-day resident only archery season for one bull moose with spike-fork antlers, or 50-inch antlers, or antlers with three or more brow tines in Units 14A and 14B. The new hunt would have a season of October 1–10, starting 5 days after the current firearm season closes.

WHAT ARE THE CURRENT REGULATIONS?

- The current archery season in Unit 14A and 14B is August 10–17 with a bag limit of one bull moose with spike-fork antlers, or 50-inch antlers, or 3 or more brow tines.
- The general season hunting opportunity occurs from August 25–September 25 with a bag limit of one bull moose with spike-fork antlers, or 50-inch antlers, or 3 or more brow tines.
- Presently, there is no late season resident archery hunt for moose in Units 14A and 14B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A late-season archery only hunt for bull moose would provide an additional opportunity for resident bow hunters to harvest a moose outside existing moose hunting seasons. The proposed hunting season would overlap the peak of the fall rut when bull moose are more vulnerable to harvest, which could increase hunter success and harvest.

BACKGROUND: The August 10–17 season for archery hunters to hunt moose in Unit 14A was implemented in 1995. Proposals to change the season dates were submitted in 1997, 1999, 2001, 2007 and 2009, but were not adopted by the board. The average harvest during the archery season was 36 in Unit 14A and 2 in Unit 14B during the past 5 years (regulatory years 2009–2013).

The bull ratios observed were 21 bulls: 100 cows in Unit 14A and 27 bulls: 100 cows in Unit 14B during fall 2013 surveys. The bull:cow objective for these units is 20–25 bulls:100 cows.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to archery hunters, but **OPPOSES** any increases in the bull harvest in Unit 14A due to the low bull ratios compared to objectives.

If the proposal is adopted, this hunt would take place during the peak portion of the rut. Bull moose become easier to harvest during the rut, and an increase in the total harvest can be expected.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 98 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: James Weise

WHAT WOULD THE PROPOSAL DO? This proposal creates a 10-day archery season for one bull moose with spike-fork antlers, or 50-inch antlers, or antlers with three or more brow tines in Units 16A and 16B. The new archery season would start 5 days after the close of the general season with a season of October 1–10.

WHAT ARE THE CURRENT REGULATIONS?

- The current archery season in Unit 16A is August 10–17 with a bag limit of one bull moose with spike-fork antlers, or 50-inch antlers, or 3 or more brow tines. There is no archery-only season in Unit 16B.
- The general season hunting opportunity in Units 16A and 16B occurs from August 20–September 25 with a bag limit of one bull moose with spike-fork antlers, or 50-inch antlers, or 3 or more brow tines.
- In addition to the general season hunts in Unit 16B, there are also Tier II hunts (TM565–569), a youth hunt (DM541), and a drawing permit (DM540) hunt on the mainland, and a registration moose hunt on Kalgin Island (RM572).
- Presently, there are no late season archery hunts for moose in Units 16A and 16B.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A late-season archery only hunt for bull moose would provide an additional opportunity for resident bow hunters to harvest a moose. The proposed hunting season would overlap the peak of the fall rut when bull moose are more vulnerable to harvest, which could increase hunter success and harvest.

BACKGROUND: Moose hunting regulations in Unit 16A have remained the same, while regulations in Unit 16B have been liberalized over the last few years.

Unit 16A is within the Anchorage–Mat-Su–Kenai Peninsula Nonsubsistence Area. The bull:cow ratio in Unit 16A was estimated to be 25 bulls:100 cows in 2009; however, the population size (2,574 moose) was below the management objective of 3,500–4,000. Hunters harvested an average of 122 moose in Unit 16A during the last 3 hunting seasons (regulatory years 2011–2013). Two moose were harvested during the archery season in 2009, 1 in 2010, and 2 in 2013.

In Unit 16B, moose hunting opportunity was limited to only a Tier II hunt structure during regulatory years 2001, 2002, and 2006–2008. In addition to the Tier II hunt, a general season hunt was offered during regulatory years 2009 and 2010. A nonresident moose season (SF50 or 3 brow tines) was added in 2011, and 2 additional resident drawing permit hunts for any bull were implemented during the 2014

regulatory year. The new drawing hunts include DM540, which is for residents only and restricted to 16B south of the Skwentna River, and DM541, which is for resident youth ages 10 through 17.

Hunters harvested an average of 220 moose in Unit 16B during the last 3 hunting seasons (regulatory years 2011–2013).

During the last surveys conducted in Unit 16B in 2008, 2011 and 2010 (for 16B North, Middle, and South), the bull:cow ratios averaged 51 bulls:100 cows. Survey results also suggested that the moose populations in Unit 16B Middle and South were above the population size management objective for each subarea (3,120–3,600 moose and 1,560–1,800 moose, respectively), while the population in 16B North was below objective (1,820–2,100 moose).

The board has made positive customary and traditional use findings, and amounts reasonably necessary for subsistence, for several populations of moose in Unit 16B, as follows:

- Unit 16B, that portion north of the Beluga River (“16B North”): 160–180 moose.
- Unit 16B, that portion south of the Beluga River and north of Redoubt Bay (16B “Middle”): 29–37 moose.
- Unit 16B Redoubt Bay drainages (16B “South”): 10 moose.
- Unit 16B Kalgin Island: 2 moose.
- In addition, there are board findings addressing the subsistence uses of moose in Unit 16B, two of which recognize the importance of Unit 16B moose to subsistence users: 97-109-BOG and 93-70-BOG.

Table 98-1. Results of most recent fall moose surveys in Unit 16.

Survey Area	Year Last Surveyed	Population Size	Bulls: 100 Cows	Calves: 100 Cows
Unit 16A	2009	2,574	25	30
Unit 16B – North	2008	840	60	11
Unit 16B – Middle	2011	3,460	46	24
Unit 16B – South	2010	2,370	52	18

During recent years, the department has not been able to conduct surveys in Unit 16 due to the lack of adequate snow cover during the survey period.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to certified bow hunters. The department anticipates that the majority of hunting activity will occur in Units 16A and 16B-North where the moose populations were below management objectives during the last surveys. Due to the lack of recent survey information and recent liberalizations of hunting opportunity in Unit 16B, further liberalization of moose hunting opportunity may not be advisable until the effects of the current seasons can be quantified. If the proposal is adopted, this hunt would take place during the peak of rut when bulls are more easily harvested, and an increase in the success rate of archery hunters can be expected.

There is a positive customary and traditional use finding for moose in Unit 16. In the past, the board has found that reasonable opportunity for subsistence exists during the autumn hunting period. The board has also determined that a Tier II hunt is necessary to provide for subsistence uses of moose during the winter when moose migrate from surrounding areas to riparian areas along the major rivers. The board should

consider if adoption of this proposal continues to provide reasonable opportunity for each population of moose in Unit 16B for which there is a positive customary and traditional use finding.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 99 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal reauthorizes the antlerless moose hunts on Kalgin Island in Unit 16B.

WHAT ARE THE CURRENT REGULATIONS? Resident and nonresident hunters with registration permit RM572 are allowed to harvest 1 moose on Kalgin Island in Unit 16B. The hunting season is open from August 20–September 20.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal reauthorizes the antlerless moose hunts in Unit 16B that must be re-authorized annually by the Board to comply with statutory requirements.

The "any moose" registration hunt provides additional mortality on this predator-free island population to reduce the moose population below carrying capacity thereby preventing the degradation of habitat leading to starvation. The difficult hunting conditions and limited access will minimize the danger of over-harvest.

BACKGROUND: Moose were introduced to Kalgin Island in the late 1950s to provide for additional hunting opportunities. By 1981, the population was over 140 moose due to an absence of predators. In response to concerns of over-population and deteriorating habitat conditions, a drawing permit hunt for cows was initiated in 1995. In an attempt to reduce the population quickly, the board established a registration hunt for any moose for the fall 1999 season. During the fall 2012 survey, 104 moose were observed on Kalgin Island, which was above the objective of 20–40 moose. Since 2000, the population has been over objective in 7 of 8 surveys.

The board has made a positive customary and traditional use finding for 16B Kalgin island moose, and found that 2 moose are reasonably necessary for subsistence.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. The "any moose" hunt provides a necessary tool to manage the moose population on this predator-free island, and the difficult hunting conditions and limited access minimize the danger of over-harvest.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 100 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

PROPOSED BY: Austin Bulawa

WHAT WOULD THE PROPOSAL DO? This proposal creates a brown bear baiting season to take one brown bear every regulatory year in Unit 14B with the same salvage requirements as black bears.

WHAT ARE THE CURRENT REGULATIONS? The hunting season for brown bears is August 10–May 31 with a bag limit of 1 bear every regulatory year. The hide and skull of brown bears taken in Unit 14B must be salvaged and sealing is required. Brown bear hunting over bait has not been authorized in this unit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal allows brown bears to be taken over bait in Unit 14B, and successful hunters would have to follow the same salvage requirements as black bears. The proposal does not recommend season dates for brown bear baiting; however, the black bear baiting season in Unit 14B is April 15–June 30.

If this proposal is adopted, the department would have no information on the bears harvested because there are no harvest tickets for brown bears, and it is assumed that sealing requirements would be removed if the salvage of the hide and skull is not required. There are no sealing requirements for black bears in Unit 14B. For black bears taken in GMU 14A from January 1 – May 31 only the meat is required to be salvaged, and for black bears taken in GMU 14A from June 1 – December 31 either the meat or the hide must be salvaged. Brown bear harvest would likely increase if this proposal is adopted.

BACKGROUND: Brown bear harvests have averaged 15 bears during the last 5 years (2009–2013) and have increased at a rate of 0.7 bears per year since 1990. Non-hunting harvest (Defense of Life and Property and vehicle collisions) averaged 2.2 bears annually between 2009 and 2013.

The moose population in Unit 14B appears to be stable or increasing and is currently within the management objective of 2,500–2,800 moose. During the last population survey in 2013, the observed moose composition ratios were 30 bulls:100 cows and 28 calves:100 cows.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because the department has not identified any biological concerns for the brown bear population in Unit 14B; however the department is **OPPOSED** to removing the requirements to salvage the hide and skull of brown bears harvested and to removing the sealing requirements.

The proposal suggests that authorizing brown bear baiting in Unit 14B would benefit the moose population. The department does not have sufficient information to assess how important predation is in limiting moose population in Unit 14B; however, given the number of black bears in the Unit, it is unlikely that the proposed regulation would benefit the moose population.

This proposal may increase bear baiting activity near developed areas along the road system, but it is not expected to greatly increase brown bear harvest and it is uncertain how much of an effect it will have on reducing bear-human conflicts in the area.

Harvest, the number of DLPs, and nuisance bear calls do not show an increasing trend.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 101 – 5 AAC 92.108. Identified big game prey populations and objectives; and 92.122. Intensive Management Plan VI.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal provides new regulatory language for the Unit 16 predation control program and extends the authorization period to June 30, 2021.

WHAT ARE THE CURRENT REGULATIONS? Under the Unit 16 Intensive Management (IM) program, the department is authorized to reduce black bears, brown bears, and wolves by issuing snaring, baiting, and control permits for black and brown bears and issuing aerial wolf control permits to the public. Control efforts are designed to meet population and harvest objectives for moose. The current regulation governing the Unit 16 predation control activities are scheduled to expire on July 1, 2017.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The proposed regulatory language does not alter the current IM program in Unit 16. To conform to the department's current IM protocol, which was approved by the board, this proposal introduces new regulatory language for 5AAC 92.122 to reduce its length, while leaving the program unaffected. The department will also present the new Intensive Management Operational Plan for the Unit 16 Predation Control Area.

BACKGROUND: The department recently developed a new protocol for IM programs designed to enhance our ability to review, evaluate, and modify IM programs. The IM protocol includes standardized feasibility assessments, operational plans, and codified regulations. All IM programs are being updated to reflect this new protocol.

The Unit 16 IM program was first authorized by the Board of Game in 2003. Wolf control began in 2004. Black bear baiting was liberalized and the control program began in 2007. Snaring for black bears was implemented in 2009 within the control area followed by the establishment of a Brown Bear Control Area in Unit 16B South; snaring was also allowed in this area in 2011.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. The proposal complies with statutory obligations as well as the department's protocol for IM programs. The department's operational plan is presented for feedback on implementation of the IM program.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 102 – 5 AAC 85.015. Hunting season and bag limits for black bear, and 85.020. Hunting seasons and bag limits for brown bear.

PROPOSED BY: Mat-Valley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal establishes a fall season for taking brown and black bears over bait in all of Unit 16 outside Denali State Park from August 25–October 15.

WHAT ARE THE CURRENT REGULATIONS?

- Resident and nonresident hunters are allowed to take brown and black bears over bait from April 15–June 30 in all of Unit 16. Hunters are also authorized to take black bears over bait from July 1–October 15 in the Unit 16 control area; however, brown bears may not be taken over bait during the July 1–October 15 season.
 - Resident and nonresident hunters are allowed to register up to 2 bait stations
 - Guides may register up to 10 bait stations per guide use area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal expands the existing fall black bear baiting season to all of Unit 16 with the exception of Denali State Park, and establishes a fall brown bear baiting season in the same area. The proposed regulation is expected to increase bear harvest, particularly brown bear harvest by nonresident hunters.

BACKGROUND: In response to a decrease in the moose population in Unit 16B, the brown bear bag limit was increased from 1 bear every 4 years to 1 brown bear per year in 2001 and to 2 bears per year in 2005. The bag limit in Unit 16A was increased from 1 bear every 4 years to 1 bear every year in 2005. The seasons for almost all of Unit 16 have also been gradually increased over the last few years and are now at no closed season (there is still a shorter season around Wolverine Creek). The 5-year average annual brown bear harvest for 2009 thru 2013 was 20 bears in Unit 16A and 101 bears in 16B. Two bears were taken in Defense of Life and Property in 16A during this period and 7 in Unit 16B.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposal because it has not identified any biological concerns for black or brown bears in Unit 16. Efforts to reduce the bear population in Unit 16B and improve moose calf survival by liberalizing bear hunting regulations have not been successful to date.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 103 – 5 AAC 92.530. Management areas.

PROPOSED BY: Mat-Valley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal creates the Hatcher’s Pass Youth Hunt Management Area.

Proposed Hatcher’s Pass Youth Management Area:

- (A) the area consists of that portion of Unit 14A within the upper Little Susitna River drainage upstream of mile 13.6 on Hatcher Pass Road (Gold Mint Trail parking area) and ¼ mile away from the road including Archangel and Fishhook creeks, and upper Little Susitna River drainages. It also, includes portions of the upper Willow Creek drainage upstream of the confluence of Willow and Craigie creeks, including Grubstake Gulch and Homestake creeks, Summit Lake, and Bullion and Skyscraper mountains. There is no discharge of firearms allowed within ¼ mile of the road.
- (B) from August 10 to August 25, the area is closed to small game hunting except that small game may be taken by youth hunters 16 years old or younger accompanied by a licensed hunter 18 years old or older who has successfully completed a certified hunter education course if the youth has not

successfully completed a certified hunter education course. Youth hunters and accompanying adults must wear hunter orange vests while in the field.

WHAT ARE THE CURRENT REGULATIONS?

- The upland bird hunting season is open from August 10–March 31 with a bag limit of 10 ptarmigan and 15 grouse per day.
- The snowshoe hare hunting season is open year-round with a bag limit of 5 per day.
- Under Alaska State Parks restrictions, hunting is not allowed within ¼ mile of a developed facility or road (east side only) nor within the Independence Mine State Historical Park, Summit Lake State Recreation Site, and the Northern and Southern Development Areas of the Government Peak Unit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal closes the area defined by the Hatcher’s Pass Youth Hunt Management Area to small game hunting, except by youth hunters (16 years old and younger), from August 10– 25.

BACKGROUND: The Hatcher Pass Management Area has high recreational value and is used by consumptive and non-consumptive users. Hunting in the fall is focused on moose, bear, and small game; however, little is known about the harvest of small game in this area.

DEPARTMENT COMMENTS: The Department is **NEUTRAL** on this proposal because it allocates all small game hunting to youth hunters from August 10–25. The only other place with similar restrictions on small game hunting is the Skilak Loop Management Area in Unit 15B, which is closed to hunting and trapping except by youth hunters 16 years old or younger accompanied by a licensed hunter who has successfully completed a certified hunter education course (if the youth has not) during each weekend from November 1–December 31.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 104 – 5 AAC 85.060. Hunting season and bag limits for fur animals.

PROPOSED BY: Steve Perrins II

WHAT WOULD THE PROPOSAL DO? This proposal creates a general hunting season for beaver in Unit 16B with no closed season and no bag limit.

WHAT ARE THE CURRENT REGULATIONS?

- A hunting season for beaver has not been authorized in Unit 16.
- Trapping regulations allow beaver to be taken only by steel trap or snare from September 25–May 31; however, only submerged traps may be used from September 25–November 9. There is no bag limit for beaver under the trapping regulations.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal allows beaver to be taken year-round with a hunting license.

BACKGROUND: The sealing requirement for beaver taken in Unit 16 was eliminated in 2011. The average annual harvest from 2001 through 2010 was 86 beaver. The department has issued an average of 3 nuisance beaver permits per year during the last 5 years.

The diseases identified in the proposal are typically not associated with beavers and the risk to humans is almost non-existent. Also, there is no evidence that the strain of giardiasis that infects humans is the same strain that is carried by beavers.

