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**Alaska Department of Fish and Game**  
**Staff Comments for Proposals 155, 156, 157, 158, & 160**  
**Arctic/Western Region Alaska Board of Game Meeting**  
**Bethel, Alaska**  
**January 5-9, 2017**



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**The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, January 5-9, 2017 in Bethel, 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.**

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**PROPOSAL 155 –5 AAC 92.108 Identified big game prey populations and objectives and 5 AAC 92.118. Intensive Management Plans IV.** Review and modify the Unit 15C Intensive management objectives and plans.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal renews the Intensive Management (IM) regulation for Unit 15C.

**WHAT ARE THE CURRENT REGULATIONS?** Regulations are found under both 5 AAC 92.108 and 5 AAC 92.118(c). The current regulation is scheduled to expire on June 30, 2017.

There is a positive IM finding for moose in Unit 15C with the following population and harvest objectives:

**5AAC 92.108. Identified big game prey populations and**

<b>objectives.</b>	<b>Population</b>	<b>Finding</b>	<b>Population</b>
<b>Harvest</b>		<b>Objective</b>	<b>Objective</b>
...			
Moose			
Unit 15(C)	Positive	2,500–3,500	200–350

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The Intensive Management (IM) program for Unit 15C has not been implemented since it was adopted in 2012; however, the department is reviewing implementation options. The operational plan for Intensive Management for 15C was recently reviewed and updated by the department, and research in the area is ongoing.

**BACKGROUND:** The current IM plan for Unit 15C is scheduled to expire on June 30, 2017; however, the next Region II board meeting will not be held until 2019. If this regulation is not renewed prior to June 30, 2017 the program will be suspended until the board renews the regulation.

The Unit 15C IM plan was adopted in January 2012. In March 2012, the department initiated research efforts focusing on moose productivity, body composition, survival, movements, and mortality. This project is still ongoing, and data is being collected that was not available when the current IM plan was adopted. Recent population estimates have been within IM objectives, and the 2016 harvest (211 moose) was within the low end of the IM harvest objectives.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal. Unit 15C is an important area for producing high levels of moose for human consumptive use and helps meet subsistence needs.

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

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**PROPOSAL 156 – 5 AAC 92.111 Intensive Management Plan I.** Reauthorize the Mulchatna Caribou Herd Predation Management Plan.

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

**WHAT WOULD THE PROPOSAL DO?** This proposal provides new regulatory language and reauthorizes the Mulchatna caribou herd (MCH) predation management plan until June 30, 2024.

**WHAT ARE THE CURRENT REGULATIONS?** The MCH Predation Management Plan in 5 AAC 92.111 expires June 30, 2017.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If this proposal is adopted, the department will be able to implement the IM program for the MCH for an additional 6 years. The proposed regulatory language does not alter the current IM program in the MCH Predation Management Plan. To conform to the department's current IM protocol, this proposal updates the regulatory language in 5AAC 92.111, reducing its length while leaving the program unaffected. The department will also present a feasibility assessment for the MCH Predation Management Area.

**BACKGROUND:** The MCH Predation Management Area was established in Units 9B, 17B, 17C, 19A, and 19B to increase the MCH to the intensive management objectives for population size and harvest and was originally authorized in 2011. The management area encompasses approximately 39,683 square miles and includes control areas that are limited to a combined total of 10,000 square miles (25% of the management area). The control areas are designated by the department based on the herd's calving distribution.

The current population estimate of 27,000 and average 5-year annual harvest of 281 caribou for the MCH are below IM objectives throughout the range (population size objective = 30,000–80,000 caribou; harvest objective = 2,400–8,000 caribou). Wolves are a major predator of caribou in the range of the MCH and are an important factor in failing to achieve these objectives. A reduction of predation can reasonably be expected to aid in achieving the objectives.

**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.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 157 – 5 AAC 85.065(a)(4)(G) Hunting season and bag limits for small game; and 99.025(12) Customary and traditional uses of small game**

**PROPOSED BY:** The Alaska Migratory Bird Co-Management Council (AMBCC)

**WHAT WOULD THE PROPOSAL DO?** The proposal opens a hunting season for emperor geese in Units 8, 9, 10, 17, 18, 22, and 23 and requests a customary and traditional use determination for emperor geese.

**WHAT ARE THE CURRENT REGULATIONS?**

	Resident Open Season (General Hunt Only)	Nonresident Open Season
Units and Bag Limits  (G) Emperor geese	No open season	No open season

A customary and traditional use determination has not been made for emperor geese.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The proposal would provide fall hunting opportunity for emperor geese in units where they occur. The federal framework allows a harvest quota of up to 1,000 birds annually to be administered as a permit hunt between September 1 and January 22.

**BACKGROUND:** The annual range of emperor geese in Alaska includes coastal areas of western Alaska from the Bering Strait to the Aleutian Islands, including the Kodiak Archipelago. Most (90%) emperor geese breed on the Yukon-Kuskokwim Delta, with the remainder nesting on the Seward Peninsula and Chukotka Peninsula in Russia. Emperor geese winter in the Aleutian Islands and Alaska Peninsula with smaller numbers at Kodiak Island. Spring and fall migrants follow the Bering Sea coastline of Alaska.