While beaver dams can cause issues with fish passage, they can also provide rearing habitat for juvenile salmon. The Division of Sport Fish has been working on a project to locate beaver dams in the Susitna River drainage and to date they have found very few instances where beaver dams could interfere with fish passage.

In the early 2000s, a hunting season for beaver was established in Units 18, 22, and 23 with no closures and no bag limit. The addition of a hunting season was in response to an increase in the number of nuisance beaver requests from a number of local communities (Unit 18) and apparent range expansion (Units 22 and 23). While some communities continue to consume beaver, most beavers are harvested for fur and as trapping bait.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because it has not documented a biological concern for the beaver population in Unit 16B. Anecdotal information suggests that beaver remain abundant in the unit.

Units currently open to beaver hunting have a trapping season and bag limit that match the hunting season and bag limit. If this proposal is adopted, this will be the only area that has a more liberal hunting opportunity than what is provided under trapping regulations. The closed trapping season exists for the rearing of young and because the furs at that time of year are not prime.

Compliance with salvage conditions may be difficult: beaver that are shot in open water may sink thus making retrieval difficult, and without sealing requirements the additional legal incentive to salvage is absent.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 105 – 5 AAC 95.505. Palmer Hay Flats State Game Refuge.

PROPOSED BY: Thomas Rothe

WHAT WOULD THE PROPOSAL DO? The proposal allows, subject to the approval of the legislature, additions of state owned lands and waters to the Palmer Hay Flats State Game Refuge. These areas include primarily coastal wetlands contained in parcels obtained by the state for purposes of adding to the refuge to provide public access, including hunting access, and/or to conserve its fish and wildlife habitats.

WHAT ARE THE CURRENT REGULATIONS? Current regulations do not address the boundaries of the Palmer Hay Flats State Game Refuge. The Board of Game may set aside land for game reserves and refuges as per AS 16.05.255(a)(1).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would consolidate land management authority, thus assuring they are available for public use as part of the Palmer Hay Flats State Game Refuge. If adopted, the proposal would require legislative approval.

BACKGROUND: Since the late 1980s, the department has been acquiring or assuming management responsibility of several parcels of land contiguous with the Palmer Hay Flats State Game Refuge with the intent of adding them to the refuge. These parcels include acquisitions from willing private landowners, land trades with the Matanuska-Susitna Borough, and land management assignments from the Department of Natural Resources. Most of the fee simple acquisitions, including those listed by the proposer, were done in partnership with conservation organizations including Ducks Unlimited, The Nature Conservancy, Great Land Trust, The Conservation Fund, and others, and used various funding sources, including the North American Wetlands Conservation Act, Alaska Waterfowl Conservation Stamp program, private donors, and others. These conservation partners facilitated these acquisitions recognizing a desire to include these parcels in the refuge.

Totalling 3,626 acres, these parcels are managed for the purposes of conserving, enhancing, or restoring fish and wildlife habitat and providing for public access and use, including hunting. Most of these parcels have legal requirements (e.g., covenants and deed restrictions) that require they be managed for these purposes; however, the department lacks the refuge specific authority granted under AS 16.20.032 and 5 AAC 95 to do so. This fragmented management authority causes confusion among the public and hinders the department's ability and effectiveness in fulfilling its management responsibilities.

Incorporating these lands into the refuge ultimately requires legislative approval. The legislature has yet to move forward on these issues.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal, The department is interested in unifying the fragmented management in this area, in correcting two boundary omissions along sections of watercourses within the refuge, and in addressing the conservation and use of accreted wetlands adjoining the refuge in Knik Arm.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department; instead, it may result in cost savings by increasing management efficiency.

PROPOSAL 106 – 5 AAC 85.055. Hunting Seasons and Bag Limits for Dall sheep.

PROPOSED BY: Dan Montgomery

WHAT WOULD THE PROPOSAL DO? The proposal changes the bag limit for all of the sheep draw permits in Units 13D and 14A to full curl or larger, or a ram with the tips of both horns broken, or a ram

at least eight years of age or older; and maintains the overall harvest below 50% of known full-curl rams in each area.

WHAT ARE THE CURRENT REGULATIONS?

- Sheep drawing permit hunts in Units 13D and 14A are authorized for the Chugach Mountains with seasons that occur from August 10–September 20 (See Figure 106-1).
- The drawing permit hunts in Unit 14A are divided into 3 hunt areas to distribute harvest and hunting pressure (DS170–DS295). These hunts have an any-ram bag limit with 10% of the drawing permits allocated to nonresident hunters.
- The Taz West hunt area (DS160 and DS260) includes the western portion of Unit 13D from the Tazlina Glacier, Tazlina Lake, and the western shore of Mendelta Creek to the Unit 14A boundary. The bag limit is any ram with 20% of the drawing permits allocated to nonresident hunters.
- The Taz East hunt area (DS165 and DS265) includes the eastern portion of 13D from the Richardson Highway to the boundary of Taz West. These hunts have a full-curl bag limit with 20% of the permits allocated to nonresident hunters.
- The remainder of both units are managed with a full-curl bag limit and do not require a drawing permit.

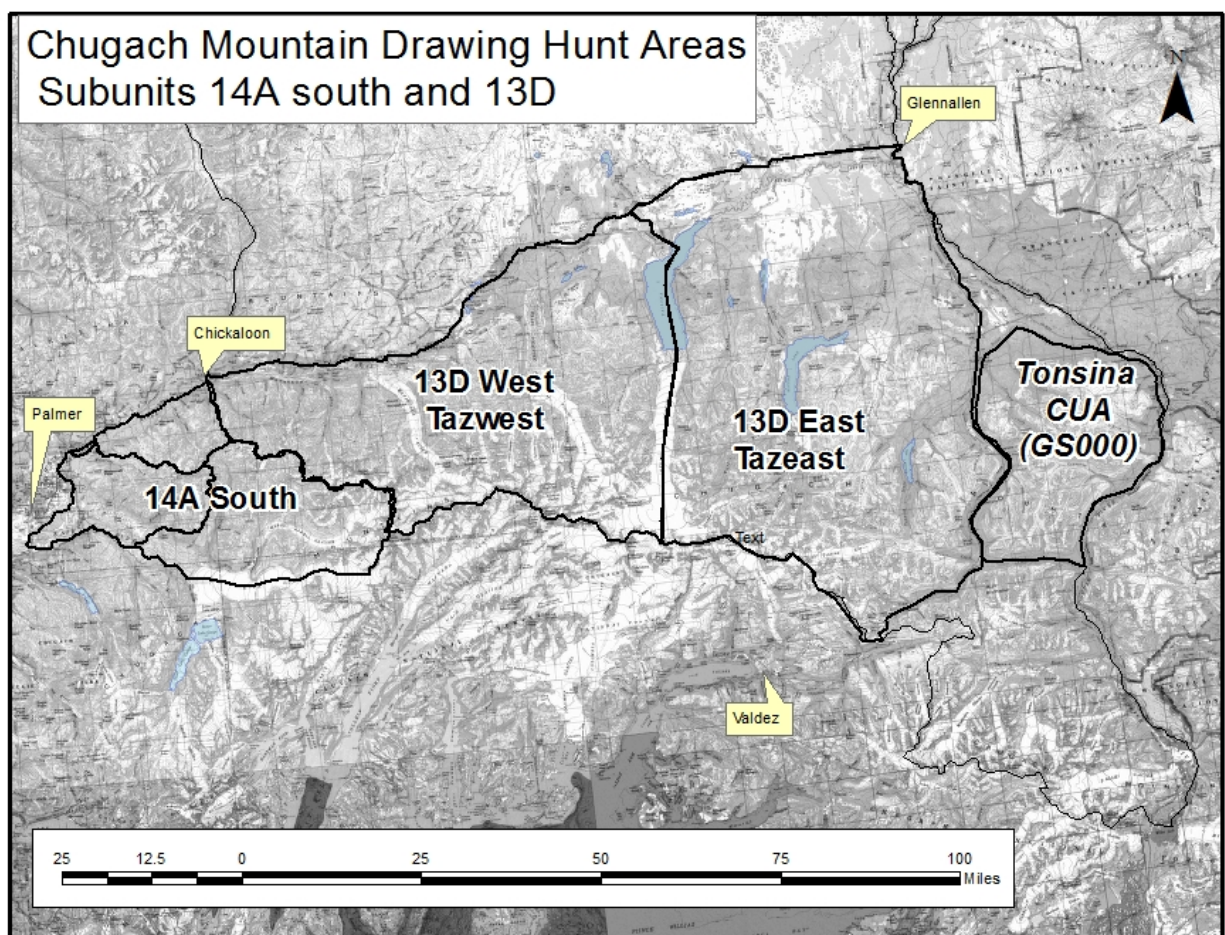


Figure 106-1: Map of drawing permit hunt areas in Units 13D and 14A.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal changes the management direction for sheep hunts in the Chugach Mountain portions of Units 13D and 14A to a full-curl management system with a greater emphasis on hunt quality by restricting the bag limit for drawing permit hunts in the western portion of Unit 13D and in Unit 14A from any-ram to a full-curl and reducing hunting opportunity in Unit 14A. Hunting opportunity would increase in Unit 13D. The current hunt structure was also adopted to improve hunt quality by reducing “hunter crowding”, which reduced the number of hunters in the field by 68% in Unit 14A and 76% in 13D.

BACKGROUND: The board adopted the current regulations in 2007 following a decline in sheep numbers and continued high hunting pressure. The regulatory changes included the establishment of a drawing hunt structure in the Chugach Mountain areas, liberalization of bag limits in some areas to include any-ram hunts, and the allocation of harvest opportunity between residents and nonresidents.

In an attempt to discern differences between the two hunt strategies, the board divided Unit 13D west of the Richardson Highway into two draw hunt areas with the portion of Unit 13D from the Richardson Highway to the Tazlina Glacier, Tazlina Lake, and the west bank of Mendelta Creek (Taz East) with a full curl bag limit and the portion west of that line (Taz West) with an “any ram” bag limit.

The primary limitations on sheep abundance in the Chugach Mountains appear to be nutrition and stochastic factors that affect productivity and survival. The Unit 14A sheep population appears to be stable, while the Unit 13D population appears to be declining primarily due to a decrease in the number of ewes and lambs observed during surveys. Recent sheep research in Unit 13D found that sheep are nutritionally stressed.

Unit 14A, Chugach Mountains

After the any ram drawing hunts were implemented in Unit 14A, sheep harvest decreased from an average of 24 rams (2000–2007) to 12 rams (2008–2014) (Table 106-1). The current level of harvest is sustainable and has not had a negative impact on the sheep population. The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system. Hunter success increased from 22% to 36% after the drawing permit hunt was implemented. The horn size of sheep harvested also decreased from an average of 36 inches to 32 inches during the same periods.

Under the proposed permit structure, 24 permits would be issued for the Unit 14A drawing hunt in 2015 (22 permits issued to residents and 2 to nonresidents) with an anticipated harvest of 6 full-curl rams. This change would result in a 68% reduction in sheep hunting opportunity in Unit 14A, and a 65% reduction in harvest.

Table 106-1. Unit 14A Dall sheep hunts and harvest, regulatory years 2000 through 2014.

Regulatory Year	Total Permits	Total Hunters	Total Harvest	% Success	Average Length of Longest Horn	Average Age
<i>Pre-Draw</i>						
2002	-	104	20	19%	34.5	8.4
2003	-	103	22	21%	35.9	8.9
2004	-	113	32	28%	36.1	8.5

2005	-	104	29	28%	36.5	8.4
2006	-	125	24	19%	36.1	8.5
2007	-	104	22	21%	35.4	8.6
<i>Post-Draw</i>						
2008	40	17	8	47%	32.8	6.7
2009	40	25	9	36%	28.0	5.9
2010	40	25	6	24%	29.4	6.7
2011	50	42	14	33%	35.0	7.4
2012	50	43	13	30%	32.2	6.8
2013	75	39	18	46%	30.6	6.9
2014	75	49	17	35%	33.4	7.2

Table 106-2. Unit14A Dall sheep survey composition results and harvest, regulatory years 2000 through 2014.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
1998	218	28	38	136%	190	0	0%
2002	276	19	32	168%	257	0	0%
2006	167	26	35	135%	141	0	0%
2007	145	18	34	189%	127	0	0%
2009	134	8	1	13%	126	8	6%
2010	167	14	3	21%	153	3	2%
2012	177	16	5	31%	161	8	5%
2013	168	11	6	55%	157	8	5%
2014	172	13	8	62%	159	11	7%

Unit 13D, Taz West, Chugach Mountains

After the any ram drawing hunts were implemented in Unit 13D, Taz West, sheep harvest decreased from an average of 18 rams (2000–2007) to 4 rams (2008–2014) (Table 106-3). The current level of harvest is sustainable and has not had a negative impact on the sheep population. The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system. Hunter success increased from 34% to 47% after the drawing permit hunt was implemented. The horn size of sheep harvested also decreased from an average of 36 inches to 35 inches during the same periods.

Under the proposed permit structure, 31 permits would be issued for Unit 13D, Taz West, (25 permits issued to residents and 6 to a nonresident) with an anticipated harvest of 9 sheep. This change would result in a 194% increase in sheep hunting opportunity, and a 225% increase in harvest.

Table 106-3. Unit 13D Taz West Dall sheep hunts and harvest, regulatory years 2002 through 2014.

Regulatory Year	Total Permits	Total Hunters	Total Harvest	% Success	Average Length of Longest Horn	Average Age
<i>Pre-Draw</i>						
2002	-	61	12	20%	35.2	8.4
2003	-	52	22	42%	37.1	8.7

2004	-	62	29	47%	36.6	8.4
2005	-	50	21	42%	37.2	9.0
2006	-	43	10	23%	35.5	8.8
2007	-	47	13	28%	35.2	9.3
<i>Post-Draw</i>						
2008	10	6	3	50%	32.5	5.3
2009	10	6	3	50%	35.1	7.0
2010	10	6	3	50%	38.0	8.0
2011	10	8	3	38%	37.8	8.8
2012	12	11	8	73%	36.3	8.3
2013	16	13	6	46%	31.2	6.7
2014	16	10	2	20%	36.9	7.5

Table 106-4. Unit 13D Taz West Dall sheep survey composition results and harvest, regulatory years 2000 through 2014.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
2007	92	9	13	144%	83	0	0%
2008	124	30	1	3%	94	2	2%
2009	112	13.5	1	7%	98	2	2%
2012	122	22	7	32%	100	1	1%
2013	125	18	3	17%	107	3	3%
2014	105	7	1	14%	98	1	1%

Unit 13D, Taz East, Chugach Mountains

After the any ram drawing hunts were implemented in Unit 13D, Taz West, sheep harvest decreased from an average of 28 rams (2000–2007) to 10 rams (2008–2014) (Table 106-5). The current level of harvest is sustainable and has not had a negative impact on the sheep population. The reduced harvest was a direct result of limiting the number of hunters that could participate in the hunt under the new draw permit system. Hunter success increased from 33% to 46% after the drawing permit hunt was implemented. The horn size of sheep harvested also increased from an average of 37 inches to 38 inches during the same periods.

Under the proposed permit structure, 21 permits would be issued for Taz East (17 permits issued to residents and 4 to nonresidents) with an anticipated harvest of 6 sheep. This change would result in a 16% decrease in sheep hunting opportunity, and a 22% reduction in harvest.

Table 106-5. Unit 13D Taz East Dall sheep hunts and harvest, regulatory years 2002 through 2014.

Regulatory Year	Total Permits	Total Hunters	Total Harvest	% Success	Average Length of Longest Horn	Average Age
<i>Pre-Draw</i>						
2002	-	82	33	40%	34.7	8.1
2003	-	96	42	44%	36.4	8.9
2004	-	100	36	36%	36.4	8.4
2005	-	87	25	29%	37.7	8.5

2006	-	60	16	27%	37.5	8.7
2007	-	96	18	19%	36.7	9.0
<i>Post-Draw</i>						
2008	41	23	3	13%	38.5	8.3
2009	41	22	10	45%	37.6	7.6
2010	41	26	13	50%	38.3	7.8
2011	41	32	19	59%	38.9	8.6
2012	50	38	11	29%	39	8.8
2013	50	24	8	33%	39.2	9.4
2014	25	10	9	90%	36.7	8.9

Table 106-6. Unit 13D Taz East Dall sheep survey composition results and harvest, regulatory years 2000 through 2014.

Survey Year	Total Rams Observed	≥ Full curl Rams Observed	≥ Full curl Harvested	% Full curl Harvested	Sub-full curl Observed	Sub-full curl Harvested	% Sub-full curl Harvested
2006	132	19	16	84%	113	0	0%
2007	125	13	18	138%	113	0	0%
2009	76	20	10	50%	56	0	0%
2010	115	27	13	48%	88	0	0%
2012	100	21	11	52%	79	0	0%
2014	103	12	9	75%	107	0	0%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal because either management strategy (current and proposed strategies) can be used to sustainably manage sheep in Units 14A and 13D. The current management strategy has not resulted in a decrease in the number of sheep or the number of rams observed during surveys.

Similar to the proposed strategy, the current hunt structure was also designed to improve hunt quality by reducing “hunter crowding” through a drawing permit hunt structure, which reduced the number of hunters in the field by 68% in Unit 14A and 76% in 13D. The proposed strategy will further reduce the number of hunters in the field (increasing quality of the hunting experience and decreasing hunting opportunity) and is expected to result in an equally sustainable harvest.

As a result of limitations to sightability and classification error, quantifying the total number of full curl rams in a population during surveys remains problematic. Surveys consistently underestimate the number of full-curl rams available for harvest. Incomplete and partial survey coverage of the hunt areas will also make it challenging to determine the number of permits to issue annually.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 107 – 5 AAC 85.055. Hunting Seasons and Bag Limits for Dall sheep. Change the bag limit for Dall sheep in Units 13D and 14A to full curl.

PROPOSED BY: Anchorage Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? The proposal changes the bag limit for sheep in Units 13D and 14A from any ram to full curl or larger, or a ram with the tips of both horns broken, or a ram at least eight years of age or older.

WHAT ARE THE CURRENT REGULATIONS? Draw sheep hunts in parts of Unit 13D (DS160 and DS260) and all of Unit 14A are “any ram” hunts. The remainders of both units outside the draw area are currently under full curl regulations.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal differs from Proposal 106 in that it does not limit the overall harvest. The proposal seeks to eliminate the “any ram” hunts and return to one ram with horns full curl or greater which would reduce opportunity and decrease harvest.

BACKGROUND: See background provided for Proposal 106.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal and believes the proposed strategy can be used to manage sheep in Alaska if it is desired.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 108 – 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts, and 92.069. Special provisions for moose drawing permit hunts.

PROPOSED BY: Daniel Montgomery

WHAT WOULD THE PROPOSAL DO? This proposal would reinstate the requirement for proof of guide-client contract for sheep and goat drawing hunts specified in 5 AAC 92.057 and for moose drawing hunts specified in 5 AAC 92.069.

WHAT ARE THE CURRENT REGULATIONS? The current regulation requires nonresidents applying for drawing permits in areas specified in the regulation to present proof at the time of application that they will be hunting with a registered guide or a resident spouse or relative within the second degree of kindred. If the nonresident is applying for the hunt with a guide, the guide is required to be registered for the guide use area that the hunt will occur during the season the drawing permit is valid.

5 AAC 92.057 applies to drawing hunts for sheep in Units 13B, 13C, 13D, and 14A. These requirements do not apply to goat (5 AAC 92.057) or moose (5 AAC 92.069) drawing hunts in Region IV.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department currently requires nonresident applicants who will be hunting with a guide to provide a unique verification code (UVC) from Department of Commerce, Community, and Economic Development (DCCED), Division of Occupational Licensing, as proof that the guide is registered for the hunt area (Guide Use Area).

BACKGROUND: The board adopted requirements for nonresidents to demonstrate that they were hunting with a registered guide or a spouse or relative within the second degree of kindred in areas with resident-nonresident allocations for drawing hunt opportunity. Because the department does not administer guide licenses or registrations, the department did not have the authority or the resources to review and verify guide registrations, particularly on lands without exclusive guide use areas. Investigations into violations also failed to bring legal action due to the nature of how the guide-client

agreement is formed and the fact that a “guide-client agreement” is not defined anywhere in statute or regulation. In 2014, the department announced that it could not administer the guide-client agreement required in regulation, but also told the board that it would work with DCCED to try to find a new feasible alternative. DCCED now plays an active role in verifying that the guide is registered for the hunt area prior to the submission of the nonresident application by providing registered guides with a UVC. Submission of the UVC on the application is presumed to be a demonstration that a guide-client contract has been established. The current system will be in place until June 30, 2015 to give the Big Game Commercial Services Board time to develop new regulations or procedures to verify guide-client contracts for the purposes of applying for drawing permit hunts.

DEPARTMENT COMMENTS: The department recommends **TAKE NO ACTION** on this proposal because action requested does not require the adoption of new regulatory language. The department is currently applying the regulation in the only feasible manner available by working with DCCED to verify guide registrations. Prior attempts to apply this regulation were not feasible for the department to administer and failed to result in any legal action for guides or clients who did not conform to the regulatory requirements.

COST ANALYSIS: Adoption of this proposal would result in significant costs to the department in staff time and administration.

PROPOSAL 109 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Tom Lamal

WHAT WOULD THE PROPOSAL DO? This proposal limits nonresident participation in sheep hunts to a maximum of 10% of sheep hunters in Region IV. Participation in the general hunts would be based on a 5-year average.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)

- Bag Limit: 1 ram
- Season: August 10–September 20
- Allocation: 80% resident and 20% nonresident
- Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain ranges and hunt areas:
 - Alaska Range Units 13B, 13E, and 16
 - Aleutian Range Unit 9
 - Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
 - Talkeetna Mountains Units 13A, 13E, 14A, and 14B
 - Wrangell Mountains Unit 11

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 11; amount reasonably necessary for subsistence = 60–75 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The board would need to create nonresident drawing permit hunts for all sheep hunts in Region IV to regulate participation in these hunts. If a resident drawing permit hunt is not adopted, the requirement to allocate a maximum of 10% of the sheep hunting opportunity to nonresidents will be more difficult to achieve. The nonresident permit allocation would be based on a 5-year average of information collected 2 years in advance of the hunt.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. Table 1 contains sheep hunting statistics for Region IV hunts during the past 10 regulatory years. Table 2 would be used to guide the structure of the proposed allocation based on the past 5 regulatory years and is provided for comparison.

If adopted, the allocation of sheep hunting opportunity for nonresidents in the Unit 13D drawing hunts would decrease from 20% to 10% of the permits available, and nonresident participation in sheep hunts region-wide would decrease from 14% to a 10% or less.

The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

This proposal is not likely to affect sheep populations because the current full-curl bag limit adequately guards against overharvest, at least in most cases. In heavily harvested areas, limiting nonresident hunters may increase the number of legal rams available to residents, but the extent to which this might occur is unknown. In areas heavily hunted by residents, this proposal may provide little benefit to resident sheep hunters.

Table 109-1. Sheep hunting statistics using 10-year averages for all sheep hunts in Region IV, regulatory years 2004 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	179	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%
Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	61	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

Table 109-2. Sheep hunting statistics using the proposed 5-year averages for all sheep hunts in Region IV, regulatory years 2009 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	710	88%	144	63%	15%	60%
Unit 9A	1	25%	0	---	0%	0%
Unit 9B	3	92%	1	100%	50%	0%
Unit 11	140	87%	48	76%	30%	65%
Unit 13A	181	94%	17	80%	8%	33%
Unit 13B	38	96%	4	85%	9%	43%
Unit 13C	28	86%	3	29%	4%	60%
Unit 13D	77	83%	21	52%	17%	75%
Unit 13E	99	83%	15	26%	5%	66%
Unit 14A	79	89%	18	71%	18%	62%
Unit 14B	25	76%	6	17%	5%	80%
Unit 16A	3	93%	0	---	0%	0%
Unit 16B	32	73%	9	58%	23%	44%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocation between resident and nonresident hunters. This proposal closely mirrors other proposals to allocate sheep hunting opportunity throughout Alaska. If the board adopts the nonresident drawing permit hunt requirements needed to administer this allocation without a resident drawing permit hunt, the department will need guidance from the board on how to administer the nonresident permit allocation to conform to regulatory requirements.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 110 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Jake Sprinkle

WHAT WOULD THE PROPOSAL DO? This proposal would limit nonresidents to 10% of the total sheep harvest in Units 11, 13, 14, and 16.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain ranges and hunt areas:

- Alaska Range Units 13B, 13E, and 16
- Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
- Talkeetna Mountains Units 13A, 13E, 14A, and 14B
- Wrangell Mountains Unit 11

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 11; amount reasonably necessary for subsistence = 60–75 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would issue drawing permits to nonresidents with the goal of limiting the sheep harvest by nonresidents to 10% or less of the total harvest. Because there is no mechanism to restrict participation in general season hunts, the board would need to establish a drawing permit hunt structure for nonresident sheep hunters in the remainder of Region IV.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

Limiting nonresidents to 10% of the sheep harvest will increase the number of legal rams available to residents. During 2004–2013, 86% of sheep hunters throughout the region were residents who took 62% of the harvest (average = 16% success). Nonresident took 38% of the sheep (average = 57% success).

Table 110-1. Sheep hunting statistics for all sheep hunts in Region IV, regulatory years 2004 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	179	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%
Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	61	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of harvests between resident and nonresident sheep hunters. Because resident participation and success change over time, it will be difficult to accurately achieve the proposed harvest allocation, even if resident and nonresident hunting opportunity is regulated by a drawing permit hunt. In-season management to achieve the harvest allocation will also be extremely difficult, even with a short reporting period requirement for successful hunters.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 44.)

PROPOSAL 111 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep, and 5 AAC 92.057, Special provisions for Dall sheep drawing permit hunts.

PROPOSED BY: Alaska Chapter Backcountry Hunters & Anglers

WHAT WOULD THE PROPOSAL DO? This proposal would change the nonresident general season sheep hunts to drawing permit hunts in the Interior Region, and limit the number of nonresident permits based on sheep density or historical harvest. Residents would continue to hunt under general season harvest tickets.

WHAT ARE THE CURRENT REGULATIONS?

General Season Hunts

- Unit 24B, John River drainage upstream from Till Creek, and in the Glacier River Drainage
 - residents only — August 1–April 30, 3 sheep
- Remainder of Units 12, 19, 20, 24, 25, 26B and 26C
 - residents and nonresidents — August 10–September 20, one full-curl ram
- No sheep hunting opportunity exists in Unit 21.

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 19; amount reasonably necessary for subsistence = 1–5 sheep.
- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Nonresident hunters would be required to apply for drawing hunts throughout Interior Alaska. Resident hunters would continue to hunt under general season harvest tickets where general seasons currently exist. The department would recalculate the number of nonresident permits annually for each area based on survey and harvest data.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

The proposer has expressed concern about sheep conservation and continued resident general season sheep hunting opportunity. The requirement to harvest full-curl rams should prevent over-harvest from

affecting sustainability of sheep populations. In heavily harvested areas, limiting the number of nonresident hunters may increase the number of legal rams available to residents, but the extent to which this might occur is unknown. In areas hunted primarily by residents, this proposal may not provide any benefit to resident sheep hunters.

Lower success rates compared with the 1980s and higher hunter numbers compared with the late 1990s suggest that competition among hunters for legal rams has increased. Region-wide, sheep harvest peaked during the late 1980s, declined through the late 1990s, and has been increasing since 2000. This pattern is most evident in the eastern Brooks Range and Unit 20A, which account for much of the total harvest for Region III. However, harvest in some areas has either remained stable since the initial population decline (Unit 19C, see Proposal 65) or continued to decline (Unit 12).

During 2004–2013, 70% of general season sheep hunters were residents. They took 50% of the harvest and had a 29% success rate. Thirty percent of the general season sheep hunters were nonresidents. They took 50% of the harvest and had a 62% success rate.

Table 111-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts:

Unit/Area	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region III	1,254	70%	503	50%	29%	62%
Unit 12	288	76%	106	55%	27%	63%
Unit 19C	136	47%	72	29%	33%	64%
Unit 20A	226	64%	90	38%	24%	67%
Remainder Unit 20	39	93%	9	90%	22%	28%
Unit 25A	131	59%	71	49%	45%	65%
Unit 25C	52	95%	9	92%	17%	12%
Units 26B & 26C	287	76%	115	60%	32%	59%
Remainder Reg. III	96	77%	31	61%	26%	52%

Department records for fall 2011 differ from the proponent's numbers because the database is updated as new records are received and the department is able to reconcile some ambiguous data. For example, more recent data for fall 2011 in Units 26B and 26C indicate that 329 hunters (268 residents, 55 nonresidents, 6 unknown residency) hunted this portion of the Eastern Brooks Range; residents killed 98 rams (37% success, 72% of total harvest), nonresidents killed 39 rams (71% success, 28% of total harvest), and 2 of unknown residency killed 2 rams (33% success, 0.6% of total harvest).

Calculating the allowable harvest by nonresidents based on survey data would be difficult to achieve. As a result of limitations to sightability and classification error, quantifying the total number of full-curl rams in a population during surveys remains problematic. Surveys consistently underestimate the number of full-curl rams available for harvest. Furthermore, it is logistically difficult and expensive to count sheep populations in vast rugged terrain that is subject to weather and observation conditions dependent on short windows of time between snow melt and the start of hunting season. Therefore, not all sheep populations are monitored on a regular basis and in many circumstances, sheep in a small portion of the hunt area are counted to obtain only sex and age composition of the population, not overall numbers. Without regular population estimates, fluctuations in population numbers are difficult to detect.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. Because resident participation and success change over time, it will be difficult to accurately achieve the proposed harvest allocation, even if residents and nonresidents hunting opportunity is regulated by a drawing permit hunt. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 46.)

PROPOSAL 112 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Vern Fiehler

WHAT WOULD THE PROPOSAL DO? Change all nonresident sheep hunts in Region III to drawing permit hunts and limit permits to 10% of the 10-year average harvest for the region.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts

- Delta Controlled Use Area (portions of Units 20D, 20A and 13B)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram.
 - Nonresidents are limited to 10% of permits.
 - 120 permits in 2015
- Tok Management Area (Unit 12 and portions of Units 13C and 20D)
 - residents and nonresidents — August 10–25 or August 26–September 20, one-full curl ram every 4 years.
 - Nonresidents are limited to 10% of permits.
 - 60 permits in 2015
- Mount Harper (portions of Units 20D and 20E)
 - residents and nonresidents — August 10–September 20, one full-curl ram.
 - 4 permits annually. The board has not specified an allocation of these 4 permits between residents and nonresidents.

Registration Permit Hunts

- Unit 19C
 - residents only — October 1–April 30, one sheep with three-quarter curl or smaller; excluding rams with both tips broken (broomed), lambs and ewes with lambs.
- Unit 26C and that portion of Unit 25A east of Middle Fork Chandalar River, excluding the federally designated Arctic Village Sheep Management Area
 - residents only — October 1–April 30, 3 sheep, access restrictions apply.

General Season Hunts

- Unit 24B, John River drainage upstream from Till Creek, and in the Glacier River Drainage
 - residents only — August 1–April 30, 3 sheep.
- Remainder of Units 12, 19, 20, 24, 25, 26B and 26C

- residents and nonresidents — August 10–September 20, one full-curl ram.
- No sheep hunting opportunity exists in Unit 21.

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 19; amount reasonably necessary for subsistence = 1–5 sheep.
- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Nonresidents would be required to apply for drawing permits to hunt Dall sheep anywhere in Region III. Resident seasons would not change from general season harvest tickets.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

This proposal is not likely to affect sheep populations, since the current full curl ram bag limit adequately guards against overharvest, at least in most cases. In heavily harvested areas, limiting nonresident hunters may increase the number of legal rams available to residents, but the extent to which this might occur is unknown. In areas heavily hunted by residents, this proposal may not provide any benefit to resident sheep hunters.

During 2004–2013, 70% of general season sheep hunters throughout the region were residents who took 50% of the harvest (average = 29% success). Nonresident success in general season hunts is generally greater than 60%.

Table 112-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts:

Unit/Area	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region III	1,254	70%	503	50%	29%	62%
Unit 12	288	76%	106	55%	27%	63%
Unit 19C	136	47%	72	29%	33%	64%
Unit 20A	226	64%	90	38%	24%	67%
Remainder Unit 20	39	93%	9	90%	22%	28%
Unit 25A	131	59%	71	49%	45%	65%
Unit 25C	52	95%	9	92%	17%	12%
Units 26B & 26C	287	76%	115	60%	32%	59%
Remainder Reg. III	96	77%	31	61%	26%	52%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 47.)

PROPOSAL 113 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Alaskan Bowhunters Association

WHAT WOULD THE PROPOSAL DO? Add a sheep hunt for bowhunters in all general season sheep hunting areas during August 1–9. The bag limit would be one full-curl ram. International Bowhunter Education Program (IBEP) certification would be required.

WHAT ARE THE CURRENT REGULATIONS?

General Season Hunts

- Unit 24B, John River drainage upstream from Till Creek, and in the Glacier River Drainage
 - residents only — August 1–April 30, 3 sheep.
- Remainder of Units 12, 19, 20, 24, 25, 26B and 26C
 - residents and nonresidents — August 10–September 20, one full-curl ram.
- No sheep hunting opportunity exists in Unit 21.
- Hunts are not weapons-restricted, except within the Dalton Highway Corridor Management Area, where only IBEP-certified bowhunters may hunt, only by bow and arrow.

Subsistence Law

- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Bowhunters would have the opportunity to hunt Dall sheep for 9 days without competition from rifle hunters. All bowhunters who pursue Dall sheep in the new August 1–9 general season hunts would be required to obtain International Bowhunter Education Program (IBEP) certification.

BACKGROUND: This proposal attempts to reduce crowding in general season Dall sheep hunting areas throughout Region III by allowing archery hunters with IBEP certification to pursue Dall sheep prior to the regular season throughout Region III.

Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

This proposal is not likely to affect sheep populations, since the current full-curl ram bag limit adequately guards against overharvest, at least in most cases. In heavily harvested areas, allowing archers to hunt sheep before hunters who use rifles may increase the number of legal rams available to bowhunters, separate bowhunters and rifle hunters, and spread hunting pressure through a longer season, but the extent to which this might occur is unknown. In heavily hunted areas, this proposal may not provide these

benefits. During 2004–2013, about 5,000 sheep were harvested in Region III during general season hunts, of these, 80 (less than 2% of the known method of take) were harvested by bowhunters (71% residents). Hunting methods used by unsuccessful hunters are not recorded; therefore, the extent to which this proposal would spread out hunting pressure is unknown.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between bowhunters and rifle hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 48.)