The emperor goose population is managed according to guidelines defined in the Pacific Flyway Emperor Goose Management Plan (Management Plan; see [http://www.pacificflyway.gov/Documents/Eg\\_plan.pdf](http://www.pacificflyway.gov/Documents/Eg_plan.pdf)) that prescribe population monitoring protocols and population thresholds for opening and closing seasons. The season was closed in 1986 when the population index fell below 60,000 birds based on an aerial survey of spring migrants. Since then the population has slowly recovered.

Survey indices indicate a minimum population size. Recently developed population models integrated data from 30 years of surveys and demographic studies and estimated 150,000–170,000 emperor geese; a population sufficient to sustain harvest. In 2015, the survey index was above 80,000 birds, enough to allow an open season.

In 2016, the Management Plan was revised based on these models to include newly developed harvest guidelines for a fall hunt to begin on or after September 1 to provide for general and subsistence uses. The guidelines allowed for a harvest quota of 1,000 birds per year to be administered as a registration permit hunt. A separate AMBCC *Emperor Goose Management Plan* specifies regulations for spring/summer subsistence harvest of emperor geese. In October 2016, a federal framework change was approved under the new harvest guidelines in both management plans to open the spring/summer subsistence and the fall hunt for emperor geese for the 2017–18 season.

Hunting emperor geese is a customary and traditional practice of Alaska Native communities within their range, who depend upon these birds for subsistence. Approximately 30% of the

reported subsistence harvest occurs during the fall and winter, primarily in the southern portions of the range.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal to bring state regulations into compliance with the federal framework and provide harvest opportunity of emperor geese throughout the fall/winter range. The department is neutral on allocation of the harvest. The board should first make a customary and traditional use determination (a “C&T finding”) and then establish a hunt for emperor geese. The department has prepared a separate report that provides the necessary background information organized around the eight criteria listed in 5 AAC 99.010(b). Because emperor geese are part of a large set of migratory game birds traditionally harvested in Alaska, we recommend that the board consider a C&T finding that addresses all migratory game birds with harvestable surpluses. A second option is a C&T finding that only addresses emperor geese.

The federal framework specifies that the hunt(s) be administered as permit hunt(s), which will allow the department to monitor the harvest rate and close hunt(s) by emergency order when the combined quota of 1,000 birds has been reached. A permit will allow the harvest and possession of 1 emperor goose. The department recommends the hunt(s) be administered as registration permit hunt(s) and that a permit also stipulate a 3 day reporting requirement for most areas and a 24 hour reporting requirement for high use areas such as Izembek State Game Refuge and Kodiak Island.

Due to the potentially high public interest in this hunt, the department requests the board consider the following recommendations:

- Allocating the 1,000 bird quota spatially based on harvest patterns.
- Provide an equitable harvest opportunity of a limited quota of birds throughout the fall/winter range of emperor geese by considering their seasonal distribution and regional availability (units). Fall migration of emperor geese is punctuated along the western Alaska coastline as they move from northern to southern regions until settling at terminal winter locations. Therefore, birds will be available to harvest in northern units (e.g., 18, 22, and 23) before there is harvest opportunity in southern units (e.g., 8, 9 and 10).
- Hunts could be administered through several regional registration hunts consisting of clusters of game management units.
- The board should consider allocating separate hunts with harvest quotas to lands and waters within the Izembek State Game Refuge; and perhaps other popular hunt areas.

We recommend the registration permit hunt of emperor geese be organized as follows:

WUXX1 GMU 8      Season dates: Oct 8 to Jan 22  
                          Bag limit: 1 emperor goose by registration permit

	Report within 24 hours of kill
WUXX2 GMU 9 (except Izembek SGR), 17, and GMU 10 (Unimak Is only)	Season dates: Sept 1 to Dec 16 Bag limit: 1 emperor goose by registration permit Report within 3 days of kill
WUXX3 GMU 9, Izembek State Game Refuge	Season dates: Oct 15 to Oct 30 Bag limit: 1 emperor goose by registration permit Report within 24 hours of kill
WUXX4 GMU 10, (except Unimak Is)	Season dates: Oct 8 to Jan 22 Bag limit: 1 emperor goose by registration permit Report within 3 days of kill
WUXX5 GMU 18	Season dates: Sept 1 to Dec 16 Bag limit: 1 emperor goose by registration permit Report within 3 days of kill
WUXX6 GMU 22	Season dates: Sept 1 to Dec 16 Bag limit: 1 emperor goose by registration permit Report within 3 days of kill
WUXX7 GMU 23	Season dates: Sept 1 to Dec 16 Bag limit: 1 emperor goose by registration permit Report within 3 days of kill

**COST ANALYSIS:** Approval of this proposal will result in additional costs to the department to make registration permits available.