PROPOSAL 114 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep, and 5 AAC 92.057, Special provisions for Dall sheep drawing permit hunts.

PROPOSED BY: Middle Nenana Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Change the nonresident general season sheep hunts in all of Unit 20 to drawing permit hunts, and limit nonresident permits to 75% of the historical average number of nonresident harvest tickets issued. Residents would continue to hunt under general season harvest tickets.

WHAT ARE THE CURRENT REGULATIONS?

General Season Hunts (residents and nonresidents)

- Unit 20 (except in the Delta Controlled Use Area, the Tok Management Area and the Mount Harper sheep hunt area):
 - residents and nonresidents — August 10–September 20, one full-curl ram.

Drawing Permit Hunts

- Delta Controlled Use Area (portions of Units 20D, 20A and 13B)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram.
 - Nonresidents are limited to 10% of permits.
 - 120 permits in 2015
- Tok Management Area (Unit 12 and portions of Units 13C and 20D)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram every 4 years.
 - Nonresidents are limited to 10% of permits.
 - 60 permits in 2015
- Mount Harper (portions of Units 20D and 20E)
 - residents and nonresidents — August 10–September 20, one-full curl ram.
 - 4 permits annually. The board has not specified an allocation of these 4 permits between residents and nonresidents.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? In the majority of Unit 20, where both residents and nonresidents hunt under general seasons, nonresident hunter numbers would be limited by drawing permit and resident hunter numbers would be unlimited. Nonresidents hunters would be required to apply for drawing hunts throughout Unit 20, in addition to the drawing hunt

areas in the Delta Controlled Use Area (portions of Unit 20A and 20D), the Tok Management Area (portion of Unit 20D), and the Mount Harper sheep hunt area (portion of Unit 20D). Resident hunters would continue to hunt under general season harvest tickets where general seasons currently exist.

BACKGROUND: This proposal attempts to reduce crowding during the general sheep hunting season by limiting nonresident hunters throughout Unit 20 to drawing permits.

Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

The requirement to harvest full-curl rams should prevent over-harvest from affecting sustainability of sheep populations. In heavily harvested areas, limiting the number of nonresident hunters may increase the number of legal rams available to residents, but the extent to which this might occur is unknown. In areas heavily hunted by residents, this proposal may not provide any benefit to resident sheep hunters.

If the board adopts this proposal, the department suggests that it could be limited to specific areas where hunter crowding and nonresident harvest is an issue. Lower success rates compared with the 1980s and higher hunter numbers compared with the late 1990s suggest that competition among hunters for legal rams has increased. Sheep harvest in Unit 20 peaked during the late 1980s, declined through the late 1990s, and has been increasing since 2000. This pattern is most evident in Unit 20A, which accounts for most of the general season harvest in Unit 20.

During 2004–2013, most general season hunters in Unit 20 were residents. Although fewer nonresidents hunted (average = 83), their success rate was higher; consequently, they harvested more rams (average = 54) than resident hunters (average = 42) each year.

Table 114-1. General season hunter statistics during fall 2004-2013 Dall sheep hunts in Unit 20

Game Management Unit*	Average annual number of hunters	Resident hunters	Non-resident hunters	Average annual harvest	Harvest taken by residents	Resident success rate	Non-resident success rate
Unit 20A	226	64%	36%	90	38%	24%	67%
Unit 20B	15	97%	3%	3	97%	20%	20%
Unit 20C	4	81%	19%	1	50%	12%	50%
Unit 20D	3	74%	26%	<1	100%	10%	0%
Unit 20E	15	96%	4%	5	93%	30%	33%
All Unit 20**	265	69%	31%	99	43%	23%	65%

*Little sheep habitat occurs in Unit 20F, and only 1 sheep has been harvested in that unit.

**Includes hunters in Unit 20F and those who did not specify where in Unit 20 they hunted

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 113.)

PROPOSAL 115 – 5 AAC 85.055(8). Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Dave Machacek

WHAT WOULD THE PROPOSAL DO? Create a drawing permit youth hunt for one Dall sheep per lifetime in the remainder of Unit 20 during July 20–August 5. Drawing permit hunt conditions listed by the proposer include:

- Successful completion of a department-approved Hunter Education Course.
- Accompaniment by a licensed resident adult that is at least 21 years of age or older.
- Prohibition of proxy hunting.
- Hunter age requirement of 10–17.

WHAT ARE THE CURRENT REGULATIONS?

For residents and nonresidents in:

- Unit 20D within the Tok Management Area, 1 ram with full-curl horn or larger every 4 regulatory years by permit, August 10–25 or August 26–September 20.
- Units 20A and 20D portions within the Delta Controlled Use Area, 1 ram with full-curl horn or larger by permit, August 10–25 or August 26–September 20.
- Units 20D and 20E portions north of the Alaska Highway and that portion within the Middle Fork of the Fortymile River drainage north and west of the north bank upstream from and including the Joseph Creek drainage (Mount Harper hunt area), 1 ram with full-curl horn or larger by permit, August 10–September 20.
- Unit 20 Remainder, 1 ram with full-curl horn or larger by harvest ticket, August 10–September 20.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be 17 days of opportunity for youth hunters to hunt any sheep before the general season opens in Unit 20 outside the Tok Management Area (DM102, DM103), Delta Controlled Use Area (DM203, DM204), and the Mt. Harper drawing permit area (DM206).

BACKGROUND: In the Remainder of Unit 20, most of the available sheep and sheep hunting opportunity is in Unit 20A. The department believes that most of the harvest that may result from this hunt will come from this unit. A unit-wide survey has not been conducted in Unit 20A; however, survey results from the trend count area in central Unit 20A indicate the sheep population had been increasing or

stable during 2008–2012. The late onset of spring in 2013 likely caused the lowest lamb:ewe ratio (11 lambs:100 ewes) on record in the area; therefore, the population will experience poor recruitment from this year’s cohort and likely decline. The average annual harvest in all of Unit 20A for regulatory years 2008–2009 through 2012–2013 (RY08–RY12) was 100 sheep.

Unit 20B has a small, low density sheep population that mainly inhabits the upper Chena River and upper Salcha River drainages. The department has not conducted surveys on this population. Access is difficult and the 5-year average (RY08–RY12) annual harvest is 4 rams.

Unit 20E, outside of the Mount Harper (DS206) and Tok Management Area (DM102, DM103) drawing permit areas, also has a small, low density sheep population. Most inhabit drainages of the Charley River and the Glacier Mountain Controlled Use Area. The average annual harvest in this portion of Unit 20E during RY08–RY12 was 4 rams.

Units 20C and 20F typically do not have sheep populations that could be hunted. Most sheep in Unit 20C are in Denali National Park, and therefore cannot be hunted. In Unit 20F, sheep rarely occur.

Most Unit 20D sheep are either in the Delta Controlled Use Area (DS203, DS204) or the Mount Harper (DS206) drawing permit area; therefore, there is little hunting opportunity outside these areas.

A drawing permit for any sheep would require that few permits could be issued and harvest would need to be spread throughout the unit. Such a hunt would be contrary to the full-curl management strategy used in most of the state to protect sheep populations from unsustainable harvest.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocation issue. The department has no conservation concerns if the number of permits is low, so that potential harvest of ewes and small rams does not affect these populations

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this hunt. Cost to the department would increase due to administration of an additional drawing hunt.

PROPOSAL 116 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Keenan Zerkel

WHAT WOULD THE PROPOSAL DO? This proposal would reduce sheep hunting opportunity for nonresidents in Region IV by authorizing shorter seasons for nonresidents than residents, or limiting drawing permits, or by some other method of reducing the number of nonresident hunters.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

- Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain ranges and hunt areas:
 - Alaska Range Units 13B, 13E, and 16
 - Aleutian Range Unit 9
 - Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
 - Talkeetna Mountains Units 13A, 13E, 14A, and 14B
 - Wrangell Mountains Unit 11

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 11; amount reasonably necessary for subsistence = 60–75 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? To adopt this proposal, the board will need to develop and adopt regulations to reduce sheep hunting opportunity for nonresidents. The proposal only requests that nonresident opportunity be reduced through some mechanism and suggests using shorter season dates for nonresidents than residents or a drawing permit hunt structure as 2 possibilities.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

This proposal is not likely to affect sheep populations because the current full-curl bag limit adequately guards against overharvest, at least in most cases. In heavily harvested areas, limiting nonresident hunting opportunity may increase the number of legal rams available to residents, but the extent to which this

might occur is unknown. In areas heavily hunted by residents, this proposal may provide limited benefits to resident sheep hunters.

During 2004–2013, 86% of sheep hunters throughout the region were residents who took 62% of the harvest (average success = 16%). Nonresident took 38% of the harvest (average success = 57%).

Table 116-1. Sheep hunting statistics for all sheep hunts in Region IV, regulatory years 2004 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	179	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%
Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	61	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of harvests between resident and nonresident sheep hunters. The suggestion to use shorter season dates for nonresidents than residents or a drawing permit hunt structure are both feasible ways of reducing nonresident hunting opportunity.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 117 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Paul Ferucci

WHAT WOULD THE PROPOSAL DO? This proposal would limit number of drawing permits awarded to nonresidents to 10% of the permits available. Successful applicants (residents and nonresidents) would not be allowed to apply for the hunt again, making the permits a “once in a lifetime” hunt.

WHAT ARE THE CURRENT REGULATIONS?

Region IV Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the allocation of sheep drawing hunt opportunity for nonresidents in Unit 13D would decrease from a 20% allocation to a 10% allocation. Successful applicants would be prohibited from applying for the same hunt again during their lifetime; however it is not clear if this restriction is intended to apply only to nonresidents or to residents as well, based on the proposal’s issue statement.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

This proposal only changes the allocation of drawing hunt opportunity in Unit 13D. All other drawing hunts for sheep in Region IV already have a 10% permit allocation for nonresidents. Limiting nonresident hunting opportunity in Unit 13D drawing hunts may increase the number of legal rams available to residents, but the extent to which this might occur is unknown. Hunting opportunity for both residents and nonresidents was reduced in Unit 13D in 2007 to reduce “hunter crowding”, reducing the number of hunters by 76%.

Table 117-1. Unit 13D, Taz West, Dall sheep hunt and harvest statistics, regulatory years 2005 through 2014.

Regulatory Year	Total Permits	Total Hunters	Total Harvest	Residents Success	Nonresident Success
2005	GS000	50	21	19%	88%
2006	GS000	43	10	7%	57%
2007	GS000	47	13	9%	77%
2008	8 R, 2 NR	6	3	40%	25%
2009	8 R, 2 NR	6	2	40%	25%
2010	8 R, 2 NR	6	3	25%	40%
2011	8 R, 2 NR	9	4	33%	67%
2012	10 R, 2 NR	11	8	67%	100%
2013	13R, 3 NR	13	6	45%	50%
2014	13R,3NR	10	2	0%	100%

Table 117-2. Unit 13D, Taz East, Dall sheep hunt and harvest statistics, regulatory years 2005 through 2014

Regulatory Year	Total Permits	Total Hunters	Total Harvest	Residents Success	Nonresident Success
2005	GS000	87	25	19%	60%
2006	GS000	60	16	19%	44%
2007	GS000	96	18	9%	60%
2008	33 R, 8 NR	23	3	5%	40%
2009	33 R, 8 NR	22	10	29%	75%
2010	33 R, 8 NR	26	13	41%	100%
2011	33 R, 8 NR	32	19	46%	100%
2012	40 R, 10 NR	38	11	14%	88%
2013	40 R,10 NR	24	8	19%	63%
2014	20 R, 5 NR	10	9	60%	100%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of harvests between resident and nonresident sheep hunters.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 118 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Jake Sprankle

WHAT WOULD THE PROPOSAL DO? This proposal would liberalize the resident sheep hunting seasons in Units 9, 11, 13, 14, and 16 by allowing residents to hunt sheep 7 days prior to season openings for nonresidents. In units with a split season, the second half of the sheep hunting season would be reduced for nonresidents by delaying the opening by 7 days.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram

- Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain ranges and hunt areas:
 - Alaska Range Units 13B, 13E, and 16
 - Aleutian Range Unit 9
 - Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
 - Talkeetna Mountains Units 13A, 13E, 14A, and 14B
 - Wrangell Mountains Unit 11

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 11; amount reasonably necessary for subsistence = 60–75 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the sheep hunting seasons for resident hunters in Units 9, 11, 13, 14, and 16 would begin on August 3 (August 3–September 20) for all hunts that do not have a split season. Sheep hunting seasons for resident hunters in Units 14A and 13B drawing hunts would be August 3–25 or August 26–September 20, and the seasons for nonresident hunters would be August 10–25 and September 3–20.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

This proposal is not likely to affect sheep populations because the current full-curl bag limit adequately guards against overharvest, at least in most cases. Increasing resident hunting opportunity will increase

resident hunter success and reduce the number of legal rams remaining in the population at the end of the hunting season.

During 2004–2013, 86% of sheep hunters throughout the region were residents who took 62% of the harvest (average success = 16%). Nonresidents took 38% of the harvest (average success = 57%).

Table 118-1. Sheep hunting statistics for all sheep hunts in Region IV, regulatory years 2004 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	179	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%
Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	61	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of harvests between resident and nonresident sheep hunters. Because most areas are managed with a full-curl bag limit or with a drawing permit for any ram, the additional hunting opportunity is not expected to increase harvest beyond what is sustainable for the sheep populations. Increasing resident hunting opportunity will increase resident hunter success and reduce the number of legal rams remaining in the population at the end of the hunting season.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 119 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Tom Lamal

WHAT WOULD THE PROPOSAL DO? This proposal would liberalize the resident sheep hunting seasons in Units 9, 11, 13, 14, and 16 by allowing residents to hunt sheep 7 days prior to season openings for nonresidents.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain ranges and hunt areas:
 - Alaska Range Units 13B, 13E, and 16
 - Aleutian Range Unit 9
 - Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
 - Talkeetna Mountains Units 13A, 13E, 14A, and 14B
 - Wrangell Mountains Unit 11

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 11; amount reasonably necessary for subsistence = 60–75 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the sheep hunting seasons for resident hunters in Units 9, 11, 13, 14, and 16 would begin on August 3 (August 3–September 20) for all hunts. This proposal also eliminates the split season for drawing hunts in Units 14A and 13B.

BACKGROUND: This proposal is not likely to affect sheep populations because the current full-curl bag limit adequately guards against overharvest, at least in most cases. Increasing resident hunting

opportunity will increase resident hunter success and reduce the number of legal rams remaining in the population at the end of the hunting season.

During 2004–2013, 86% of sheep hunters throughout the region were residents who took 62% of the harvest (average success = 16%). Nonresidents took 38% of the harvest (average success = 57%).

Table 119-1. Sheep hunting statistics for all sheep hunts in Region IV, regulatory years 2004 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	179	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%
Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	61	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of harvests between resident and nonresident sheep hunters. Because most areas are managed with a full-curl bag limit or with a drawing permit for any ram, the additional hunting opportunity is not expected to increase harvest beyond what is sustainable for the sheep populations. Increasing resident hunting opportunity will increase resident hunter success and reduce the number of legal rams remaining in the population at the end of the hunting season.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 120 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: The Alaska Bowhunters Association

WHAT WOULD THE PROPOSAL DO? This proposal would establish an archery-only season from August 1–10 for sheep hunting in Units 9, 11, 13, 14A, 14B, and 16 in areas that are open to general season hunting with a harvest ticket.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10 - 25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain ranges and hunt areas:
 - Alaska Range Units 13B, 13E, and 16
 - Aleutian Range Unit 9
 - Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
 - Talkeetna Mountains Units 13A, 13E, 14A, and 14B
 - Wrangell Mountains Unit 11

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 11; amount reasonably necessary for subsistence = 60–75 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal allocates sheep hunting opportunity to bow hunters by creating an archery-only season. The new season would only occur in areas that are open to sheep hunting with a sheep harvest ticket.

BACKGROUND: This proposal is not likely to affect sheep populations because the current full-curl bag limit adequately guards against overharvest, at least in most cases. Allocating additional hunting

opportunity could increase sheep harvests, but it is difficult to predict how many resident hunters will participate in the hunt and how successful they will be.

Table 120-1. Sheep hunting statistics for all sheep hunts in Region IV, regulatory years 2004 through 2013.

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	179	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%
Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	61	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

DEPARTMENT COMMENTS: **DEPARTMENT COMMENTS:** The department is **NEUTRAL** on the allocation of harvests to resident bow hunters. Because most areas are managed with a full-curl bag limit or with a drawing permit for any ram, the additional hunting opportunity is not expected to increase harvest beyond what is sustainable for the sheep populations.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 41.)

PROPOSAL 121 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Jake Sprinkle

WHAT WOULD THE PROPOSAL DO? Open the resident sheep season 7 days before the nonresident season in the Interior Region (Units 12, 19, 20, 24, 25, 26B, and 26C).

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts

- Delta Controlled Use Area (portions of Units 20D, 20A and 13B)

- residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram.
- Nonresidents are limited to 10% of permits.
- 120 permits in 2015
- Tok Management Area (Unit 12 and portions of Units 13C and 20D)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram every 4 years.
 - Nonresidents are limited to 10% of permits.
 - 60 permits in 2015
- Mount Harper (portions of Units 20D and 20E)
 - residents and nonresidents — August 10–September 20, one full-curl ram.
 - 4 permits annually. The board has not specified an allocation of these 4 permits between residents and nonresidents.

Registration Permit Hunts

- Unit 19C
 - residents only — October 1–April 30, one sheep with three-quarter curl or smaller; excluding rams with both tips broken (broomed), lambs and ewes with lambs.
- Unit 26C and that portion of Unit 25A east of Middle Fork Chandalar River, excluding the federally designated Arctic Village Sheep Management Area
 - residents only — October 1–April 30, 3 sheep, access restrictions apply.

General Season Hunts

- Unit 24B, John River drainage upstream from Till Creek, and in the Glacier River Drainage
 - residents only — August 1–April 30, 3 sheep.
- Remainder of Units 12, 19, 20, 24, 25, 26B and 26C
 - residents and nonresidents — August 10–September 20, one full-curl ram.
- No sheep hunting opportunity exists in Unit 21.

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 19; amount reasonably necessary for subsistence = 1–5 sheep.
- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Resident sheep seasons would begin on 3 August, 7 days before nonresident seasons. In split-season drawing hunts, the second nonresident season would start later so that residents also begin the second season 7 days before nonresidents.

BACKGROUND: This proposal would provide more opportunity for Alaska residents than nonresidents in cases where there is a positive customary and traditional (C&T) use finding for sheep (all or portions of Units 19, 20, 24, 25, and 26). Providing a longer resident season is used to separate resident and nonresident hunters in some Region III moose hunts, as well as to provide for C&T uses pursuant to the state subsistence priority law. However, it may lengthen the overall period of crowding by creating two opening dates. A lengthened season could increase harvests and increase the complexity of state sheep hunting regulations. Nonresident hunters and guides may feel disadvantaged by an early opening for resident hunters.

Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the previous 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

The requirement to harvest full-curl rams should prevent over-harvest from affecting sustainability of sheep populations. Lengthening the resident season is not likely to adversely affect sheep populations in the short term, even if general season harvest increases. However, there may be a perceived scarcity of legal rams in heavily hunted areas. Over time, it could reduce the ability of both residents and nonresidents to harvest a big ram, or increase the effort required to harvest a ram; but the extent that this might occur is unknown.

Region III sheep hunters are predominantly residents, who take a majority of the rams harvested. During 1981–2010, residents made up 75% of all (general season and drawing permit) sheep hunters and took 59% of the harvest. The number of nonresident hunters increased slowly throughout 1981–1996. At the same time, resident hunter numbers increased dramatically during the 1980s and declined sharply in the early 1990s. The proportional take by residents declined and stabilized at 56% of the overall harvest (drawing and general season) during 2004–2013, while resident sheep hunters continued to make up 75% (range = 72%–78%) of all sheep hunters in the region.

In general season hunts, fewer residents hunted sheep when harvests declined in the early 1990s, whereas nonresidents changed their behavior very little. Residents took, on average, 60% of the general season harvest during 1981–1996 and 50% in 2004–2013. Resident take increased slightly to 52% of the general season harvest during 2008–2013, due to increasing numbers of resident hunters (average = 923 residents) and a slight decrease in numbers of nonresident hunters (average = 386 nonresidents).

In drawing hunts, competition among hunters is controlled by the number of permits available. In the Tok Management Area and the Delta Controlled Use Area, nonresidents are limited to 10% of available permits.

In the registration hunts in the Interior, the hunts take place in the winter and are restricted to residents only. The board may wish to consider those season dates separately from drawing and general season hunts.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 42.)

PROPOSAL 122 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Tom Lamal

WHAT WOULD THE PROPOSAL DO? Open the resident sheep season 7 days before the nonresident season in the Interior Region (Units 12, 19, 20, 24, 25, 26B, and 26C).

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts

- Delta Controlled Use Area (portions of Units 20D, 20A and 13B)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram.
 - Nonresidents are limited to 10% of permits.
 - 120 permits in 2015
- Tok Management Area (Unit 12 and portions of Units 13C and 20D)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram every 4 years.
 - Nonresidents are limited to 10% of permits.
 - 60 permits in 2015
- Mount Harper (portions of Units 20D and 20E)
 - residents and nonresidents — August 10–September 20, one full-curl ram.
 - 4 permits annually. The board has not specified an allocation of these 4 permits between residents and nonresidents.

Registration Permit Hunts

- Unit 19C
 - residents only — October 1–April 30, one sheep with three-quarter curl or smaller; excluding rams with both tips broken (broomed), lambs and ewes with lambs.
- Unit 26C and that portion of Unit 25A east of Middle Fork Chandalar River, excluding the federally designated Arctic Village Sheep Management Area
 - residents only — October 1–April 30, 3 sheep, access restrictions apply.

General Season Hunts

- Unit 24B, John River drainage upstream from Till Creek, and in the Glacier River Drainage
 - residents only — August 1–April 30, 3 sheep.
- Remainder of Units 12, 19, 20, 24, 25, 26B and 26C
 - residents and nonresidents — August 10–September 20, one full-curl ram.
- No sheep hunting opportunity exists in Unit 21.

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 19; amount reasonably necessary for subsistence = 1–5 sheep.
- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Sheep hunting season dates in Region III would change to:

- Alaska residents: August 3– September 20
- Nonresidents: August 12 – September 20

BACKGROUND: This proposal attempts to reduce crowding during the first part of the sheep season by providing resident hunters with an earlier opening date. It would provide more opportunity for Alaska residents than nonresidents in cases where there is a positive customary and traditional (C&T) use finding for sheep (all or portions of Units 19, 20, 24, 25, and 26). Providing a longer resident season is used to separate resident and nonresident hunters in some Region III moose hunts, as well as to provide for C&T uses pursuant to the state subsistence priority law. A lengthened season could increase harvests and increase the complexity of state sheep hunting regulations. Nonresident hunters and guides may feel disadvantaged by an early opening for resident hunters.

Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

The requirement to harvest full-curl rams should prevent over-harvest from affecting sustainability of sheep populations. Lengthening the resident season is not likely to adversely affect sheep populations in the short term, even if general season harvest increases. However, there may be a perceived scarcity of legal rams in heavily hunted areas. Over time, it could reduce the ability of both residents and nonresidents to harvest a big ram, or increase the effort required to harvest a ram; but the extent that this might occur is unknown.

Region III sheep hunters are predominantly residents, who take a majority of the rams harvested. During 1981–2010, residents made up 75% of all (general season and drawing permit) sheep hunters and took 59% of the harvest. The number of nonresident hunters increased slowly throughout 1981–1996. At the same time, resident hunter numbers increased dramatically during the 1980s and declined sharply in the early 1990s. The proportional take by residents declined and stabilized at 56% of the overall harvest (drawing and general season) during 2004–2013, while resident sheep hunters continued to make up 75% (range = 72%–78%) of all sheep hunters in the region.

In general season hunts, fewer residents hunted sheep when harvests declined in the early 1990s, whereas nonresidents changed their behavior very little. Residents took, on average, 60% of the general season harvest during 1981–1996 and 50% in 2004–2013. Resident take increased slightly to 52% of the general season harvest during 2008–2013, due to increasing numbers of resident hunters (average = 923 residents) and a slight decrease in numbers of nonresident hunters (average = 386 nonresidents).

In drawing hunts, competition among hunters is controlled by the number of permits available. In the Tok Management Area and the Delta Controlled Use Area, nonresidents are limited to 10% of available permits.

In the registration hunts in the Interior, the hunts take place in the winter and are restricted to residents only. The board may wish to consider those season dates separately from drawing and general season hunts.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 43.)

PROPOSAL 123 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Leonard Jewkes

WHAT WOULD THE PROPOSAL DO? Open the resident sheep season 10 days before the nonresident season in the Interior Region (Units 12, 19, 20, 24, 25, 26B, and 26C).

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts

- Delta Controlled Use Area (portions of Units 20D, 20A and 13B)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram.
 - Nonresidents are limited to 10% of permits.
 - 120 permits in 2015
- Tok Management Area (Unit 12 and portions of Units 13C and 20D)
 - residents and nonresidents — August 10–25 or August 26–September 20, one full-curl ram every 4 years.
 - Nonresidents are limited to 10% of permits.
 - 60 permits in 2015
- Mount Harper (portions of Units 20D and 20E)
 - residents and nonresidents — August 10–September 20, one full-curl ram.
 - 4 permits annually. The board has not specified an allocation of these 4 permits between residents and nonresidents.

Registration Permit Hunts

- Unit 19C
 - residents only — October 1–April 30, one sheep with three-quarter curl or smaller; excluding rams with both tips broken (broomed), lambs and ewes with lambs.
- Unit 26C and that portion of Unit 25A east of Middle Fork Chandalar River, excluding the federally designated Arctic Village Sheep Management Area
 - residents only — October 1–April 30, 3 sheep, access restrictions apply.

General Season Hunts

- Unit 24B, John River drainage upstream from Till Creek, and in the Glacier River Drainage
 - residents only — August 1–April 30, 3 sheep.
- Remainder of Units 12, 19, 20, 24, 25, 26B and 26C
 - residents and nonresidents — August 10–September 20, one full-curl ram.
- No sheep hunting opportunity exists in Unit 21.

Subsistence Law

- Positive customary and traditional use finding for sheep in all of Unit 19; amount reasonably necessary for subsistence = 1–5 sheep.
- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Sheep hunting season dates in Region III would change to:

- Alaska residents: August 1 – September 20
- Nonresidents: August 10 – September 20

BACKGROUND: This proposal attempts to reduce crowding during the first part of the sheep season by providing resident hunters with an earlier opening date. It would provide more opportunity for Alaska residents than nonresidents in cases where there is a positive customary and traditional (C&T) use finding for sheep (all or portions of Units 19, 20, 24, 25, and 26). Providing a longer resident season is used to separate resident and nonresident hunters in some Region III moose hunts, as well as to provide for C&T uses pursuant to the state subsistence priority law. A lengthened season could increase harvests and increase the complexity of state sheep hunting regulations. Nonresident hunters and guides may feel disadvantaged by an early opening for resident hunters.

Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

The requirement to harvest full-curl rams should prevent over-harvest from affecting sustainability of sheep populations. Lengthening the resident season is not likely to adversely affect sheep populations in the short term, even if general season harvest increases. However, there may be a perceived scarcity of legal rams in heavily hunted areas. Over time, it could reduce the ability of both residents and nonresidents to harvest a big ram, or increase the effort required to harvest a ram; but the extent that this might occur is unknown.

Region III sheep hunters are predominantly residents, who take a majority of the rams harvested. During 1981–2010, residents made up 75% of all (general season and drawing permit) sheep hunters and took 59% of the harvest. The number of nonresident hunters increased slowly throughout 1981–1996. At the same time, resident hunter numbers increased dramatically during the 1980s and declined sharply in the early 1990s. The proportional take by residents declined and stabilized at 56% of the overall harvest (drawing and general season) during 2004–2013, while the proportion of resident sheep hunters remained consistent at 75% (range = 72%–78%).

In general season hunts, fewer residents hunted sheep when harvests declined in the early 1990s, whereas nonresidents changed their behavior very little. Residents took, on average, 60% of the general season harvest during 1981–1996 and 50% in 2004–2013. Resident take increased slightly to 52% of the general season harvest during 2008–2013, due to increasing numbers of resident hunters (average = 923 residents) and a slight decrease in numbers of nonresident hunters (average = 386 nonresidents).

In drawing hunts, competition among hunters is controlled by the number of permits available. In the Tok Management Area and the Delta Controlled Use Area, nonresidents are limited to 10% of available permits.

In the registration hunts in the Interior, the hunts take place in the winter and are restricted to residents only. The board may wish to consider those season dates separately from drawing and general season hunts.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

(The Board of Game deferred this proposal from the 2014 Interior Region meeting. It was previously listed as proposal 49.)

PROPOSAL 124 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

PROPOSED BY: Chris Gossen

WHAT WOULD THE PROPOSAL DO? Open the resident sheep season 7 days before the nonresident season in Units 25 and 26.

WHAT ARE THE CURRENT REGULATIONS?

Unit 25 —

Residents

- general season (Aug 10–Sept 20, full-curl ram)
- registration (Oct 1–Apr 30, 3 sheep, east of the Middle Fork of the Chandalar River)

Nonresidents

- general season (Aug 10–Sept 20, full-curl ram)

Unit 26A —

Residents

- general season (Aug 10–Sept 20, full-curl ram)
- registration (Aug 10–Apr 30 for 1 sheep or Aug 1–Apr 30 for 3 sheep, depending on the area)

Nonresidents

- general season (Aug 10–Sept 20, full-curl ram)

Unit 26B —

Residents and Nonresidents

- general season (Aug 10–Sept 20, full-curl ram)

Unit 26C —

Residents

- general season (Aug 10–Sept 20, full-curl ram)
- registration (Oct 1–Apr 30, 3 sheep, east of the Middle Fork of the Chandalar River)

Nonresidents

- general season (Aug 10–Sept 20, full-curl ram)

Subsistence Law

- Positive customary and traditional use finding for sheep in the DeLong Mountains (all of Unit 23 and that portion of 26A west of the Etivluk River); amount reasonably necessary for subsistence = 0–9 sheep.
- Positive customary and traditional use finding for sheep in the Schwatka Mountains (all of Unit 23 and that portion of 26A east of the Etivluk River); amount reasonably necessary for subsistence = 2–4 sheep.
- Positive customary and traditional use finding for sheep in the Brooks Range (all of units 23, 24, 25A, and 26); amount reasonably necessary for subsistence = 75–125 sheep.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Resident sheep hunting seasons in Units 25 and 26 would open 7 days before the nonresident seasons. Exact dates are not specified.

BACKGROUND: This proposal attempts to reduce competition during the first part of the sheep season by providing resident hunters with an earlier opening date. Providing a longer resident season is used to separate resident and nonresident hunters in some Region III moose hunts, as well as to provide for C&T uses pursuant to the state subsistence priority law. A lengthened season could increase harvests and increase the complexity of state sheep hunting regulations. Nonresident hunters and guides may feel disadvantaged by an early opening for resident hunters.

Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for broad changes in allocation of sheep hunting opportunity have been discussed previously by the board at meetings covering Regions III, IV, and V.

The requirement to harvest full-curl rams should prevent over-harvest from affecting sustainability of sheep populations. The registration hunt in Units 25 and 26 takes place in the winter and is restricted to residents only. The 2004-2013 harvest for this registration hunt averaged 1 sheep per year, and had no effect on the sheep population in this area.

Lengthening the resident season is not likely to adversely affect sheep populations in the short term, even if general season harvest increases. However, there may be a perceived scarcity of legal rams in heavily hunted areas. Over time, it could reduce the ability of both residents and nonresidents to harvest a big ram, or increase the effort required to harvest a ram; but the extent that this might occur is unknown.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this issue of allocation between resident and nonresident hunters. This proposal closely mirrors similar proposals regarding sheep hunter allocation throughout Alaska.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

PROPOSAL 125 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Bowhunters Association

WHAT WOULD THE PROPOSAL DO? This proposal would create an archery-only season for moose in Units 11, 13, 14A, 14B, 16, and 17. The new season would be 7 days long and it would occur after the close of the general season moose hunt in each respective area.

WHAT ARE THE CURRENT REGULATIONS? The following is a list of the general season moose hunt season dates for Units 11, 13, 14A, 14B, 16, and 17:

- | | |
|---|------------------------|
| • Unit 11, East of the copper River and upstream from and east of the Slana River | August 20–September 17 |
| • Remainder of Unit 11 | August 20–September 20 |
| • Unit 13: | September 1–20 |
| • Unit 14A and 14B | August 25–September 25 |
| • Unit 16 | August 20–September 25 |
| • Unit 17A: | August 25–September 20 |
| • Units 17B and 17C: | September 1–15 |

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal allocates moose hunting opportunity to bow hunters in Units 11, 13, 14A, 14B, 16, and 17 by establishing a late-season, archery-only hunt that occurs after the general season hunt closes in each respective area. The department anticipates an increase in harvest if this proposal is adopted because the hunt will occur closer to the rut when bulls are more susceptible to harvest.

BACKGROUND: The status of moose populations in Region IV varies throughout the region, as do the season dates for the general season moose hunts and availability of alternate hunting opportunities for residents, including community subsistence hunts and Tier II hunts. In each case, the current regulations were adopted by the board after careful consideration of the biological and social factors affecting each hunt area.

The department has not been able to conduct fall surveys to estimate population sizes and bull:cow ratios in some of the areas affected by this proposal. Fall moose surveys in southwestern Alaska (Units 9 and 17) have been particularly problematic over the past 10 years due to the lack of adequate snow cover. Surveys conducted in more accessible areas (Units 13 and 14) indicate that the moose populations are near the management objective for bull:cow ratios. More remote areas (portions of Unit 13, Unit 11, and Unit 16) that are difficult to access may provide additional opportunity.

There are positive customary and traditional use findings for moose populations in units 11, 13, 16B, and 17, with varying amounts reasonably necessary for subsistence. The board should determine if adoption of this proposal continues to provide reasonable opportunity for subsistence uses of moose in those units.

Units 14A and 14B are in the Anchorage–Mat-Su–Kenai Peninsula Nonsubsistence Area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity to bow hunters, but is **OPPOSED** to the adoption of regulations that would increase harvests in Units 13, 14A, 14B, and 17 due to concerns for the moose populations in these areas. If this proposal is adopted for these units, the department recommends reducing opportunity offered by other regulations, subject to the preference for subsistence uses, to keep the harvests within sustainable limits.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 126 – 5 AAC 92.015. Brown bear tag fee exemptions.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? This proposal will reauthorize the brown bear tag fee exemptions in Units 9, 11, 13, 16, and 17.