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**PROPOSAL 158 – 5 AAC 92.037. Permits for falconry.** Remove the West Nile Virus testing requirements from Falconry Manual No. 9.

**PROPOSED BY:** Don Hunley

**WHAT WOULD THE PROPOSAL DO?** Remove the West Nile Virus (WNV) testing requirements from Falconry Manual No. 9.

### **WHAT ARE THE CURRENT REGULATIONS?**

5 AAC 92.037(a) states:

A permit and valid, current Alaska hunting license is required for taking, transporting, or possessing a raptor for falconry or for practicing falconry in this state. The permit will be issued under standards, procedures, and conditions set out in the Falconry Standards

section of the *Alaska Falconry Manual* No. 9, dated July 1, 2012; that section of the falconry manual is hereby adopted by reference.

The *Alaska Falconry Manual* No. 9, Falconry Standards (31) states:

West Nile Virus Testing – a negative titer for West Nile Virus at a 1:10 dilution from a blood sample drawn within 30 calendar days prior to the date of import, or a certificate indicating the raptor was vaccinated against West Nile Virus by a licensed veterinarian. Test results or a certificate of vaccination should accompany the application for an import permit.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** West Nile Virus testing and/or vaccination would no longer be required for falconry birds imported into Alaska.

**BACKGROUND:** In 2013, the Department issued an addendum to the *Alaska Falconry Manual* No. 9 removing the WNV testing requirement. A number of falconers indicated testing was expensive, took several days for the results to come in, and the quarantine period was inconvenient. The department consulted with Dr. Patrick T. Redig, DVM, who runs the Raptor Center at the University of Minnesota. Based on information provided by Dr. Redig, the department agreed that “environmental conditions throughout Alaska make it highly unlikely that the disease could be introduced by imported raptors.”

Research indicates WNV can be transmitted under a variety of conditions, the most common being a bite from an infected mosquito. However, oral and cloacal shedding from infected birds can transmit the virus to birds without the presence of mosquitos. A persistently infected bird may harbor the virus after its death and may transmit WNV to scavengers. Furthermore, research shows WNV has been found in a variety of habitat conditions, and WNV outbreaks have occurred from New York to California and from Canada to tropical America.

**DEPARTMENT COMMENTS:** The department recommends **DEFERRING** this proposal until the next statewide BOG meeting. WNV testing affects a small number of falconers presently and is required for both falconry birds and raptors brought in under educational permits. WNV lab testing costs \$25 – 30. The department plans to revise the falconry manual with input from the falconer’s association before the next statewide BOG meeting.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.

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**PROPOSAL 160– 5 AAC 85.045 Hunting season and bag limits for moose. Extend resident hunting season for moose in Unit 18 remainder as follows:**

**PROPOSED BY:** Orutsararmiut Native Council

**WHAT WOULD THE PROPOSAL DO?** This proposal extends the resident season in Unit 18 Kuskokwim Hunt area from September 1–10 to September 1–30.

**WHAT ARE THE CURRENT REGULATIONS?** The current resident moose season in Unit 18 Kuskokwim hunt area is September 1–September 10 with a bag limit of 1 antlered bull by registration permit (RM615). There is no open season for nonresidents.

There is a positive C&T finding for moose in Unit 18, and an ANS of 200–400.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** This proposal creates additional resident hunting opportunity by extending the moose season 20 days in the Kuskokwim River area. The department would use discretionary permit authority to create two distinct hunt areas, which would improve in-season hunt management along the Kuskokwim River.

**BACKGROUND:** The department and the Yukon Delta National Wildlife Refuge (YDNWR) collaborate to complete moose population surveys and administer cooperative state and federal moose hunts in this portion of Unit 18. There are two survey areas in this portion of Unit 18. The first survey area includes the main stem of the Kuskokwim River, and the second survey area includes tributaries that flow into the Kuskokwim. Population surveys completed in combined survey areas indicate the moose population has doubled (93% increase) during the last 4 years, increasing from 972 moose in 2011 to 1881 moose in 2015.

This portion of Unit 18 includes a checkerboard of state managed and federal lands, and current state (September 1-10) and federal (September 1-30) hunting season dates are inconsistent, and a portion of the hunt area is less accessible for boat access than the main stem of the Kuskokwim (mostly USFWS administered Federal lands). During RY2016, the hunting season on federal lands was open for 15 days with a harvest objective of 90 moose, but only 45 were taken. During the same regulatory year, state managed lands were closed after 5 days when the quota of 150 moose was anticipated to be reached.

**DEPARTMENT COMMENTS:** The department **SUPPORTS** this proposal because it would provide additional flexibility to manage the area's growing moose population. The department is neutral on allocative aspects of the proposal. If the board adopts this proposal, the department will consult with the YDNWR and local Fish and Game Advisory Committees to choose easily identifiable geographic features to define the two hunt areas.

**COST ANALYSIS:** Adoption of this proposal would not result in additional costs for the department.