WHAT ARE THE CURRENT REGULATIONS? The following regulations are currently in effect for Region IV brown bear hunts:

5AAC 92.015. Brown bear tag fee exemption

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

(1) Unit 11;

(2) Units 13 and 16(A);

(3) Unit 16(B) and 17;

...

(11) Unit 9, within the following areas, unless a smaller area is defined by the department in an applicable permit:

(A) Unit 9(B), within five miles of the communities of Port Alsworth, Nondalton, Iliamna, Newhalen, Pile Bay, Pedro Bay, Pope Vanoy Landing, Kakhonak, Igiugig, and Levelock;

(B) Unit 9(C), within five miles of the communities of King Salmon, Naknek, and South Naknek;

(C) Unit 9(D), within five miles of the communities of Cold Bay, King Cove, Sand Point, and Nelson Lagoon;

(D) Unit 9(E), within five miles of the communities of Egegik, Pilot Point, Ugashik, Port Heiden, Port Moller, Chignik Lake, Chignik Lagoon, Chignik Bay, Perryville, and Ivanof Bay;

(12) Unit 10, within three miles of the community of False Pass, unless a smaller area is defined by the department in an applicable permit.

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

(1) Unit 9(B);

(2) Unit 9(E), that portion including all drainages that drain into the Pacific Ocean between Cape Kumliun and the border of Unit 9(D) and Unit 9(E);

(3) Unit 17;

...

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

Hunters will not be required to purchase a brown bear locking tag before hunting brown bears in Units 11, 13, 16, and 17. In addition, brown bear tag fees will not be required for subsistence hunts in Units 9 and 17 or for permit hunts near communities in Unit 9.

BACKGROUND: Brown bear tag fee exemptions must be reauthorized annually or the fee will be automatically reinstated.

General Season Hunts: The Board liberalized brown bear hunting regulations, including the tag fee exemption, to increase the opportunity to take brown bears in Units 11, 13, and 16 during the March 2003 Board of Game meeting and in Unit 17 during the March 2011 Board of Game meeting. The tag fee exemption in these Units provides greater opportunity to harvest brown bears by allowing opportunistic take.

The Board also exempted brown bear tag fees for bear hunts near communities in Unit 9 to address public safety concerns in communities during the board meeting in March 2011. Brown bears are abundant in Unit 9 and are managed as a trophy species. Brown bears are frequently observed in communities destroying property in search of food or garbage and occasionally killing pets. The liberalized bear seasons and bag limits along with the elimination of the tag fee is intended to allow people to take bears before they destroy property, to promote a greater acceptance of the unit's bear population, and to resolve some of the compliance issues associated with the take of DLP bears.

Subsistence Brown Bear Hunts: The Board waived the brown bear tag fee requirement for subsistence brown bear hunts in Unit 17 and portions of Unit 9. Subsistence brown bear harvest rates are low and well within sustainable limits. Exempting the resident tag fee has not caused an increase in subsistence harvest in these units. Continuation of the exemption accommodates cultural and traditional uses of brown bears in these units and provides an alternative for hunters who take brown bears primarily for their meat.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because it provides greater harvest opportunity in Units 11, 13, 16, and 17; addresses public safety concerns in Unit 9; and provides subsistence harvest opportunity in portions of Unit 9 and Unit 17.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 127 – 5 AAC 92.220. Salvage of game meat, furs, and hides.

PROPOSED BY: Anchorage Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would remove the meat salvage requirement for brown bear taken over bait in Region IV.

WHAT ARE THE CURRENT REGULATIONS? The meat salvage requirement for bears includes the meat of the front and hind quarters and meat along the backbone (backstrap).

Brown bear baiting is currently authorized in Units 13D and in Unit 16.

- Season: April 15–June 30
- Salvage requirement: Hide, skull, and all edible meat

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted hunters would no longer be required to salvage the edible meat from brown bears taken over bait in Region IV

BACKGROUND: In the Central/Southwest Region Units brown bear baiting is currently allowed in Unit 13D and Unit 16. The take of brown bears at bait sites was authorized in these areas at the February 2013 Board of Game meeting in Wasilla.

Salvage requirements for brown bears taken over bait are currently aligned across the state. At the February 2014 Interior Region meeting there were 3 proposals to remove the salvage requirement in those units, and the board deferred them to the March 2014 Statewide meeting because it was a statewide issue. Also at the March 2014 Statewide meeting was a proposal to remove the salvage requirement for brown bears taken over bait at a statewide level. The proposal to remove the salvage requirement at the statewide level failed and the requirement was retained. Due to that action, there was no action taken on the three proposals deferred from the Interior meeting.

Twenty-six of the thirty-two brown bears were harvested over bait during the spring season in regulatory year 2013 in Unit 13D (Table 127-1).

Table 127-1. Chronology of brown bear harvest in Unit 13D, regulatory years 2009 through 2013.

	Fall	Spring	Total
2009	18	5	23
2010	16	11	27
2011	11	10	21
2012	13	12	25
2013 ^a	23	32	55

^aFirst year of spring brown bear take over bait; 26 brown bears taken over bait.

Table 127-2. Chronology of brown bear harvest in Unit 16, regulatory years 2010 through 2013^a.

	Fall	Spring	Total
2010	93	26	119
2011	63	36	99
2012	36	42	78
2013	47	37	84

^aHarvest does not include bears removed by Department or through predation control.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the modification of a statewide regulation on a region-by-region basis because it misaligns bear salvage requirements with other parts of the state. Removing the requirement is not expected to affect hunter participation in brown bear baiting or increase brown bear harvest. As a result, the proposed changes do not present a biological concern for brown bear populations in the region.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 128 – 5 AAC 92.220. Salvage of game meat, furs, and hides.

PROPOSED BY: Joel Doner

WHAT WOULD THE PROPOSAL DO? This proposal would remove the meat salvage requirement for brown bear taken over bait in Region IV. The proposal also requests that salvage requirements be aligned with black bears, which requires meat salvage in the spring.

WHAT ARE THE CURRENT REGULATIONS? The meat salvage requirement for bears includes the meat of the front and hind quarters and meat along the backbone (backstrap).

Brown bear baiting is currently authorized in Units 13D and in Unit 16.

- Season: April 15–June 30
- Salvage requirement: Hide, skull, and all edible meat

Black bear baiting

- Unit 13D
 - Season: April 15–June 30
 - Salvage requirement: All edible meat
- Unit 16 predator control area
 - Season: April 15–June 30 and July 1–October 15
 - Spring salvage requirement: Hide, skull and all edible meat
 - Fall salvage requirement: Skull and all edible meat OR hide only

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Because the proposal requests the removal of the meat salvage requirement for brown bear and the alignment of salvage requirements with black bear, it is unclear what the intended outcome of this proposal would be. Meat salvage requirements for brown bear taken over bait are currently aligned with the meat salvage requirements for black bear baiting during the spring, when brown bear baiting is authorized to occur.

If the intent of the proposal is to remove the brown bear meat salvage requirement and align the remaining salvage requirements for brown bear taken over bait with black bear salvage requirements, there would be no salvage requirements remaining for brown bears taken over bait in Unit 13D. Salvage of the hide and skull is not required for black bear taken over bait during the spring season in Unit 13D.

BACKGROUND: In the Central/Southwest Region Units brown bear baiting is currently allowed in Unit 13D and Unit 16. The take of brown bears at bait sites was authorized in these areas at the February 2013 Board of Game meeting in Wasilla.

Salvage requirements for brown bears taken over bait are currently aligned across the state. At the February 2014 Interior Region meeting there were 3 proposals to remove the salvage requirement in those units, and the board deferred them to the March 2014 Statewide meeting because it was a statewide issue. Also at the March 2014 Statewide meeting was a proposal to remove the salvage requirement for brown bears taken over bait at a statewide level. The proposal to remove the salvage requirement at the statewide level failed and the requirement was retained. Due to that action, there was no action taken on the three proposals deferred from the Interior meeting.

Twenty-six of the thirty-two brown bears were harvested over bait during the spring season in regulatory year 2013 in Unit 13D (Table 128-1).

Table 128-1. Chronology of brown bear harvest in Unit 13D, regulatory years 2009 through 2013.

Fall	Spring	Total
------	--------	-------

2009	18	5	23
2010	16	11	27
2011	11	10	21
2012	13	12	25
2013 ^a	23	32	55

^aFirst year of spring brown bear take over bait; 26 brown bears taken over bait.

Table 128-2. Chronology of brown bear harvest in Unit 16, regulatory years 2010 through 2013^a.

	Fall	Spring	Total
2010	93	26	119
2011	63	36	99
2012	36	42	78
2013	47	37	84

^a Harvest does not include bears removed by Department or through predation control.

DEPARTMENT COMMENTS: The department recommends **TAKING NO ACTION** on this proposal based on the actions taken on Proposal 127. The department is **OPPOSED** to the alignment of brown bear and black bear salvage requirements in Unit 13D, where the salvage of the hide and skull is not required for black bears. Salvage of the hide and skull of brown bears is needed to allow the department to collect biological information about the bears harvested during the sealing process.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 129 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

PROPOSED BY: John Frost

WHAT WOULD THE PROPOSAL DO? This proposal would remove the requirement to clean up contaminated soil from bear bait stations in Region IV.

WHAT ARE THE CURRENT REGULATIONS? 5AAC 92.044 (10) requires bear baiting permittees to remove bait, litter, and equipment from the bait station site when hunting activities are complete.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters would no longer be required to remove contaminated soil from bait stations.

BACKGROUND: The requirement to remove all soil contaminated by baiting at the end of the season is considered to be an excessive nuisance and a form of harassment by regulators to some members of the bear baiting community.

Grease poured onto the ground and spread at bear bait sites constitutes “bait” by definition. Bear baiting has strict regulations to ensure public safety and to ensure that bait stations do not continue to attract bears beyond the period when baiting is permitted. Contaminated soil can continue to serve as an attractant to bears after the season, thus falling under the legal definition of bait which must be removed from the site. Use of grease at a bait site can also kill vegetation and create unsightly “grease pits.”

DEPARTMENT COMMENTS: The department is **OPPOSED** to the adoption of this proposal at a regional Board of Game meeting because it is a statewide regulation, and adoption of the proposal would misalign and complicate the regulations currently in place. The requirement to clean up contaminated soil is a tool to ensure that bears are not attracted to a closed bait station.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 130 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

PROPOSED BY: Mat-Valley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? This proposal would allow same-day airborne (SDA) hunting of wolves and coyotes in Region IV when a person is at least 300 feet from the airplane.

WHAT ARE THE CURRENT REGULATIONS?

AS 16.05.783 (a) states that “a person may not shoot or assist in shooting a free-ranging wolf or wolverine the same day that a person has been airborne”. However, the Board of Game may authorize a predator control program that allows airborne or same day airborne shooting under conditions laid out in the statute.

5 AAC 92.085 (8). Unlawful methods of taking big game. This regulation prohibits the taking or assisting in taking big game until after 3:00 a.m. following the day in which the flying occurred. The exceptions to this regulation include a person flying on a regularly scheduled commercial airline, including a commuter airline.

5 AAC 92.095 (8). Unlawful methods of taking furbearers. This regulation prohibits a person from taking or assisting in taking wolf and wolverine until after 3:00 a.m. following the day in which the flying occurred. The regulation also prohibits the taking of coyote, arctic fox, or lynx unless that person is over 300 feet from the airplane at the time of taking.

5AAC 92.990 (5). Definitions. This regulation defines “big game” as black bear, brown bear, bison, caribou, Sitka black-tailed deer, elk, mountain goat, moose, muskox, Dall sheep, wolf and wolverine.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Adoption of this proposal would be a violation of AS 16.05.783 which prohibits the take of wolves SDA unless authorized by the board through a predator control program. Adopting this proposal would result in no changes to a hunter’s ability to take coyotes SDA because it is already authorized by current regulations, provided the person is more than 300 feet from the airplane before shooting.

BACKGROUND: The board has authorized the SDA harvest of wolves in predator control programs in Units 9, 13, 16, and 17. Each of these programs was established to reduce predation by wolves on moose or caribou populations that have been identified by the board as being important for high levels of consumptive use. The programs are designed to reduce the wolf population’s size and wolf predation while ensuring that the resulting wolf harvests are sustainable in each respective area. This is achieved by defining areas where SDA is allowed and establishing triggers for the wolf population that define when these activities can occur. Predator control areas are also limited in size to provide a refugia for wolves in

each game management unit to further protect the wolf populations and provide for sustained yield.

DEPARTMENT COMMENTS: The department's recommendation is to **TAKE NO ACTION** on this proposal because SDA hunting of wolves outside of a predator control program is prohibited by statute and thus is outside the board's authority. Additionally, SDA hunting of coyotes when a person is more than 300 feet from the airplane is already authorized by current regulations.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 132 – 5 AAC 92.010. Harvest tickets and reports.

PROPOSED BY: Sea Ducks Unlimited

WHAT WOULD THE PROPOSAL DO? This proposal would require the state to implement a mandatory reporting system (electronic and/or mail) for the harvest of migratory birds, by species, in Region IV.

WHAT ARE THE CURRENT REGULATIONS? Although no state codified definition exists, migratory game birds in Alaska are considered all waterfowl, cranes and snipe.

- AS 16.05.340 (17) (A). Waterfowl conservation tag. A person may not engage in waterfowl hunting without having the current year's waterfowl tag in the person's actual possession, unless that person (i) qualifies for a \$5 license fee under (6) of this subsection; (ii) is a resident under the age of 16; (iii) is 60 years of age or older and is a resident; (iv) is a disabled veteran eligible for a free Alaska hunting license under AS 16.05.341.
- 5 AAC 92.018 (1). Waterfowl conservation tag. A person required to possess an Alaska waterfowl conservation tag or "stamp" shall register in the Migratory Bird Harvest Information Program and carry proof of the registration while hunting migratory birds.
- State and federal stamps are not required when hunting only snipe and cranes, and snipe and crane hunters do not need to enroll in the Migratory Bird Harvest Information Program.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted this proposal would require the state to develop, implement, and enforce a mandatory reporting system (electronic and/or mail) for the harvest of migratory game birds, by species. Hunters would be required to report their hunting activities within 15 days of the close of the season, even if they did not hunt or harvest an animal. If ADF&G does not receive the harvest report, the hunter will be ineligible for future hunts.

BACKGROUND: Methods for estimating migratory game bird harvest and species composition have varied since early attempts by the United States Fish and Wildlife Service (USFWS) beginning in 1952. Many states also have long histories of conducting their own harvest surveys.

The State of Alaska conducted waterfowl harvest surveys from 1971–1997 using several methods. From 1971 - 1976 federal duck stamp data, a state mail questionnaire sent to all licensed hunters in Alaska, and limited hunter bag checks was used to estimate harvest. In 1982, sampling by mail was improved and hunter bag checks discontinued. Sampling was further improved in 1987, when mail-in questionnaires were assigned to purchasers of state duck stamps, thus focusing the state survey on waterfowl hunters

(eliminating the need to sample all Alaskan-licensed hunters), and improving collection of harvest location data. From 1988–1992, additional refinements were made to the survey.

The national Harvest Information Program (HIP) (50 CFR Part 20 § 20.20) was implemented in all states beginning with the 1998-99 migratory bird season and replaced the state harvest survey for species hunted in the fall. HIP was developed in recognition of long-standing problems with traditional state and federal surveys to assess nationwide harvest of migratory game birds, including inadequate sampling of migratory bird hunters; lack of information on non-waterfowl species (e.g., snipe, sandhill cranes, doves); lack of information on less frequently hunted species (e.g. sea ducks, brant); poor accuracy of harvest estimates; and differing survey methods among states, preventing consolidated flyway and national harvest estimates. Household surveys of spring waterfowl harvest are still being conducted.

DEPARTMENT COMMENTS: The department **OPPOSES** the adoption of a state regulation that would require the department to develop an additional reporting program to collect information on migratory bird hunting activities by species. Statewide harvest estimates and species composition for migratory game birds are currently provided to the state by the federal Harvest Information Program (harvest estimates) and Parts Collection Survey (species composition). Harvests from the spring hunt are also captured with a household survey.

With some exceptions (see **AS 16.05.340(17)(A)** and **5 AAC 92.018**, above), all persons that hunt waterfowl in Alaska are required to buy an Alaska Waterfowl Conservation Tag (i.e., duck stamp). Hunters that buy a duck stamp are automatically enrolled in the HIP program. Harvest estimates for cranes and snipe are generated from surveys of waterfowl hunters. The HIP registration requirements include obtaining information on: (a) identity of migratory bird hunters by name, address, and date of birth; and (b) their previous-year activity and level of harvest for categories of migratory birds (e.g., ducks, geese, brant, sea ducks cranes, snipe). Registration data gathered by the states are used by USFWS to conduct a stratified harvest survey from a sample of hunters to produce harvest estimates for migratory bird groups.

Implementing a statewide harvest survey for migratory birds would be redundant, costly, and unnecessary while the HIP program is in place.

The HIP survey generates the best harvest estimates at the state level, and lacks resolution for less commonly hunted species (sea ducks, cranes). Generally this is not critical since the state manages waterfowl hunting on a large geographic scale (zones), and migratory bird regulations are primarily designed to address population level goals over broad geographic areas, which is generally well-served by HIP. Granted, with the implementation of HIP, harvest estimates for migratory birds in Alaska are generally unavailable at the regional and local level for many species. At times this has affected the Department's ability to address board proposals to regulate localized harvest of sea ducks. However, there are cases where the state has implemented mandatory reporting for local harvest data collection. These include the Mendenhall Wetlands State Game Refuge registration permit (WU001), and Anchorage Coastal Wildlife Refuge registration permit (WU002). As necessary, the department or public is able to request more specific harvest reporting requirements through the board.

COST ANALYSIS: Adoption of this proposal would result in significant costs to the department in both staff time to develop and administer the program and costs of printing and mailing the harvest tickets and reports.

PROPOSAL 133 – 5 AAC 92.080. Unlawful taking of game; exceptions.

PROPOSED BY: Jake Sprankle.

WHAT WOULD THE PROPOSAL DO? This proposal would allow the use of felt soled waders and wading boots in Region IV.

WHAT ARE THE CURRENT REGULATIONS? The taking of game with the use of footgear with soles of felt, or other absorbent fiber material, is prohibited while wading in freshwater streams of Alaska.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Felt soled waders would be legal for wading in freshwater streams while hunting.

BACKGROUND: In 2012, the Board adopted regulations prohibiting the use of felt soled waders and wading boots to emulate regulations adopted by the Alaska Board of Fisheries in 2009. The prohibition on the use of felt soled wader and wading boots is an effort to reduce or prevent the introduction of invasive species and diseases to freshwater bodies in Alaska.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the adoption of this proposal because it changes a statewide regulation, and because the adoption of the proposal would misalign the regulations in Region IV with regulations in other parts of the state. The relationship between Alaska’s freshwater systems, fish, and wildlife is extensive and well documented. Negative impacts from invasive species and/or disease to freshwater systems will ultimately impact wildlife species in some manner. Adoption of this proposal may create confusion with fishers and hunters since prohibitions on felt soles will differ. If the board desires to remove the prohibition on felt soles, the department recommends that it be lifted statewide.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 134 – 5 AAC 92.003. Hunter education and orientation requirements.

PROPOSED BY: John Frost

WHAT WOULD THE PROPOSAL DO? This proposal would require the development and implementation of a crossbow hunter education program and certification.

WHAT ARE THE CURRENT REGULATIONS? There are currently no regulations requiring crossbow hunter education. Crossbows may be used in unrestricted weapons hunts throughout the State of Alaska as long as they meet the following requirements:

5 AAC 92.085 Unlawful methods of taking big game; exceptions

...

(15) with a crossbow, unless the

(A) bow peak draw weight is 100 pounds or more;

- (B) bow has a minimum draw length of 14 inches from front of bow to back of string when in the cocked position;
- (C) bolt is tipped with a broadhead and is a minimum of 16 inches in overall length and weighs at least 300 grains; and
- (D) Crossbow has no attached electronic devices, except for a scope or electronic sight that does not project light externally;

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

This proposal would require current and future crossbow hunters to successfully complete a crossbow hunter education course prior to hunting with a crossbow. In addition, adoption of this proposal would require the Department to develop and implement a new hunter education course.

BACKGROUND: There is an increasing interest in using crossbows for hunting in Alaska. As described above, currently there are no education and certification requirements for crossbow hunters, with the exception of methods and means exemption applicants who wish to use crossbows in archery only hunts. In these situations the department currently requires applicants to complete the online archery education course, crossbow specific workbook (“Today’s Crossbow”), and a proficiency shoot with a crossbow. As noted by the proposal author, crossbows are not a traditional bow and arrow and have equipment-specific safety concerns, function and shooting technique. Due to the increasing interest in the use of crossbows in the state and the differences from education programs for other hunting implements (e.g., firearms and archery) the development of a crossbow hunter education program and certificate may be warranted.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the adoption of this proposal for Region IV because it would misalign crossbow certification requirements with other parts of the state. This proposal has also been submitted for the Region II board meeting. Should the board wish to adopt this proposal the department would recommend implementing the requirement statewide, and asks that the board consider deferring the proposal until the next statewide board meeting (Cycle “B” 2016).

The Hunter information and Training Program (HIT) has been discussing the addition of crossbow education over the last year. These discussions have led HIT to focus on an online course with a field day only, and participants would provide their own crossbow for use in class and the proficiency shoot. In addition, should this proposal be adopted the department would need two years before implementation in order to develop the education program (est. 6–8 months), train HIT staff and volunteers, and offer courses for interested hunters prior to the effective date of the requirement.

COST ANALYSIS: Adoption of this proposal would result in significant costs to the department due to the staff time needed to develop and administer this program.

PROPOSAL 135 – 5 AAC Chapter 85. Seasons and bag limits.

PROPOSED BY: Kevin Secor

WHAT WOULD THE PROPOSAL DO? This proposal allocates hunting opportunity by adding 5 days to all resident hunting seasons in Region IV that require the use a general season harvest ticket and allocating 75% of the permits issued for drawing hunts to residents.

WHAT ARE THE CURRENT REGULATIONS? Please refer to the regulations in the entirety of chapters 85 and 92 of the Alaska Administrative Code (or as summarized in the 2014-2015 Alaska

Hunting Regulations and permit supplements) for a complete listing of all big game hunting regulations and permit conditions currently in effect for Game Management Units 11, 13, 14A, 14B, 16, and 17.

The only allocations in regulation for Region IV apply to sheep drawing hunts and are found in 5 AAC 92.057 (b). Special provisions for Dall sheep and mountain goat drawing permit hunts. The board has not allocated hunting opportunity for bison, brown bear, caribou, goat, or moose drawing hunts in Region IV.

Sheep drawing hunts in Region IV that are allocated in codified regulation:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? To adopt this proposal, the board would need to review all general season hunts with a resident and nonresident season to determine whether the 5 additional days of hunting opportunity for residents should be applied to the beginning or end of the season. If the resident seasons are liberalized, it is expected that harvest would increase. The board may need to reduce nonresident hunting opportunity to keep the harvest within sustainable limits for some populations.

The proposed 25% nonresident drawing permit allocation reduces resident hunting opportunity in all Region IV drawing hunts with the exception of the Unimak brown bear drawing permit hunts where nonresidents currently receive 42% of the permits issued.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident permit use over the past 10 years. This proposal would pertain to brown bear, bison, caribou, goat, moose, and sheep. There are no drawing permit hunts for black bears, wolves, or wolverine in the region.

There are 2 brown bear drawing permit hunts in Region IV. Both occur in Unit 10 and there is currently no set allocation between resident and nonresidents. During the past 10 years, 42% of the permits were issued to nonresidents.

Bison hunting in Region IV is available by drawing permit only. During the past 10 years an average of 23 permits were available annually. Nonresidents received 4% of permits. There is no limit on the allocation for nonresidents.

The only caribou hunting opportunity for nonresidents is in Unit 14B, which is managed with a drawing permit hunt. During the past 10 years, 6% of the permits were issued to nonresidents.

There are 3 goat drawing permit hunts in Region IV (1 in subunit 13D and 2 in subunit 14A) there is currently no set allocation between resident and nonresidents. During the past 10 years 19% of the permits in subunit 13D have been issued to nonresidents and 12% in subunit 14A.

There are 3 sheep drawing permit hunt areas in Region IV. The Board has previously established sheep hunting allocations for resident and nonresident hunters in portions of the Chugach Mountains in subunits 13D and 14A and for the Tok Management Area in subunit 13C. Establishing an allocation in the Delta Controlled Use Area portion of subunit 13B will be problematic in terms of meeting notice since this sheep population and hunt are shared with Region III.

There are 18 moose drawing permit hunts available in Region IV. Five hunts in Unit 13 and 1 hunt in Unit 17 are allocated exclusively to nonresidents, although resident opportunity is provided in each of these areas through general season, registration, and/or community subsistence hunts. Ten hunts in Unit 14A, and 2 hunts in Unit 16 are allocated exclusively to residents. There is also 1 hunt in Unit 13 for antlerless moose that is allocated exclusively to residents.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity between residents and nonresidents. Because this proposal applies to the entire region, the department recommends that the board review each of the affected hunts to determine if the proposed changes would be sustainable.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 136 – 5 AAC Chapter 85. Seasons and bag limits.

PROPOSED BY: Douglas Malone

WHAT WOULD THE PROPOSAL DO? The proposal allocates 90% of all drawing permits issued in Region IV for big game to residents and 10% to nonresidents. If a drawing hunt is undersubscribed by nonresidents, the remaining nonresident permits would be awarded to resident hunters.

WHAT ARE THE CURRENT REGULATIONS?

The only allocations in regulation for Region IV apply to sheep drawing hunts and are found in 5 AAC 92.057 (b). Special provisions for Dall sheep and mountain goat drawing permit hunts. The board has not allocated hunting opportunity for bison, brown bear, caribou, goat, or moose drawing hunts in Region IV.

Sheep drawing hunts in Region IV that are allocated in codified regulation:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)
 - Bag Limit: 1 ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the department would issue 90% of all drawing permits to residents and 10% to nonresidents. If hunts are undersubscribed by nonresidents, the unallocated permits would be issued to resident hunters.

The proposed change would increase the resident sheep permit allocation in Unit 13D from 80% to 90% and allocate additional hunting opportunity to residents for brown bear hunts in Unit 10 and goat hunts in Units 13 and 14. If adopted, resident hunting opportunity for bison hunts in Units 11 and 13 and the caribou hunt in Unit 14 would be reduced during years in which all of the permits are issued to nonresident hunters.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident permit use over the past 10 years. This proposal would pertain to brown bear, bison, caribou, goat, moose, and sheep. There are no drawing permit hunts for black bears, wolves, or wolverine in the region.

There are 2 brown bear drawing permit hunts in Region IV. Both occur in Unit 10 and are not currently allocated based on hunter residency. During the past 10 years, 42% of the permits were issued to nonresidents.

Bison hunting in Region IV is available by drawing permit only. During the past 10 years an average of 23 permits were available annually. Nonresidents received 4% of permits. There is no limit on the allocation for nonresidents.

The only caribou hunting opportunity for nonresidents is in Unit 14B, which is managed with a drawing permit hunt. During the past 10 years, 6% of the permits were issued to nonresidents.

There are 3 goat drawing permit hunts in Region IV (1 in subunit 13D and 2 in subunit 14A) that there are currently not allocated. During the past 10 years 19% of the permits in subunit 13D have been issued to nonresidents and 12% in subunit 14A.

There are 3 sheep drawing permit hunt areas in Region IV. The Board has previously established sheep hunting allocations for portions of the Chugach Mountains in subunits 13D and 14A and for the Tok Management Area in subunit 13C. Establishing an allocation in the Delta Controlled Use Area portion of subunit 13B will be problematic since this sheep population and hunt are shared with Region III.

There are 18 moose drawing permit hunts available in Region IV. Five hunts in Unit 13 and 1 hunt in Unit 17 are allocated exclusively to nonresidents, although resident opportunity is provided in each of these areas through general season, registration, and/or community subsistence hunts. Ten hunts in Unit 14A, and 2 hunts in Unit 16 are allocated exclusively to residents. There is also 1 hunt in Unit 13 for antlerless moose that is allocated exclusively to residents.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity between residents and nonresidents.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 137 – 5 AAC Chapter 85. Seasons and bag limits.

PROPOSED BY: Chris Gossen

WHAT WOULD THE PROPOSAL DO? This proposal would limit nonresidents to 10% of the sheep harvest in Region IV.

WHAT ARE THE CURRENT REGULATIONS?

Drawing Permit Hunts:

- Alaska Range
 - Unit 13B (Delta Controlled Use Area)
 - Bag limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
 - Unit 13C (Tok Management Area)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident
- Chugach Mountains
 - Unit 13D (Tazeast)
 - Bag Limit: 1 full-curl ram
 - Season: August 10–September 20
 - Allocation: 80% resident and 20% nonresident
 - Unit 13D (Tazwest)

- Bag Limit: 1 ram
- Season: August 10–September 20
- Allocation: 80% resident and 20% nonresident
- Unit 14A
 - Bag Limit: 1 ram
 - Season: August 10–25 or August 26–September 20
 - Allocation: 90% resident and 10% nonresident

General Season Hunts:

- Bag Limit: 1 full-curl ram
- Season: August 10–September 20
- Mountain Ranges and hunt areas:
 - Alaska Range Units 13B, 13E, and 16
 - Aleutian Range Unit 9
 - Chugach Mountains Unit 13D (Tonsina Controlled Use Area)
 - Talkeetna Mountains Units 13A, 13E, 14A, and 14B
 - Wrangell Mountains Unit 11

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If this proposal is adopted, the department would issue drawing permits to nonresidents with the goal of limiting the sheep harvest by nonresidents to 10% or less of the total harvest. Because there is no mechanism to restrict participation in general season hunts, the board would need to establish a drawing permit hunt structure for nonresident sheep hunters in the remainder of Region IV.

BACKGROUND: Board policy (2007-173-BOG) indicates that allocations for specific hunts will be decided individually, based upon historical patterns of nonresident and resident use over the past 10 years. The board can allocate hunting opportunity between resident and nonresident hunters by modifying season dates or by allocating permits. Similar requests for board changes in allocation of sheep hunting opportunity have been addressed previously by the board at meetings covering regions III, IV, and V.

This proposal is not likely to affect sheep populations, since the current full curl ram bag limit adequately guards against overharvest, at least in most cases. In heavily harvested areas, limiting nonresident hunters may increase the number of legal rams available to residents, but the extent to which this might occur is unknown. In areas heavily hunted by residents, this proposal may not provide any benefit to resident sheep hunters.

During 2004–2013, 86% of sheep hunters throughout the region were residents who took 62% of the harvest (average = 16% success). Nonresident success in general season hunts is generally greater than 60%.

Table 137-1. Sheep hunting statistics during fall 2004–2013 sheep hunts in selected units:

	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non- resident success rate
All Region IV	829	86%	178	62%	16%	57%
Unit 9A	0	25%	0	---	0%	0%

Unit 9B	4	90%	1	100%	29%	0%
Unit 11	175	88%	60	80%	31%	59%
Unit 13A	196	93%	22	74%	9%	39%
Unit 13B	36	92%	5	75%	11%	48%
Unit 13C	31	88%	5	46%	8%	66%
Unit 13D	117	79%	30	46%	15%	66%
Unit 13E	90	84%	13	27%	5%	63%
Unit 14A	117	90%	26	56%	15%	59%
Unit 14B	24	83%	8	30%	13%	81%
Unit 16A	3	73%	0	---	0%	0%
Unit 16B	29	96%	8	63%	24%	35%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of harvests between resident and nonresident sheep hunters. Because resident participation and success change over time, it will be difficult to accurately achieve the proposed harvest allocation, even if resident and nonresident hunting opportunity is managed by a drawing permit hunt. In-season management to achieve the harvest allocation will also be extremely difficult, even with a short reporting period requirement for successful hunters.

COST ANALYSIS: Adoption of this proposal would not result in significant costs to the department.

PROPOSAL 138 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

PROPOSED BY: Alaska Department of Fish & Game

WHAT WOULD THE PROPOSAL DO? Reauthorize antlerless moose hunting seasons in Units 20A, 20B and 20D.

WHAT ARE THE CURRENT REGULATIONS? Antlerless moose hunts are available in Interior Alaska by drawing or registration permit only. In Unit 20B, a total of 73 drawing or registration antlerless hunts are offered, and Unit 20D has 3 hunts available by drawing permit only. Antlerless hunts are also listed in codified for Unit 20A. However, antlerless permits were suspended for Unit 20A in 2013 due to low population estimates and again in 2014 due to inadequate snow conditions for flying surveys.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Antlerless hunts will continue to be available to hunters, and the department will continue to have the authority to use antlerless hunts as a tool to regulate the moose populations.

BACKGROUND: The Board of Game must annually reauthorize antlerless moose hunting seasons. Our goal is to provide for a wide range of public uses and benefits, and to protect the health and habitat of moose populations. Antlerless hunts are important for improving or maintaining the ability of moose habitat to support current populations. They also help regulate moose population growth, help to meet Intensive Management (IM) objectives for high levels of harvest, and provide subsistence hunters with a reasonable opportunity to pursue moose for subsistence uses without reducing bull-to-cow ratios.

If antlerless moose hunts are not reauthorized, the moose population may increase to unacceptable levels or may need reduction when new data is available and analyzed. Opportunity to hunt a harvestable surplus of cow moose will be lost, and our ability to meet intensive management harvest objectives will be compromised. Subsistence hunters in the portion of Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats) may not have a reasonable opportunity to pursue moose for subsistence uses.

This reauthorization of antlerless moose hunts will likely improve or maintain the ability of moose habitat to support the current moose population. Hunting opportunity and harvest will increase and allow the department to manage these moose populations at optimum levels. The additional harvest will help in meeting intensive management harvest objectives. It will also allow hunters to harvest moose toward meeting the intensive management harvest objective without reducing bull-to-cow ratios to low levels. Meat and subsistence hunters will benefit from the opportunity to harvest cow moose. Moose populations will benefit by having moose densities compatible with their habitat. Motorists and residents may benefit from reduced moose–vehicle collisions and moose–human conflicts.

Unit 20A: The purpose of antlerless moose hunts in Unit 20A is to regulate population growth, to meet the IM mandate for high levels of harvest, and to provide subsistence hunters with a reasonable opportunity for success in obtaining moose for subsistence uses in Unit 20A outside the Fairbanks Nonsubsistence Area (part of the western Tanana Flats). The goal is to protect the health and habitat of the moose population and to provide for a wide range of public uses and benefits.

The number of moose in Unit 20A was estimated at 17,768 in 2003. Research indicated this high-density moose population was experiencing density-dependent effects, including low productivity, relatively light calf weights, and high removal rates of winter forage. The objective beginning in regulatory year 2004–2005 (RY04) was to reduce moose numbers to the population objective of 10,000–12,000 unless indicators of moose condition showed signs of improvement at higher densities. The Unit 20A population was estimated at 10,272–14,115 moose (90% confidence interval) in 2012.

The current objective is to maintain moose numbers within the population objective of 12,000–15,000 moose (the IM population objective adopted by the board in 2012) while monitoring indicators of moose and habitat condition for density-dependent responses. The Unit 20A population was estimated at 8,678–11,633 moose (90% confidence interval) in 2013. As a result, the antlerless hunts were suspended during RY14. In addition, because we were not able to obtain a population estimate in 2014, we are recommending that antlerless hunts again be suspended in RY15. However, if the 2015 population estimate exceeds 12,000 moose and no improvements in indices of nutritional condition (i.e., twinning rates or 10-month old calf weights) are detected, the antlerless hunts may need to be reinstated in RY15 or RY16 to regulate population growth.

Unit 20B: The Unit 20B antlerless moose hunts are divided into 3 main areas. The Fairbanks Management Area (FMA), which is located primarily around the urban centers of Fairbanks and North Pole, consists of drawing permit hunts for antlerless moose. The Minto Flats Management Area (MFMA), which has a high-density moose population, provides for subsistence uses via a registration permit hunt for antlerless moose. Finally, the Middle Fork of the Chena River and Unit 20B remainder (primarily those portions of Central and Western Unit 20B excluding the FMA and MFMA) are where most of the antlerless drawing permits will be issued.

Fairbanks Management Area — The purpose of this antlerless hunt is to regulate population growth in the FMA and potentially reduce moose–vehicle collisions and nuisance moose problems.

The number of moose–vehicle collisions in the FMA is high and poses significant safety risks to motorists. In addition, moose nuisance issues continue to place significant demands on property owners. To increase hunting opportunity and harvest and reduce moose–vehicle collisions, the department incrementally increased the number of drawing permits for antlerless moose in the FMA during RY99–RY10. Moose–vehicle collisions and moose nuisance problems have declined, presumably, in part due to consistent harvest of 27 to 37 antlerless moose during RY10–RY14.

Minto Flats Management Area — The primary purpose of this antlerless hunt is to provide a reasonable opportunity for subsistence uses and to regulate the moose population in the MFMA.

The MFMA moose density was high in 2010 (4.1 moose/mi²). In order to reduce the moose population, harvest of antlerless moose during RY12 and RY13 was about 2.5% of the population. The fall 2013 estimate shows a more sustainable density in the MFMA (2013 = 2.6 moose/mi²). Therefore, to stabilize this population, the antlerless harvest goal has been reduced to about 1% of the total moose population to maintain the current population level.

Unit 20B, drainage of the Middle Fork of the Chena River and the Remainder of Unit 20B (Central and Western Unit 20B) — The antlerless moose harvest in this area is designed to regulate the moose population in this portion of Unit 20B and to help meet the IM harvest objectives for Unit 20B. The 2013 population estimate (14,057 moose) indicates the population declined from the 2009 estimate (20,173 moose) and is now at a more sustainable level for the habitat. The antlerless harvest goal will be approximately 1% of the total population to maintain the moose population at the current level.

To mitigate hunter conflicts, we spread hunters out over space and time. Each of 16 hunt areas in Central and Western Unit 20B has permits in three time periods: one before the general hunt, one during, and one after. This maintains a few hunters at a time in each permit area, yet is expected to achieve a harvest of approximately 100 cows.

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

Because of poor weather conditions during November and December 2014, moose surveys were not conducted in Unit 20B, so we do not have a current population estimate. That, coupled with the observed decline in the population between 2009 and 2013, calls for a more conservative harvest strategy. The department recommends an antlerless harvest for RY15 of approximately 1% of the total population. We predict this conservative harvest strategy will maintain the moose population at the current level.

Unit 20D: The moose population in Unit 20D reached the IM objective of 8,000–10,000 in 2006. The highest density (5.6 moose/mi²) was in southwestern Unit 20D where the population was exhibiting effects of increased competition for food, including a moderately low level 2-year average twinning rate of 14%. Antlerless moose hunts during RY06–RY09 contributed to a decreased moose density in southwestern Unit 20D. The goals of the Unit 20D antlerless moose hunts were to stabilize population growth and to address concerns about range degradation, reduced nutritional condition, and reduced reproductive success. Most of these goals have been met. Moose density was reduced from 5.6 moose/mi.² (pre-antlerless hunts) to 3.2 moose/mi.² (post-antlerless hunts). Overwinter browse utilization decreased from 25% in 2007 to 15% in 2010. The average weight of 9 month old calves increased from 340 lbs. in 2010 to 366 lbs. in 2012 (K. Seaton, ADF&G, unpublished data, Fairbanks).

With the exception of the Bison Range Youth Moose Hunt, antlerless permits have not been issued since fall 2009. However, antlerless moose will be part of the bag limit for the Delta Junction Management

Area Disabled Veterans Moose Hunt, beginning in fall 2015. Future antlerless hunts are likely needed to maintain the population at the optimal density and will contribute toward meeting the IM harvest objective of 500–700 moose. However, registration permits will be issued only if additional harvest is needed in specific areas to maintain optimal moose densities.

Antlerless moose hunts in Unit 20D and their effect on moose density and population growth will continue to be evaluated. Future antlerless moose hunts will be implemented as needed based on evaluation of 3 indices of density-dependent moose nutritional conditions in relation to changes in moose density: biomass removal of current annual growth on winter browse, proportion of females with twin calves, and late-winter calf weights. During the 2015 season we have no plans to issue permits for antlerless moose hunting in Unit 20D, except for a total of 16 permits for which antlerless moose (except a cow accompanied by a calf or a calf) are part of the legal bag limit in the Bison Range Youth Moose Hunt and the Disabled Veteran Moose Hunt.

Current season dates and bag limits in codified changed from the original proposal during the March 2014 board meeting to the following:

Units and Bag Limits	Resident Open Season (Subsistence and General Hunts)	Nonresident Open Season
(18)		
Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area		
RESIDENT HUNTERS:		
1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side; or	Sept. 1–Sept. 25 (General hunt only)	
1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	
1 antlerless moose by registration permit only;	Oct. 1–Feb. 28 (General hunt only)	

a person may not take
a cow accompanied
by a calf; or

1 bull by drawing permit
only; up to 1,000 permits
may be issued in combi-
nation with the Remainder
of Unit 20(A); or

Sept. 1–Sept. 25
(General hunt only)

1 bull by drawing
permit only; by
muzzleloader only;
up to 75 permits
may be issued in
combination with
nonresidents in
Unit 20(A); or

Nov. 1–Nov. 30
(General hunt only)

1 moose by targeted
permit only; by shotgun or
bow and arrow only; up
to 100 permits may be issued

Season to be announced
by emergency order
(General hunt only)

NONRESIDENT HUNTERS:

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

Sept. 1–Sept. 25

1 bull with 50-inch
antlers or antlers
with 4 or more brow
tines on one side,
by drawing permit
only; by muzzleloader
only; up to 75 permits
may be issued in
combination with
residents in Unit 20(A);

Nov. 1–Nov. 30

Remainder of Unit 20(A)

RESIDENT HUNTERS:

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

Sept. 1–Sept. 25

1 antlerless moose by drawing permit only; up to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a person may not take a cow accompanied by a calf; or

Aug. 15–Nov. 15
(General hunt only)

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

Aug. 25–Feb. 28

1 bull by drawing permit only; up to 1,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; or

Sept. 1–Sept. 25

1 moose by targeted permit only; by shotgun or bow and arrow only; up to 100 permits may be issued

Season to be announced
by emergency order
(General hunt only)

NONRESIDENT HUNTERS:

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

Sept. 1–Sept. 25

Unit 20(B), that portion within Creamer's Refuge

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

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

Sept. 1–Sept. 30

Nov. 21–Nov. 27

1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27 (General hunt only)	Sept. 1–Nov. 27
1 antlerless moose by muzzleloader by drawing permit only; up to 10 permits may be issued; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area	Dec. 1–Jan. 31 (General hunt only)	Dec. 1–Jan. 31
Unit 20(B), remainder of the Fairbanks Management Area		
1 bull with spike-fork or greater antlers, by bow and arrow only; or	Sept. 1–Sept. 30 (General hunt only) Nov. 21–Nov. 27 (General hunt only)	Sept. 1–Sept. 30 Nov. 21–Nov. 27
1 antlerless moose by bow and arrow only, by drawing permit only; up to 150 bow and arrow permits may be issued in the Fairbanks Management Area; a recipient of a drawing permit is prohibited from taking an antlered bull moose in the Fairbanks Management Area; or	Sept. 1–Nov. 27 (General hunt only)	Sept. 1–Nov. 27
1 moose by targeted permit only; by shotgun or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order (General hunt only)	No open season.

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

RESIDENT HUNTERS:

1 bull; or

Aug. 21–Aug. 27
(Subsistence hunt only)

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

Sept. 8–Sept. 25

1 antlerless moose by
registration permit only

Oct. 15–Feb. 28
(Subsistence hunt only)

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers
or antlers with 4 or more
brow tines on one side by
drawing permit only; up
to 8 permits may be issued

Sept. 8–Sept. 25

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

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

Aug. 15–Nov. 15
(General hunt only)

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

Oct. 1–Feb. 28
(General hunt only)

No open season.

1 bull; or

Sept. 1–Sept. 25

Sept. 1–Sept. 25

1 bull, by bow
and arrow only; or

Sept. 26–Sept. 30

Sept. 26–Sept. 30

1 bull by drawing
permit only; by
muzzleloader only; up

Nov. 10–Dec. 10
(General hunt only)

No open season.

to 60 permits may be issued in combination with the hunt in the Salcha River drainage upstream from and including Goose Creek, and the hunt in the Salcha River drainage downstream of Goose Creek and upstream from and including Butte Creek; or

Beginning July 1, 2015, 1 bull by registration permit only; by muzzleloader only, in the Salcha River drainage upstream from and including Butte Creek

Nov. 10–Dec. 10
(General hunt only)

No open season.

Unit 20(B), that portion of the Salcha River drainage upstream from and including Goose Creek

1 bull; or

Sept. 1–Sept. 25

Sept. 1–Sept. 25

1 bull, by bow and arrow only; or

Sept. 26–Sept. 30

Sept. 26–Sept. 30

1 bull by drawing permit only; by muzzleloader only; up to 60 permits may be issued in combination with the hunt in the Middle Fork of the Chena River, and the hunt in the Salcha River drainage downstream of Goose Creek and upstream from and including Butte Creek; or

Nov. 10–Dec. 10
(General hunt only)

No open season.

Beginning July 1, 2015, 1 bull by registration permit only; by muzzleloader only, in the Salcha River drainage downstream of Goose Creek and upstream from and including Butte Creek;

Nov. 10–Dec. 10
(General hunt only)

No open season.

Unit 20(B), that portion

of the Salcha River drainage
downstream of Goose
Creek and upstream from
and including Butte Creek

1 bull; or	Sept. 1–Sept. 20	Sept. 5–Sept. 20
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in combination with the hunt in the Remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Feb. 28 (General hunt only)	
1 moose by targeted permit only; by shotgun or bow and arrow only; up to 100 permits may be issued; or	Season to be announced by emergency order (General hunt only)	No open season.
1 bull by drawing permit only; by muzzleloader only; up to 60 permits may be issued in combination with the hunt in the drainage of the Middle Fork of the Chena River and the hunt in the Salcha River drainage upstream from and including Goose Creek; or	Nov. 10–Dec. 10 (General hunt only)	No open season.
Beginning July 1, 2015, 1 bull by registration permit only; by muzzleloader only, in the drainage of the Middle Fork of the Chena River and in the Salcha River drainage upstream from and including Goose Creek;	Nov. 10–Dec. 10 (General hunt only)	No open season.

Unit 20(B), that
portion southeast
of the Moose
Creek dike within
one-half mile of
each side of the
Richardson highway

1 bull; or	Sept. 1–Sept. 20	Sept. 5–Sept. 20
1 moose by drawing permit only; by bow and arrow or muzzleloader only; up to 100 permits may be issued; or	Sept. 16–Feb. 28 (General hunt only)	No open season.
1 moose by targeted permit only; by shotgun or bow and arrow only; up to 100 permits may be issued	Season to be announced by emergency order (General hunt only)	No open season.
Remainder of Unit 20(B)		
1 antlerless moose by drawing permit only; by youth hunt only; up to 200 permits may be issued; or	Aug. 5–Aug. 14	No open season
1 bull; or	Sept. 1–Sept. 20	Sept. 5–Sept. 20
1 antlerless moose by drawing permit only; up to 1,500 permits may be issued in the Remainder of Unit 20(B); a person may not take a cow accompanied by a calf; or	Aug. 15–Nov. 15 (General hunt only)	No open season.
1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or	Oct. 1–Feb. 28 (General hunt only)	
1 moose by targeted permit only; by shotgun or bow and arrow only; up	Season to be announced by emergency order (General hunt only)	No open season.

to 100 permits may be issued

...

Unit 20(D), that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River, except the Delta Junction Management Area and the Bison Range Controlled Use Area

RESIDENT HUNTERS:

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

Sept. 1–Sept. 15
(General hunt only)

1 bull by drawing permit; or

Sept. 1–Sept. 15
(General hunt only)

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion in the Delta Junction Management Area; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25
(General hunt only)

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

Oct. 10–Nov. 25
(General hunt only)

NONRESIDENT HUNTERS:

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

Sept. 5–Sept. 15

Unit 20(D), that portion within the Bison Range Controlled Use Area

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side; or 1 antlerless moose, per lifetime of a hunter, by youth hunt drawing permit only; up to 10 permits may be issued; a person may not take a calf or a cow accompanied by a calf;

Sept. 1–Sept. 30
(General hunt only)

Sept. 1–Sept. 30

Unit 20(D), that portion within the Delta Junction Management Area

RESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15
(General hunt only)

1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side by drawing permit only; up to 30 permits may be issued; or

Sept. 1–Sept. 15
(General hunt only)

1 antlerless moose by drawing permit only; up to 1,000 permits may be issued in combination with that portion lying west of the west bank of the Johnson River and south of the north bank of the Tanana River; a person may not take a calf or a cow accompanied by a calf; or

Oct. 10–Nov. 25
(General hunt only)

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

Oct. 10–Nov. 25
(General hunt only)

NONRESIDENT HUNTERS:

1 moose every four regulatory years by drawing permit only, a person may not take a calf or a cow accompanied by a calf; or

Sept. 1–Sept. 15

1 bull with 50-inch antlers
or antlers with 4 or
more brow tines on one
side by drawing permit
only; up to 30 permits may
be issued

Sept. 1–Sept. 15

...

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal as amended in the regulations above, which reflect changes made during the 2014 Board of Game meeting.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.

PROPOSAL 139 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

PROPOSED BY: Alaska Department of Fish and Game

WHAT WOULD THE PROPOSAL DO? Reauthorize brown bear tag fee exemptions for all resident hunters in Region III.

WHAT ARE THE CURRENT REGULATIONS? The \$25 locking tags are not required for residents to take brown bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The tag fee exemption would continue, and residents would not need to purchase a \$25 brown bear tag in order to hunt brown bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

BACKGROUND: The Board of Game must annually reauthorize all resident tag fee exemptions. Resident brown bear tag fees were put in place statewide during the mid 1970s to discourage incidental harvest, elevate the status of brown and grizzly bears to trophies, and to provide revenue. Today, Region III populations are healthy, grizzly bears are highly regarded as trophies, and revenue can be generated from non-tag fee sources. The board must annually reauthorize all resident tag fee exemptions. Reauthorizing these tag fee exemptions will allow residents who are unable to purchase the \$25 tag before hunting, due to lack of vendors or economic reasons, to opportunistically and legally harvest grizzly bears.

Eliminating all resident grizzly bear tag fees throughout Interior and Eastern Arctic Alaska (Region III) simplifies regulations, increases resident hunter opportunity, and is not likely to cause declines in these grizzly bear populations. This reauthorizat on would assist with our objective of managing Region III grizzly bear populations for hunter opportunity and would continue to allow hunters to take grizzlies opportunistically. During regulatory years 2006–2012, 32% of grizzlies harvested by resident hunters in Region III were taken incidentally to other activities compared with 14% statewide.

We estimate that a kill rate of at least 6 percent, composed primarily of males, is sustainable. Human-caused mortality in most of Region III has been consistently less than 6% of the population. Where harvests are elevated (i.e. Units 20D, 20B, 20A, and portions of 26B), grizzly populations are managed through changes in seasons and bag limits. Resident tag fees that were in place prior to 2010 appeared to have no effect on harvest in these areas.

As part of this request to reauthorize exemption of grizzly tag fee throughout Region III, we recommend that the board, at a minimum, continue to reauthorize the tag fee exemptions for subsistence registration permit hunts in Units 19A and 19B (downstream of and including the Aniak River drainage), 21D, and 24.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in additional costs to private parties.